



**DESERT TORTOISE COUNCIL**

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**Via email only**

17 November 2022

Attn: June Lowery, Francisco J Mendoza, Amy McGowan

Bureau of Land Management, Tucson Field Office

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RE: Scoping Comments for Middle Gila South Transportation Plan (DOI-BLM-AZ-G020-2022-0028-EA)

Dear Ms. Lowrey et al.,

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 known to be occupied by Sonoran desert tortoise (*Gopherus morafkai*) (synonymous with Morafka'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 and attachments for the proposed project.

Based on the following information given in the BLM's Press Release dated 26 September 2022, we understand that BLM is soliciting formal scoping comments for this proposed project: "The Bureau of Land Management Tucson Field Office is starting an access and transportation management planning process that will designate roads and trails on BLM lands in the Middle Gila South travel management planning area. The resulting travel management plan will identify the transportation system that will be maintained for multiple land use activities, public land infrastructure, hunting, and other recreational opportunities."

"The BLM will consider input to evaluate the existing route system, determine appropriate management designations and options, and analyze the potential impacts from the access and transportation route designations. The planning area includes approximately 60,000 acres of BLM land about 40 to 60 miles from Tucson, near small communities in Cochise, Gila, Pima, and Pinal counties. BLM lands include approximately 700 miles of existing routes intermingled with Arizona State Trust and other lands. Most of the existing routes are unmaintained primitive roads or trails in poor conditions, with drainage and erosion problems."

"An environmental assessment [EA] for the proposed access and transportation management plan will be prepared in accordance with the National Environmental Policy Act, and opportunities for public review and comment will be available at milestone stages throughout the process. Completion of the access and transportation management plan and environmental assessment is expected in July 2023."

During the virtual public meeting on October 19 and 20, 2022, BLM's presentation included the following statement – A travel management plan "[p]rovides opportunities for a range of motorized and non-motorized uses on public lands while protecting resources and minimizing conflicts among users." We request that when BLM develops and analyzes a broad range of alternatives, not just the no action and proposed action alternatives, BLM describes and analyzes how each alternative will be effective in protecting the Sonoran desert tortoise and its habitat, including habitats needed for connectivity among populations.

In addition, we request that BLM describe and analyze in the National Environmental Policy Act (NEPA) document, how it is complying with its mitigation policy, handbook, and manual (BLM 2021a, 2021, b, 2021c); Special Status Species Management Manual (BLM 2008, BLM 2017); and the Sonoran Desert Tortoise Candidate Conservation Agreement (USFWS et al. 2015). Demonstrating this compliance would include (1) implementing a plan that monitors the impacts to the tortoise/tortoise habitat from the public's use of routes, especially use of motorized vehicles; and (2) designing and implementing a monitoring plan that is a science-based, and statistically rigorous. Finally, in the NEPA document, BLM should provide references from scientific journal articles that support its analysis and conclusions.

In its analysis of alternatives, especially those that maintain or increase the miles of routes that are accessible by vehicles, we request that BLM analyze the impacts on increased greenhouse gas emissions from increased motorized vehicle use; increased invasive plant species abundance, density, and occurrence; increased probability of wildfires from the presence of vehicles and humans (Brooks and Matchett 2006) in areas previously not accessible by vehicles; and the loss of vegetation to sequester carbon while inputting more carbon into the atmosphere from fires.

We note in the Press Release that there are “approximately 700 miles of *existing routes* [emphasis added] intermingled with Arizona State Trust and other lands.” Although it has been our observation that the recreating public fails to remain on designated routes, we feel strongly that it is essential that BLM designate all existing routes as either “open” or “closed,” and, “limited,” where necessary. We assume that BLM will use current aerial photography to identify the global network of existing routes. If so, we strongly recommend that there be some ground-truthing to identify, in particular, those “routes” that are actually dry washes.

We have read some management plans that make the blanket statement that “all dry washes are open to vehicle travel,” which we strongly oppose. We prefer wording such as, “Only routes designated as ‘open’ will be available for vehicle travel.” There is clear evidence that tortoises rely on resources associated with washes (Jennings 1992, 1993, 1997), so please be sure that there be a limited number of existing routes in washes that are designated as open. Again, if BLM suspects that a given existing route is actually a wash, that there be ground-truthing to ascertain that. If these field visits reveal that existing routes are in washes that have little or no vehicle use, we ask that BLM programmatically designate them as closed.

That being said, with regards to closed routes, we strongly recommend that BLM eliminate closed routes using camouflaging techniques (e.g., vertical mulching) rather than posting them as closed with red Carsonite signs. Our experience has been that the closed signs often attract use of a barely discernable route that would not have been obvious but for that sign. As such, as given above, it is highly preferable that the routes be eliminated rather than signed as “closed.”

We ask that the EA include a schedule that, among other things, (1) discusses time frames in which all designated routes will be signed as “open” or “closed,” and “limited” where necessary; (2) commits BLM to signing all open routes as the highest priority, followed by a commitment to sign closed routes and, preferably, eliminate them by camouflaging techniques as soon as possible; and (3) identifies a monitoring program that will, over time, determine if vehicles are remaining on the designated-open routes, and identify remedial actions where trespass is judged to be problematic.

With regards to the clause given above, “existing routes intermingled with Arizona State Trust and other lands,” we ask that the EA describe how BLM’s designated route network will minimize trespass on private and State Trust lands. Invariably, BLM designates routes on public lands that appear and disappear at the interface with private land boundaries, which is problematic, especially among land owners who are afflicted by trespass on their lands. Will affected private lands owners be contacted where these interfaces cannot be avoided?

Too often EAs fail to fully analyze the impacts of vehicles on tortoises and their habitats. As such, we provide a bibliography in Appendix A that is a partial list of how routes affect these resources, and expect to see a detailed analysis in the EA that utilizes these references. We also ask that BLM map tortoise concentration areas that are known to be within the 60,000-acre planning area, and target such areas for relatively more closures to minimize impacts to tortoises and their habitats.

We appreciate this opportunity to provide comments on this project and trust they will help protect tortoises during any resulting authorized activities. Herein, we ask that the Desert Tortoise Council be identified as an Affected Interest for this and all other projects funded, authorized, or carried out by the Tucson Field Office of the BLM that may affect species of desert tortoises. Please ensure that any subsequent environmental documentation for such projects, including this one, be 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.  
Ecosystems Advisory Committee, Chairperson  
Desert Tortoise Council

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## Appendix A. Bibliography on road impacts in desert ecosystems

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