



DESERT TORTOISE COUNCIL

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Via email only

Date: 6 September 2024

To: Mr. Ron Nuckles, Field Manager
Bureau Of Land Management, Needles Field Office
1303 S. Hwy 95, Needles, California 92363
BLM_CA_NE_MTNMsocioecon@blm.gov, david.rice2@aecom.com,

Re: Mojave Trails National Monument Management Plan/Environmental Assessment

Dear Mr. Nuckles,

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.

Both our physical and email addresses are provided above in our letterhead for your use when providing future correspondence to us. When given a choice, we prefer to receive emails for future correspondence, as mail delivered via the U.S. Postal Service may take several days to be delivered. Email is an "environmentally friendlier way" of receiving correspondence and documents rather than "snail mail."

On August 23, 2024, we received an email from David Rice (who is cc'd) soliciting input from the public with regards to socioeconomic outreach for the above-referenced plan. In the attached letter dated August 1, 2024, the Bureau of Land Management (BLM) indicated, "The BLM has collected available social and economic data to describe conditions and trends in the monument and the surrounding communities" and BLM is "...interested in knowing the following: Your issues or concerns related to the current role of BLM-administered lands and resources in the local economy," which is the topic we've chosen among the seven issues identified, as it pertains most closely to our mission statement to protect tortoises in their native habitats.

Before we provide a few specific responses to this topic, we would like to reiterate that the Council wants to be identified as an Interested Party for this project, and appreciate that Mr. Rice provided this particular opportunity to participate. We are hopeful that our scoping comments, dated July 3, 2023, will be addressed in the draft environmental assessment (Draft EA), and provide a link to them here again in the footer¹ for your consideration.

¹ <https://www.dropbox.com/scl/fi/addrgsjkie2li8ouIewbl/Mojave-Trails-Nat-Mon-Plan-EA.7-5-2023.pdf?rlkey=mc8h52a2nouknxgidk8kp17iu&dl=0>

We would like to stress the importance of the economic value of maintaining quiet, pristine desert habitats. We speak on behalf of millions of Americans and overseas visitors who enjoy seeing the desert in its natural, unmolested condition. Too often, off-highway vehicle noises associated with motorcycles, all-terrain vehicles, side-by-side vehicles, and dune buggies ruin the solitude visitors have come to appreciate and seek in the desert. Even when not physically present, cross country vehicle use scars the landscape and detracts from the pristine conditions that environmental groups like ours wish to protect. We believe that the National Park Service's conservation management at Joshua Tree National Park provides a good example of how national parks and monuments should be managed.

It is our perception that the BLM too often caters to recreational vehicle user groups at the expense of maintaining undisturbed habitats, which it is mandated to protect under the Federal Land Management Policy Act, among others. The recent expansion of BLM open areas in the West Mojave into several thousand acres of tortoise critical habitat under authority of the Dingell Act, the establishment of Special Recreation Management Areas and Extensive Recreation Management Areas in tortoise critical habitat by the Desert Renewable Energy Conservation Plan, and the opening of Cuddeback and Coyote lakes in the West Mojave, which are surrounded by tortoise critical habitat, to unrestricted vehicle use are examples of recent BLM decisions that will predictably result in more vehicle impacts to essential critical habitats.

It is our understanding that one of the differences between a national park and a national monument is that hunting and grazing may be allowed. If hunting is allowed, we recommend seasonal restrictions from March to May and again in September and October when tortoises are most active and most likely to be encountered by hunters. We recommend that target shooting be prohibited from the national monument. The BLM should also provide a rigorous education program for hunters that encourages them to remain on established roads, to check for tortoises beneath their vehicles before driving off, to avoid littering, and to bury gut piles a minimum depth of one foot so that ravens and coyotes, predators of the tortoise, are not provided with these food subsidies. With regards to cattle or sheep grazing, we do not see any way the economic value of meat or wool production can be significant enough to justify the economic impact to the habitat and wildlife, including tortoises and climate change. Grazing should be excluded from the monument. We also recommend that burros, if they occur, be removed from the monument.

We appreciate this opportunity to provide a few brief comments and look forward to providing more detailed input when the Draft EA is released. Herein, we reiterate that the 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 desert tortoises, and that any subsequent environmental documentation for this project is provided to us at the contact information listed above.

Please 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