



DESERT TORTOISE COUNCIL

3807 Sierra Highway #6-4514

Acton, CA 93510

www.deserttortoise.org

eac@deserttortoise.org

Via email and BLM NEPA ePlanning Portal

July 28, 2025

Mr. Ryan Randell
Bureau of Land Management, Hassayampa Field Office
2020 E. Bell Road
Phoenix, Arizona 85022
BLM_AZ_PDO_PDOEA@blm.gov, randell@blm.gov

RE: Skyline Regional Park Outlying Parcels Project (DOI-BLM-AZ-P010-2025-0010-EA)

Dear Mr. Randell,

The Desert Tortoise Council (Council) is a non-profit organization comprising 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 northern 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."

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project in habitats potentially occupied by the Sonoran desert tortoise (synonymous with Morafka's desert tortoise) (*Gopherus morafkai*), our comments include recommendations intended to enhance protection of this species and its habitat during activities that may be authorized by the Bureau of Land Management (BLM), which we recommend be added to project terms and conditions in the authorizing documents [e.g., land lease, management plan and decision document, etc.] as appropriate. Please accept, carefully review, and include in the relevant project file the Council's following comments for the proposed action.

The International Union for Conservation of Nature’s (IUCN) Species Survival Commission, Tortoise and Freshwater Turtle Specialist Group, now considers the Sonoran desert tortoise, located in Arizona and Sonora, Mexico, to be Vulnerable at this time, but nearly qualifies as Endangered (Averill-Murray et al. 2023). “Steep declines of approximately 54% have occurred in recent years in several formally monitored local subpopulations in Arizona.” “Despite evidence that several subpopulations have stabilized or increased, survival rates are predicted to decline with future drought conditions, which are expected to intensify with global climate change.” In Mexico, “patterns of rainfall and drought across Sonora mirror those in Arizona and suggest that Sonoran subpopulations likely increased and decreased similarly over time.” According to the IUCN, this designation of Vulnerable means that the species is “considered to be facing a high rate of extinction in the wild” and is one step below endangered.

The IUCN identified several threats to the survival of the Sonoran desert tortoise including residential, commercial, and industrial development; ranching and farming; roads and railroads; hunting and trapping; recreational activities; wildfires and fire suppression activities; invasive non-native plant species; and drought/temperature extremes from climate change. The proposed project directly deals with management of non-native feral burros and indirectly affects wildlife, invasive non-native plant species, and drought/temperature extremes from climate change.

Unless otherwise noted, page numbers referenced below are taken from the BLM’s Skyline Regional Park Outlying Parcels Project, Draft Environmental Assessment (Draft EA) (<https://www.dropbox.com/t/4wcRuj3pA2QR6sSV>).

Page 1 of the Draft EA provides the following project description, which equates to the BLM’s Proposed Action: “The [BLM], Hassayampa Field Office received a Recreation & Public Purposes (R&PP) Act Lease application from the City of Buckeye (City) Community Services Department to lease, construct, and maintain two public recreation trailhead facilities on approximately 640 acres of BLM-administered lands located adjacent to Buckeye in Maricopa County, Arizona. These facilities could include, but are not limited to, schools, municipal facilities, and parks. The project is situated in the southern end of the White Tank Mountains range on the eastern side of Skyline Regional Park adjacent to DMB – Verrado (DMB Associates, Inc.) (formerly Whitetank LLC). The BLM currently manages recreation in the two subject parcels; the area has limited to no development, consisting primarily of old off-highway vehicle (OHV) trails. The existing R&PP lease for Skyline Regional Park is an 8,675-acre mountain preserve in the southern White Tank Mountains in Buckeye, Arizona, on the western edge of metropolitan Phoenix (Figure 1-1).”

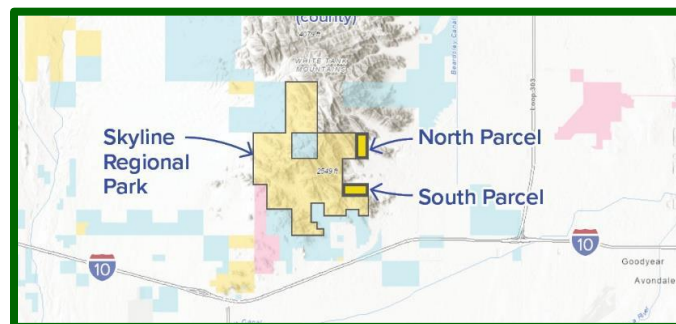


Figure 1-1. Subject parcels (in yellow) in the context of the adjacent BLM lands (light yellow)

With regards to Figure 1-1 on page 2 of the Draft EA, we ask that the Final EA include a legend that explains what the various colors (e.g., blue and pink) signify.

We read on page 3 that, “[t]he BLM published a Notice of Realty Action in the Federal Register on July 9, 2024, and was issued to interested parties on July 9, 2024. Three responses were received in support of the project.” We note that although the Council asked the BLM Phoenix District Office in 2019 to identify us as an “interested party” for all projects that may affect the desert tortoise¹, we did not receive notice of this project in 2024 that would have enabled us to provide scoping comments. Page 4 of the Draft EA indicates that the Arizona Game and Fish Department’s (AZGFD) “...online environmental review tool was utilized to identify special-status species documented within three miles of the project vicinity (AZGFD 2024b; [see Draft EA for this and other references cited therein]),” which among other special status species, included the Sonoran desert tortoise. We take this opportunity to reiterate our desire to be contacted, particularly while soliciting scoping comments, for opportunities to provide input on projects in or adjacent to desert tortoise habitats.

We note the following statements on page 25: “Of the six state-sensitive species known to occur within the project vicinity, only one (Sonoran Desert tortoise) was detected during Terracon’s field surveys between September 16 and October 11, 2024. A pair was located in a caliche den along a wash in the South Parcel. *Breeding status cannot be determined unless physical copulation is observed* [emphasis added]. Many tortoises will utilize the same burrow (especially caliche dens), and a single male can mate with multiple females.”

There are several problems associated with the above italicized statement. First, even when copulation is observed, there is no guarantee that there has been the transfer of sperm. Dr. Kristin Berry (personal communication) has indicated that due to higher sperm motility, copulation in the fall is likely to be more successful than in the spring although tortoises may attempt copulation throughout the year when they are aboveground. Also, since female tortoises can store sperm over multiple years from multiple males, one need not witness copulation to know that females are capable of laying viable, fertilized eggs even in the absence of observing recent copulations. The importance of these observations is that the BLM, project proponent, and experienced biological consultants should be aware that hatchling and juvenile tortoises, which are notoriously difficult to find, may occur onsite and should be relocated prior to ground disturbance in suitable habitats. This is particularly important given the conclusion on page 25 that, “...suitable habitat exists throughout both North and South parcels and the likelihood of additional animals is high.”

We appreciate that the following information is included on page 25: “The Sonoran Desert tortoise is listed as a tier 1 Species of Greatest Conservation Need in Arizona and a sensitive species by the BLM and the BLM is a signatory for the species’ Candidate Conservation Agreement (USFWS 2015),” herein “Agreement”.

Although the Agreement is referenced here, the average reader and perhaps even the contractor may not be sufficiently familiar with it to understand BLM’s associated commitments. The Final EA should clarify that each party to the Agreement “is dedicated to eliminating or reducing threats

¹ <https://www.dropbox.com/scl/fi/56vvesnrgygt2lm517ebs/BLM-AZ-District-Managers-DTC-as-an-Affected-Interest-2019-11-8.pdf?rlkey=5fhcop0pgiwdk9afczs5c3045&dl=0>

to the SDT [Sonoran desert tortoise].” The initial term of this Agreement was for 10 years (June 19, 2025). Thereafter, the Parties agreed that the Agreement “shall be extended for additional five (5) year increments until long-term habitat and population conservation of the SDT is achieved.” Please confirm in the Final EA that the Agreement was extended in June 2025, or not.

As a signatory to this Agreement, BLM committed to implementing:

- (1) BLM Manual 6840 (BLM 2024) that establishes specific procedures for managing the Sonoran desert tortoise as it is a BLM sensitive species, with the goal of conserving the Sonoran desert tortoise and its habitat on BLM-managed lands in cooperation with other agencies;
- (2) landscape level conservation measures (e.g., identifying areas of potential conflict between agency mission and Sonoran desert tortoise habitat and identifying and reducing or otherwise mitigating dispersal barriers between Sonoran desert tortoise populations, etc.); and
- (3) local level conservation measures (e.g., considering the effects of actions on the Sonoran desert tortoise during the planning process, and avoiding or minimizing impacts, or implementing mitigation measures to offset impacts to tortoise populations and habitat where practical and feasible, avoid, where practicable, or otherwise minimize or mitigate adverse effects of actions that could result in isolation of known Sonoran desert tortoise populations and/or landscape-level fragmentation of Sonoran desert tortoise habitat, etc.).

In the Agreement, BLM says, that through its Resource Management Plans (RMPs), BLM managers are directed to “[a]void, minimize or mitigate impacts associated with all BLM authorized activities including mineral material sales, rights-of-way, *recreational use* [emphasis added], travel management, and livestock grazing through project design and modifications to allowable uses in order to achieve Sonoran desert tortoise management objectives” (USFWS et al. 2015).

To comply with the Agreement, the BLM should explain and analyze in the Final EA how it will mitigate (avoid, minimize, and/or compensate) the direct, indirect, and cumulative impacts associated with the Proposed Action in the Draft EA at both local and landscape levels to achieve Sonoran desert management objectives. The Final EA should include an analysis of how the implementation of the Proposed Action would result in “no net loss in quantity and quality of Sonoran desert tortoise habitat” (USFWS et al. 2015). As a signatory to the Agreement, this is one of several commitments BLM made regarding management for the tortoise/tortoise habitat.

Page 25 makes the following statement: “While the Sonoran Desert tortoise does not have protection under the Endangered Species Act, the project area is located on BLM land, which has policies in place to mitigate threats to the species and maintain viable populations and habitat.” We ask that the Final EA explain how BLM will be implementing appropriate and effective actions to comply with these policies and that the Proposed Action is consistent with the following BLM policies:

- Bureau of Land Management. 2008. National Environmental Policy Act Handbook – H-1790-1
- Bureau of Land Management. 2015. Advancing Science in the BLM: An Implementation

Strategy IB 2015-040

- Bureau of Land Management 2022. Habitat Connectivity on Public Lands Instructional Memorandum 2023-005
- Bureau of Land Management. 2024. Special Status Species Management – Manual 6840. Washington, D.C. September 9, 2024

We found only one of these documents mentioned in the Draft EA. BLM should ensure that compliance with all relevant policies is demonstrated and referenced in the Final EA in the Environmental Consequences sections for the appropriate resource issues.

For example, in the National Environmental Policy Act Handbook, BLM is directed to describe and analyze the indirect impacts of a proposed action. In the Draft EA under the resource issue for Recreation, BLM described some of the indirect impacts of the Proposed Action to this resource. However, for Biological Resources, we found no discussion or analysis of indirect impacts. For Water Resources (page 23 of the Draft EA), BLM says there “would be no impacts to surface water in the Proposed Action.” In the following paragraph BLM describes the construction of roads leading through washes to parking areas also located in washes. “Modifications to on-site drainage such as grading and paving would be necessary to accommodate the new facilities. Stormwater would continue to drain in a southeasterly direction. Through project design and an established permitting process (NPDES), there would be no impact to drainage on the Proposed Action site.”

We remind BLM that an NPDES permit regulates water pollution. It does not regulate water quantity or the flow/direction of water. The construction of roads bisecting washes, paved parking lots in washes (58, 48, and 78 stalls), restrooms with septic systems, and other paved features (according to the Draft EA’s Appendix A Plan of Development) will likely impede and alter surface sheet flow and flow in drainages/washes to down-gradient locations. In the Sonoran Desert where the availability of water is scarce, implementation of any grading or compaction would likely affect existing surface flows such that they may be decoupled or disrupted and the existing surface flows that convey surface water through the project site and farther down-gradient surface flows would be altered. Disruption of existing surface hydrology would likely impede the already slow growth rate of desert perennial vegetation or may result in plant mortality both on the project site and down-gradient. Decoupling of a wash system can result in a significant decline in soil moisture, canopy level NDVI values, and mid-day leaf xylem water potentials (Devitt et al. 2022). Over time, especially combined with climate change, this impact may result in reduced plant reproduction, growth, and survival for plants down-gradient of the decoupling sites including plants not on the project site.

In addition, when plants die, they release carbon from their roots, stems, and leaves into the atmosphere and contribute to climate change (Devitt et al. 2022). Given the current climate change conditions, there is an increasing need for carbon sequestration, not carbon release, therefore, there is an increasing need to, at a minimum, maintain native plants and not disrupt the surface hydrology of the project site. These indirect impacts should be analyzed in the Final EA with respect to impacts on vegetation, wildlife and special status species including the tortoise. Please include this analysis in the Final EA.

On page 26 of the EA, BLM says “[s]ensitive species habitat could be impacted in the areas being cleared and developed for the construction of new park facilities and as a result of trail system development and improved access to remote areas of the park. Potential Effect Determinations and impacts to listed species are included in the Protected Species Habitat Assessment prepared for both the North and South parcels, dated May 2025.”

We were unable to find this Protected Species Habitat Assessment as one of the documents included on the BLM NEPA ePlanning website for this Proposed Action. The information in this Habitat Assessment is likely crucial to ensuring compliance with NEPA because in the Draft EA, BLM’s analysis of impacts is limited to one sentence quoted above on page 26. Please provide the Protected Species Habitat Assessment with the Final EA for the public to review to comply with NEPA. In addition, please ensure that the analysis of impacts to all resource issues, especially special status species and the tortoise, include the proposed maintenance and new/increased uses from implementation of the Proposed Action.

Also on page 26 is the heading “Environmental Consequences – Biological Resources, Proposed Action, Trail Development and Sonoran Desert Tortoise Habitat Mitigation.” In this section we found no description or analysis of the potential impacts to the tortoise/tortoise habitat from the construction, maintenance, *and use* (emphasis added) resulting from implementation of the Proposed Action. Potential impacts to the tortoise include but are not limited to increased collection for pets by humans; injury or mortality from dogs hiking with owners; crushing tortoises on new roads and parking lots; attracting tortoise predators to the area from food and trash at the project site; introduction spread and proliferation of non-native invasive plant species; increased occurrence of fire size, intensive, and frequency of human-caused wildfires from fuels provided by non-native invasive plant species; and destruction, degradation, and fragmentation of tortoise habitat. Please add to the Final EA these impacts and an analysis of their effects to the tortoise population to comply with BLM’s NEPA Handbook.

Section 3.5.2 (page 36) identifies specific measures intended to avoid or minimize impacts to tortoises and other resources. Among the following bullets, we restate the measure in italicized font, followed by our recommendations in regular font.

- *Survey areas targeted for development of facilities early in the planning process to ensure biological resources are not negatively affected.* There are two types of tortoise surveys, including presence-absence surveys (USFWS 2019), which are intended to determine if tortoises are present on a given site and clearance surveys (USFWS 2009; sometimes referred to as “preconstruction surveys”), which are intended to rescue tortoises from harm’s way prior to ground disturbance. We recommend that the Final EA clarify that this protective measure is referencing clearance surveys (as opposed to presence-absence surveys), which require that areas to be developed are surveyed at least twice along transects spaced at five-meter intervals (presence-absence surveys require one pass along transects at 10-meter intervals) or closer if vegetative cover is dense, and that if tortoises are found, additional surveys are required until no tortoises are found (unlike presence-absence surveys that do not require additional passes).

If tortoises are found during the clearance surveys or at any other time during the construction and maintenance of the proposed action, the AZGFD will determine the appropriate actions to implement to relocate the tortoises to safe habitat. We recommend that a translocation or relocation plan be developed and implemented that complies with the Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance (USFWS 2020).

- *Facilities should be located to avoid **occupied** desert tortoise habitat.* We recommend that this statement be modified to read, “Facilities should be located to avoid ~~occupied~~ **suitable** desert tortoise habitat **and that all occupied habitats be avoided.**” This statement indicates that, insofar as possible, project design should target barren or degraded areas for development and that if tortoises are found in the proposed development area (e.g., newly-constructed trails), adjacent areas should be developed instead. It should be clarified in the Final EA that no active tortoise burrows would be lost to trail construction, as described in Section 2.1 (pages 12 to 18); rather, newly-constructed trails would be relocated a minimum of 10 feet from active burrows, including those that may harbor tortoise nests with eggs. Given the dispersed distribution of trails, construction of trails requiring the use of heavy equipment should be monitored by authorized tortoise biologist(s) to ensure all tortoises and burrows are avoided.

- *If any desert tortoises are encountered in the project area, the contractor shall take any measures necessary to ensure project activities will not harm or disturb any desert tortoise.* We believe that adopting the approach given in the previous bullet will help BLM realize the intent of this bullet. As written, the statement may be interpreted to mean that the contractor, itself, will be responsible for implementing avoidance and protective measures. Rather, we recommend that the following bullet be added to the list of protective measures: “• The contractor will enlist a qualified biologist, authorized by AZGFD, to implement protective measures involving clearance surveys, rescuing and moving tortoises from harm’s way, and implementing other pertinent measures.” One function of the authorized biologist is to interpret and enforce prudent implementation of protective measures, which may not occur if the contractor is given autonomy and discretion to interpret and implement protective measures.

- *The contractor shall require all on-site workers to check under their parked vehicles and equipment prior to driving to make sure there is not a tortoise sheltering underneath the vehicle or piece of equipment. If a desert tortoise is found sheltering underneath a parked vehicle or piece of equipment, the tortoise shall be allowed to move out from under the vehicle on its own **or be relocated** following the current guidelines for Sonoran Desert tortoise handling (AZGFD 2014) before the vehicle can be moved.* As given in the previous bullet, the bold wording may be interpreted to mean that the contractor may relocate tortoises, which should only be accomplished by a qualified, preauthorized biologist. Also, it is important that relocated tortoises be monitored by experienced biologists until the tortoises have resumed normal behavior and are not exhibiting harmful behaviors, such as fence-walking, which may continue to put them in harm’s way.

- *OHV use shall be prohibited to avoid impacts to desert tortoises.* Additionally, we recommend that the following bullet be added: “• The contractor shall install 15 mile per hour speed limit signs throughout the project area and enforce the speed limit.”

• *Educational brochures for visitors informing them about desert tortoise biology, ecology, and management shall be produced.* Additionally, we recommend that the following bullet be added: “• An authorized biologist shall conduct a Worker Environmental Awareness Program (WEAP) to inform construction workers of protective measures to be implemented before, during, and after BLM-authorized development.” If designed appropriately, the brochure mentioned in the original bullet may also be distributed to construction workers during the WEAP.

We note that none of the documented measures addresses human activities including construction that subsidize potential tortoise predators, including common ravens and coyotes, from being attracted into development areas and potentially depredating tortoises. As such, we recommend that the following two bullets (or something similar) be added: “• The contractor shall ensure that closed garbage containers are installed and regularly emptied at authorized landfills to maintain a clean workplace devoid of both organic and inorganic wastes to minimize attraction of tortoise predators.” And, “• The contractor shall ensure that no new sources of water, such as puddles resulting from dust abatement, are created during or following development to avoid subsidizing tortoise predators.”

These measures described above are limited to the construction of the Proposed Action. We found no mitigation measures for the proposed maintenance or use in the Proposed Action. After describing and analyzing the potential impacts from the proposed maintenance and use, BLM should develop and implement appropriate mitigation to offset these impacts and include this information in the Final EA.

On page 37, BLM reports that the “lease holder will monitor for invasive/noxious plant infestations and use methods and strategies outlined in Phoenix District’s integrated Weed Management Plan (BLM 2015).” However, in searching the internet for this reference we were unable to find it or to comment on its effectiveness in successfully managing for invasive or noxious plants. For example, many weed management plans include a list of plant species to be controlled or removed. Unfortunately, new invasive species continue to be identified on public lands. Some weed management plans do not identify all the methods to be used (i.e., manual, mechanical, chemical, biological, and energy) and the need for removal to occur before the plants develop seeds to prevent deposition to the seed bank. In addition, we were unable to find this BLM document in the References section (pages 41 and 42) of the Draft EA.

The impacts from the introduction, establishment, and proliferation of non-native invasive plants include destroying wildlife habitat and forage; threatening endangered species and native plants; increasing soil erosion and groundwater loss; and substantially increasing the size, intensity, and duration of wildland fires that severely degrade/destroy desert vegetation, wildlife habitat, and kill/injure wildlife. We could not find these impacts described or analyzed in the Draft EA. Please include this information and analysis of impacts especially to the tortoise in the Final EA.

In addition, in the Final EA please include BLM’s Weed Management Plan as an appendix or provide a link to this document in the References section, and analyze in the Final EA how the implementation of this Weed Management Plan will or will not successfully halt weed infestations in the area of the Proposed Action.

We appreciate this opportunity to provide the above comments and trust they will help protect tortoises during any resulting authorized activities. 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. Additionally, we ask that you notify the DTC at eac@deserttortoise.org of any proposed projects that BLM may authorize, fund, or carry out in the range of any species of desert tortoise in the southwestern United States (i.e., *Gopherus agassizii*, *G. morafkai*, *G. berlandieri*, *G. flavomarginatus*) so we may comment on them to ensure BLM fully considers and implements actions to conserve these tortoises as part of its directive to conserve biodiversity on lands managed by BLM.

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

Cc: Raymond Suazo, Arizona State Director, Bureau of Land Management,
blm_az_asoweb@blm.gov
Heather Whitlaw, Field Supervisor, Arizona Ecological Services Field Office (Phoenix), U.S.
Fish and Wildlife Service, heather_whitlaw@fws.gov
Joshua Hurst, Deputy Director, Arizona Game and Fish Department, jhurst@azgfd.gov
Tom Jones, Amphibians & Reptiles Program Manager, Arizona Game and Fish Department,
tjones@azgfd.gov

Literature Cited

- Averill-Murray, R.C., P.C. Rosen, C.A. Jones, T.R. Jones, R.A. Lara-Resendiz, T. Edwards, A. Karl, & K.H. Berry. 2023. *Gopherus morafkai*. The IUCN Red List of Threatened Species 2023: e.T97246109A97246177.
<https://dx.doi.org/10.2305/IUCN.UK.2023-1.RLTS.T97246109A97246177.en>
- [AZGFD] Arizona Game and Fish Department. 2014. Guidelines for handling Sonoran desert tortoises encountered on development projects. Arizona Game and Fish Department, Revised September 22, 2014.
<https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/2014%20Tortoise%20handling%20guidelines.pdf>
- [BLM] Bureau of Land Management. 2008. H-1790-1 – National Environmental Policy Act Handbook. National Environmental Policy Act Program, Office of the Assistant Director, Renewable Resources and Planning, Washington, D.C. January 2008.
https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_Handbook_h1790-1.pdf

- [BLM] Bureau of Land Management. 2015. Advancing Science in the BLM: An Implementation Strategy IB 2015-040. March 18, 2015.
<https://www.blm.gov/policy/ib-2015-040>
- [BLM] Bureau of Land Management. 2022. Habitat Connectivity on Public Lands Instruction Memorandum 2023-005.
- [BLM] Bureau of Land Management. 2024. Special Status Species Management. Handbook 6840. September 9, 2024.
https://www.blm.gov/sites/default/files/docs/2024-11/MS%206840%2C%20Rel.%206142_0.pdf
- Devitt, D.A., L. Apodac, B. Bird, J.P. Dawyot, Jr., L. Fenstermaker, and M.D. Petrie. 2022. Assessing the impact of a utility scale solar photovoltaic facility on a down gradient Mojave Desert ecosystem. *Land* 2022, 11, 1315. <https://doi.org/10.3390/land11081315>
- [USFWS] U.S. Fish and Wildlife Service. 2009. Desert Tortoise (Mojave Population) Field Manual: (*Gopherus agassizii*). December 2009. Region 8, Sacramento, California.
<https://www.fws.gov/sites/default/files/documents/Desert-Tortoise-Field-Manual.pdf>
- [USFWS] U.S. Fish and Wildlife Service. 2019. Preparing for any action that may occur within the range of the Mojave desert tortoise (*Gopherus agassizii*). USFWS Desert Tortoise Recovery Office. Reno, NV. October 8, 2019.
https://www.fws.gov/sites/default/files/documents/Mojave%20Desert%20Tortoise_Pre-project%20Survey%20Protocol_2019.pdf
- [USFWS] U.S. Fish and Wildlife Service. 2020. Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance.
<https://www.fws.gov/sites/default/files/documents/Revised%20USFWS%20DT%20Translocation%20Guidance%20and%20attachments.pdf>
- [USFWS et al.] U.S. Fish and Wildlife Service, Bureau of Land Management, Bureau of Reclamation, National Park Service, Department of Defense, Customs and Border Protection, U.S. Forest Service, Natural Resources Conservation Service, Arizona Game and Fish Department, and Arizona Department of Transportation. 2015. Candidate Conservation Agreement for the Sonoran Desert Tortoise (*Gopherus morafkai*) in Arizona. May 27, 2015.
<https://www.blm.gov/sites/blm.gov/files/policies/IMAZ-2016-004-a1.pdf>