



**DESERT TORTOISE COUNCIL**

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**Via email only**

22 April 2020

Doug Whitbeck, Range Management Specialist  
Bureau of Land Management, Lower Sonoran Field Office  
21605 N 7th Avenue  
Phoenix, Arizona 85027  
[BLM\\_AZ\\_PDO\\_SDNMGrazing@blm.gov](mailto:BLM_AZ_PDO_SDNMGrazing@blm.gov)

RE: DOI-BLM-AZ-P040-2020-0001-EA (Sonoran Desert National Monument Resource Management Plan Amendment/Environmental Assessment)

Dear Mr. Whitbeck,

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 management and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the Sonoran Desert National Monument (SDNM) planning area in habitats occupied by Morafka's desert tortoise (*Gopherus morafkai*) (synonymous with "Sonoran desert tortoise"), our comments pertain to the need for increased study of the Sonoran desert tortoise population densities and considerations of the effect of grazing on this species in the Bureau of Land Management's (BLM's) scoping process.

**BLM Proposed Action:** The BLM has opened comment on the scoping process for implementation of the Sonoran Desert National Monument, which will be located southwest of the city of Phoenix. The intent of this process is to review the concerns about and impacts of grazing on the SDNM. These concerns will be considered in the evaluation of the proposed action and reasonable alternatives. We appreciate that BLM's policy is to involve the public in this process.

**Scoping Comments:** The SDNM is located in prime habitat for *Gopherus morafkai*, which is a BLM sensitive species and classified as a “species of greatest conservation need” by the state of Arizona. During the scoping process, we ask for detailed analysis to be performed on the effect of the proposed actions on Sonoran desert tortoise populations and their habitats. And in the outlining of the proposed action and its alternatives, we ask that the options limit or exclude grazing in the areas most relevant to tortoises. Scientific literature continues to suggest that livestock grazing has a detrimental impact on tortoises, including direct mortality, reduction of forage opportunities, soil compaction, etc. (Allison and McLuckie 2018; USFWS 2018).

**Issues and Recommendations:** As the BLM reviews grazing and management options for the SDNM, we ask them to focus on the following items.

**(1) Focus on Managing Lands for Livestock Grazing** – Under 43 Code of Federal Regulation (CFR) 4180.1, BLM is directed to ensure that the following conditions of rangeland health exist:

- (a) Watersheds are in, or are making significant progress toward, properly functioning physical condition, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow.
- (b) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities.
- (c) Water quality complies with State water quality standards and achieves, or is making significant progress toward achieving, established BLM management objectives such as meeting wildlife needs.
- (d) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal Proposed, Federal candidate and other special status species.

Of these, (a), (b), and (d) apply to desert tortoises.

BLM in Arizona has developed Arizona Standards for Rangeland Health. We interpret the *Arizona Standards for Rangeland Health and Guidelines for Grazing Administration's* (BLM 1997, herein “Standards and Guidelines”) as protecting habitats on which tortoises rely, as follows:

### **Standard 3: Desired Resource Conditions**

Desired Resource Conditions – Productive and diverse upland and riparian-wetland plant communities of native species exist and are maintained.

#### **Criteria for meeting Standard 3:**

Desired plant community objectives will be developed to assure that soil conditions and ecosystem function described in Standards 1 and 2 are met. They detail a site-specific plant community, which when obtained, will assure rangeland health, State water quality standards, and *habitat for endangered, threatened, and sensitive species* [emphasis added], as the Mojave desert tortoise is threatened and the Sonoran desert tortoise is a BLM sensitive species. Thus, desired plant community objectives will be used as an indicator of ecosystem function and rangeland health.

**Guidelines:**

**3-2. Conservation of Federal threatened or endangered, proposed, candidate, and other special status species is promoted by the maintenance or restoration of their habitats.**

It is necessary for BLM to identify and evaluate specific attributes of the environment that are needed by tortoises for their survival, growth, reproduction, and recruitment, as required under 43 CFR 4180.1(d). For example, desert tortoises forage on native herbaceous vegetation and need plant species with a high water and protein content, but low potassium content (Ofstedal et al. 2002). Therefore, including these in the evaluation of rangeland health is important.

In general, when given a choice between foraging on native annual herbaceous or woody plant species, cattle select herbaceous plants. We note that BLM issues grazing permits for ephemeral forage in certain allotments during some years. We conclude that it should be important to BLM to determine the species diversity and abundance of native annual herbaceous plants to accurately assess rangeland health for both tortoises and livestock. We request that an assessment of plant species diversity and abundance for native and non-native annual herbaceous plants be added to the methodology for determining rangeland health to comply with 43 CFR 4180.1(d).

**Sonoran Desert Tortoise Candidate Conservation Agreement:** The Arizona BLM is signatory to the Sonoran Desert Tortoise Candidate Conservation Agreement (USFWS et al. 2015). One of the protective measures is to “Ensure adequate forage remains for SDT (Sonoran desert tortoise) following ephemeral use periods.” The agreement has several other measures related to grazing and other land use and management activities. For example, we request that BLM explain in their proposed and alternative actions how Desired Plant Community, Desired Future Condition, invasive plant management, and maintenance or restoration of habitat connectivity (USFWS et al. 2015) are incorporated in the Standards. Through the range health evaluation procedures, BLM should specify how it is ensuring that there is adequate forage quantity and nutritional quality for the Sonoran desert tortoise so that growth, reproduction, and recruitment will occur for this species.

We appreciate this opportunity to provide input and trust that our comments will help protect tortoises during any authorized project activities. Herein, we ask that the Desert Tortoise Council be identified as an Affected Interest for this and all other BLM projects that may affect species of desert tortoises, and that any subsequent environmental documentation for this particular action is provided to us at the contact information listed above.

Regards,



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

## Literature Cited

Allison LJ, McLuckie AM. Population trends in Mojave Desert tortoises (*Gopherus agassizii*). *Herpetological Conservation and Biology*. 2018 Aug 1;13(2):433-52.

[BLM] Bureau of Land Management. 1997. Arizona standards for rangeland health and guidelines for grazing administration. Dated April 28, 1997.

Oftedal, O., S. Hillard, and D. Morafka. 2002. Selective Spring Foraging by Juvenile Desert Tortoises (*Gopherus agassizii*) in the Mojave Desert: Evidence of an Adaptive Nutritional Strategy. *Chelonian Conservation and Biology* 2002; 4(2):341-352.

[USFWS] U. S. Fish and Wildlife Service. 2015. Candidate Conservation Agreement for the Sonoran Desert Tortoise (*Gopherus morafkai*) in Arizona, Phoenix AZ.

[USFWS] U.S. Fish and Wildlife Service. 2018. Range-wide Monitoring of the Mojave Desert Tortoise (*Gopherus agassizii*): 2017 Annual Reporting. Report by the Desert Tortoise Recovery Office, U.S. Fish and Wildlife Service, Reno, Nevada.