



**DESERT TORTOISE COUNCIL**

4654 East Avenue S #257B

Palmdale, California 93552

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

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

**Via email only**

3 June 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 that the *majority* of the Sonoran Desert National Monument (SDNM) area contains Type 1 Sonoran Desert tortoise (*Gopherus morafkai*) habitat, our comments pertain to the effects of the Proposed and Alternative actions on the health of this species. We appreciate that Bureau of Land Management's (BLM) policy is to involve the public in this process.

**BLM Proposed Action:** The BLM's proposed action (Alternative B) would increase grazing on SDNM by greater than 97,000 acres, much of which is within Type 1 Sonoran Desert tortoise habitat. *The Council deems this proposed action to be unacceptable.* The negative impacts of grazing on desert tortoises (and other wildlife) are well documented and include direct mortality, reduction of forage opportunities, soil compaction, etc. (Allison and McLuckie 2018; USFWS 2018). Sonoran Desert tortoises are a BLM sensitive species and the effects of grazing on these populations, which are at the core of its range, must be considered more seriously than represented in the BLM's SDNM Environmental Assessment. The stated economic impact (+\$1,121; +905 AUMs) is trivial relative to the long-term detrimental impact of continued (or increased) grazing on these allotments.

**The Council favors Alternatives C:** The Council believes Alternative C (no grazing) is the only viable option for the health and welfare of desert tortoise populations.

**Sonoran Desert Tortoise Candidate Conservation Agreement:** The Arizona BLM is signatory to the Sonoran Desert Tortoise Candidate Conservation Agreement (UFWS 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. We note that BLM did not explain in their proposed and alternative actions how maintenance or restoration of habitat connectivity (USFWS et al. 2015) are incorporated in the Standards (BLM 1997, herein “Standards and Guidelines”).

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 continue to 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.