



DESERT TORTOISE COUNCIL

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Via email only

11 August 2020

Michael Daehler
U.S. Department of the Interior
Bureau of Land Management
Lower Sonoran Field Office
21605 North 7th Avenue
Phoenix, Arizona 85027
mdaehler@blm.gov

RE: Vekol Valley Sonoran Pronghorn Release (DOI-BLM-AZ-P040-2020-0004-EA)

Dear Mr. Daehler,

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.

We appreciate this opportunity to provide comments on the above-referenced project, and that the BLM contacted us directly about the intent to release pronghorn into tortoise habitats. Given the location of the proposed project in habitats likely occupied by Morafka's desert tortoise (*Gopherus morafkai*) (synonymous with "Sonoran desert tortoise"), our comments pertain to enhancing protection of this species during activities authorized by the BLM. Please accept, carefully review, and include in the relevant project file the Council's following comments in the Project Area.

Page numbers referenced throughout this letter relate to the Draft Environmental Assessment (Draft EA), dated July 2020 (BLM 2020). The purpose of the EA is given on page 1: “The Bureau of Land Management (BLM), in cooperation with the Sonoran Pronghorn Recovery Team, a binational group of scientists and land managers, is proposing to release [5 to 20 of] the endangered Sonoran pronghorn (*Antilocapra americana sonoriensis*) on BLM-managed lands on the Sonoran Desert National Monument (SDNM) south of Interstate-8 (I-8) (Project Area).”

With regards to the list of statutes, regulations, or plans applying to BLM-managed lands within the Project Area (see Section 1.4, page 2), since BLM is signatory to the Candidate Conservation Agreement for the Sonoran Desert Tortoise in Arizona (herein “CCA;” USFWS et al. 2015) and a member of the Arizona Interagency Desert Tortoise Team, we ask that the CCA be added to the list in Section 1.4. And, as such, that the BLM implement all pertinent Arizona Game and Fish Department (AGFD) guidance on Sonoran desert tortoises given in the CCA as they pertain to tortoise protection preparing for and during the release.

Section 2.1, page 3, states in part: “The temporary enclosure would be constructed by volunteers, BLM and AGFD staff. The enclosure would be constructed of t-posts and weld wire mesh fencing covered with a tarp to obstruct the view of activities outside the enclosure and would be approximately six feet high. ... weld wire mesh fencing and electrical fence would be removed after the Sonoran pronghorn release in January 2021. The t-post may be left in place for a potential second release in December of 2021, after which, the t-posts would be removed. The perimeter fence does not need to be straight and can be placed to avoid vegetation as much as possible, although some vegetation trimming would be required. The perimeter of the fence would be approximately 3,700 feet in length. It is also reasonable to assume that some vegetation may be trampled during the installation and removal of the fence.”

Pending input from pronghorn experts, we recommend that the dimensions of the mesh size of the weld wire fencing be two inches vertical and one inch horizontal, which has proven in California to be an appropriate size to avoid entrapping lizards, snakes, and small mammals in smaller mesh sizes. The two-inch vertical dimension is important to preclude hatchling tortoises from entering sites through fences with larger mesh sizes.

In this region, our understanding is that tortoises are mostly resident in mountainous areas and make long-distance trips across desert plains. Since the fence could be installed around the 20-acre site as early as October during the tortoise’s fall heightened activity period, we recommend that knowledgeable tortoise biologists be enlisted to survey the 20-acre area prior to fence installation to ensure no tortoises will be entrapped within the fence. The best available survey protocol is given in U.S. Fish and Wildlife Service (USFWS 2019). It is advisable that a tortoise biologist with handling experience be available if a tortoise needs to be rescued from the fenced area and displaced outside the fence.

It is not clear from the following description on page 3 if the water facilities will be open and available to subsidize tortoise predators, including common ravens and coyotes, or if it will be covered? “Up to five temporary waters would be placed in the vicinity to the release area (Figure 1). The temporary waters would consist of 1,500 to 2,500-gallon water storage tank(s) and trough(s).” If it is feasible, it may be advisable to construct a tarp over the water facilities (as with the temporary enclosure) to discourage ravens from using the new water sources. Assuming these water troughs are aboveground and not buried at ground level, please be sure that the sides of the troughs are a minimum of 18 inches tall so there is no chance of tortoises drowning in them. Similarly, with regards to the permanent well, please be sure it does not entrap tortoises.

With regards to the following statement on page 3 and our concerns of subsidizing tortoise predators given above, we recommend that the temporary water sources be removed as soon as possible, pending input from pronghorn experts: “The AGFD in cooperation with the Sonoran Pronghorn Recovery Team would decide when the temporary waters would be removed.” Please consider these same concerns in converting the existing BLM well at Vekol Valley into a permanent water source, and identify measures, if any, that may allow for pronghorn use while precluding raven use.

We appreciate that several noxious weed species have been identified in the area (page 6). We recommend that BLM or other knowledgeable biologists monitor the disturbed areas within the 20-acre enclosure and along the fence line for noxious weeds for several years and initiate weed control [particularly for Sahara mustard (*Brassica tournefortii*)], if needed.

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 project 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

[BLM] U.S. Bureau of Land Management. 2020. Vekol Valley Sonoran Pronghorn Release. Unpublished Draft Environmental Assessment prepared by Lower Sonoran Field Office of the BLM. Phoenix, AZ.

[USFWS et al.] U. S. Fish and Wildlife Service and Cooperating Agencies comprising the Arizona Interagency Desert Tortoise Team. 2015. Candidate Conservation Agreement for the Sonoran Desert Tortoise (*Gopherus morafkai*) in Arizona. Phoenix AZ.

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.