



**Western
Watersheds
Project**

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Working to protect and restore Western Watersheds

January 7, 2011

Jim Kenna, Arizona Director
Bureau of Land Management
One North Central Avenue
Suite 800
Phoenix, AZ 85004-4427

RE: Request for information regarding BLM's intentions to protect Sonoran desert tortoise and its habitat on Arizona's public lands

Dear Director Kenna,

As we discussed at our December 29th meeting, the United States Fish and Wildlife Service (Service) recently determined that the Sonoran desert tortoise warranted listing under the Endangered Species Act.¹ They also determined that actual listing at this time was precluded due to higher priorities. The findings were made subsequent to a petition submitted by Western Watersheds Project and WildEarth Guardians in October 2008.

We request that you explain in writing what the agency intends to do to address conservation of the Sonoran desert tortoise in response to this change in status, and what specific directions the State Office will be providing to the Field Offices with respect to livestock grazing in desert tortoise habitat.

The Service determined that the Sonoran desert tortoise "is in danger of extinction in the foreseeable future throughout all or a significant portion of its range"² due, in part, to the inadequacies of management on its public land habitat, including Bureau of Land Management³ lands. Specific causes of endangerment include invasive and non-native plants, wildfire, habitat fragmentation, livestock management, overutilization and collection, climate change and environmental contamination, vehicle strikes, and an inadequacy of existing regulatory mechanisms.

BLM policy requires the agency to initiate proactive conservation measures to reduce or eliminate threats to Bureau-listed sensitive species to minimize the likelihood of and need for listing of these species under the ESA.⁴ Because current management is not sufficient to prevent this species' imperilment, the BLM must therefore act to address these inadequacies.

¹ 75 FR 78094-78146, December 14, 2010.

² *Ibid.* at 78139.

³ *Ibid.* at 78128.

⁴ BLM Manual 6840 – Special Status Species Management, December 2008.

The Service concluded “grazing effects to Sonoran desert tortoise may occur but are likely limited in severity and scope in Arizona because habitat shared by livestock and Sonoran desert tortoises is not a significant proportion in most areas of Arizona, and because livestock grazing in Arizona is actively management by land management agencies.”⁵ While we disagree with the Service’s conclusions regarding the scope and severity of grazing impacts, their recognition that “grazing effects to Sonoran desert tortoise may occur but are likely limited in severity and scope” emphasizes the need for the land managers to monitor impacts and incorporate sound conservation measures when undertaking site-specific NEPA evaluations to ensure that the effects are, in fact, limited.

We look forward to reading your response within 30 days. If you have any questions, please feel free to contact either Ms. Anderson or Dr. Connor using the contact information provided below.

Yours sincerely,



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⁵ 75 FR at 78120.