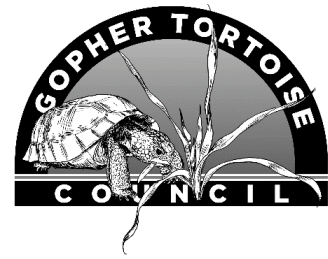


Mr Joseph Edmonds
Southeastern States District Office
U.S. Bureau of Land Management
7/21/2026



Dear Mr. Edmonds,

The Conecuh National Forest is home to the only viable population of Gopher Tortoises on public land in Alabama and has been the subject of seminal research on rare animal and plant communities. Research has shown that the Gopher Tortoises in Conecuh maintain important connectivity among local populations across the entire national forest¹, and are particularly sensitive to habitat management^{2,3}. The U.S. Fish and Wildlife service found that, although the Gopher Tortoises in south-central Alabama are more vulnerable than the rest of the species' range, **federal protection under the Endangered Species Act was not warranted in part because of the protected status of tortoises in Conecuh National Forest** ⁴.

The BLM's proposed five new oil and gas drilling leases would directly affect 2,263 acres located in and between existing tortoise sites. These activities would degrade habitat directly and indirectly, interfere with prescribed fire operations essential for ecosystem health, hazard reduction, and increase heavy-vehicle traffic and road mortality of Gopher Tortoises, already a critical threat to this population. In doing so, the leases **would undermine the very rationale the federal government relied on in declining ESA protection for this portion of the species' range**. We therefore urge the BLM to withdraw this proposal.

Conecuh National Forest has also, for the last 16 years, served as Alabama's only site, and the first, in the Southeast for an ambitious, multi-partner effort to repatriate the federally threatened Eastern Indigo Snake. This federally protected snake depends on Gopher Tortoise burrows for refuge and reproduction, and collaborative work at Conecuh has identified road mortality and habitat quality and connectivity as key drivers of its survival^{5,6}. New drilling leases in the center of these long-running conservation investments would put at risk more than a decade of public restoration effort and undermine outcomes that federal and state agencies have spent years pursuing. Although energy security is important, it should not come at the expense of one of Alabama's highest-value conservation landscapes.

Thank you for your consideration of this comment, and we respectfully urge the BLM to abandon the proposed leases.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "K Loope", with a long horizontal flourish extending to the right.

Kevin Loope, PhD

Co-chair, on behalf of the Gopher Tortoise Council

¹ Krohn, A. R., Folt, B., Apodaca, J. J., Guyer, C., & Goessling, J. M. (2024). Using genomic data to estimate population structure of Gopher Tortoise (*Gopherus polyphemus*) populations in southern Alabama. *Conservation Genetics*

² Folt, B. P., Goessling, J. M., Tucker, A. M., Guyer, C., Hermann, S. M., Shelton-Nix, E., & McGowan, C. P. (2021). Contrasting patterns of demography and population viability among gopher tortoise (*Gopherus polyphemus*) populations at the species' northern range edge. *Journal of Wildlife Management*, 85(4), 617–630

³ Aresco, M. J., & Guyer, C. (1999). Burrow abandonment by gopher tortoises in a slash pine plantation of the Conecuh National Forest. *Journal of Wildlife Management*, 63(1), 26–35.

⁴ U.S. Fish and Wildlife Service. (2022). Endangered and threatened wildlife and plants; finding for the gopher tortoise eastern and western distinct population segments. *Federal Register*, 87(196), 61834–61881.

⁵ Stiles J. (2013). Evaluating the use of enclosures to reintroduce eastern indigo snakes (*Drymarchon couperi*). M.S. Thesis, Auburn University, Auburn, Alabama, USA.

⁶ Erickson, F. T. (2023). Monitoring strategies and occupancy analysis for the reintroduced eastern indigo snake in Conecuh National Forest, Alabama. M.S. Thesis, Auburn University, Auburn, Alabama, USA.