

August 4, 2006

Mr. J. Daniel Sullivan, Jr.
Endangered Species Coordinator
Gopher Tortoise Management Plan Comments, DHSC
Florida Fish and Wildlife Conservation Commission
620 S. Meridian St., M.S. 10
Tallahassee, FL 32399-1600
via email to daniel.sullivan@myfwc.com

Re: Audubon of Florida's Recommendations for the proposed Gopher Tortoise Management Plan

Dear Mr. Sullivan:

We applaud the FWC for its recent move to upgrade the gopher tortoise from its current status as a species of special concern to a threatened species under the state's new listing protocol. Uplands and upland species like tortoises have long languished in the shadow of wetlands and their necessary, high-profile protections. Though uplisting the gopher tortoise indicates the unfortunate status of the species within Florida, it is an important step forward for the conservation of the tortoise and the numerous plant and animal species that will benefit from improved management of tortoise habitat. To this end, we recommend the following components in your forthcoming Gopher Tortoise Management Plan.

End All Take Permits

The FWC's work with the Gopher Tortoise Stakeholder Group is moving in the right direction: away from entombment and towards viable relocation strategies. An end to entombment is very desirable to a large segment of the general public; the FWC should use this as leverage to elevate the importance of uplands in the public consciousness and educate Floridians about the reality of needing healthy uplands to which these tortoises may be transferred.

Commitment to Long-term Management

All relocation and mitigation strategies must include long-term financial commitments to habitat restoration and management. Tortoises are extremely long-lived organisms and it is possible for adult tortoises to survive for quite some time in substandard habitat. It is critical that tortoises have habitats of sufficient quality to ensure viable, robust populations. Colony monitoring should include assessments of habitat quality as well as tortoise reproduction and recruitment to ensure the population is sustainable over the long-term. Management guidelines should consider the diverse array of habitats on which tortoises live, and should take into account the needs of all resident species. This may require slightly different approaches to management for different colonies (e.g., return frequencies for fire events and invasive plant and animal management may differ among locations).

Make Insufficient Land Management Equivalent To Take

Fire exclusion makes once-appropriate habitat unsuitable for tortoises and most other resident species, including the numerous burrow commensals. Albeit slower, this is a form of take just like poaching or entombment. Developers should not be the only landowners held to the no-take standard. Agricultural landowners and public land managers have a role to play in gopher tortoise conservation. In particular, public land managers should account annually to FWC for their acreage burned and burn cycles to ensure

they sustain existing or relocated populations of tortoises. Poaching remains a significant threat to tortoises and must be addressed through increased outreach and enforcement efforts.

Develop Strategy for Widespread Improvement of Habitat Management

Many uplands are declining in quality and can no longer support the entire suite of their historic faunas. Common problems include fire suppression and increasing numbers of invasive species (including nuisance species like raccoons and domestic pets which have the capability of eliminating young tortoises from large areas). Even when appropriate management techniques are well understood, there are often constraints on their use (e.g., suppression of fire due to public safety, liability, public agency budget or staffing shortages, or inconvenience). It is critical that FWC work to improve management strategies for gopher tortoise habitat, including their ability to implement these strategies once identified (see below for one recommendation related to land use decisions). Management strategies for gopher tortoises should be coordinated with other likely listed species sharing the same upland habitat, such as red-cockaded woodpeckers and burrowing owls. Additionally, the FWC should take steps to further its feral cat policy. While the devastating impacts of feral cats on avifauna are commonly cited, their impacts on gopher tortoises are equally egregious and should be addressed in this management plan.

Increase FWC Involvement in Planning and Land Use Decisions

Conservation biology and land use planning should not be considered discrete disciplines. Since development has such a profound impact on Florida's wildlife, including gopher tortoises, it is incumbent upon the FWC to engage in the planning and land use decision-making processes. FWC should consult with DCA on how best to integrate with land use planning functions. Educational materials should be developed and directed to Regional Planning Councils and the regulatory and land use planning departments of local governments. FWC staff must work with these entities to find the most effective opportunities for FWC talent to shape development and other land use decisions impact tortoises and uplands.

Much-needed Public Outreach and Education

Using anti-entombment sentiment as a springboard, FWC should engage the public in a dialogue identifying uplands as a finite resource that requires ongoing management. Materials should be created for private landowners with tortoises, identifying management needs and resources available to help these private individuals do their part.

We look forward to reviewing the first draft of your Gopher Tortoise Management Plan and thank you for this opportunity to contribute to its development.

Sincerely,



David Anderson
Executive Director
Audubon of Florida