



To whom it may concern:

The Gopher Tortoise Council was formed in 1978 by a group of southeastern biologists and other citizens concerned with the decline of the gopher tortoise. The goals of the Council are: (1) to offer professional advice for management, conservation, and protection of gopher tortoises; (2) to encourage the study of the life history, ecology, behavior, physiology, and management of gopher tortoises and other upland species; (3) to conduct active public information and conservation education programs; (4) to seek effective protection of the gopher tortoise and other upland species throughout the southeastern United States. The Council is committed to science-based conservation, and as such supports using research to inform policy and management activities.

In response to the Florida Fish and Wildlife Conservation Commission's Executive Order No. EO 21-27, which authorizes deviations from the current Florida Gopher Tortoise Permitting Guidelines, the Gopher Tortoise Council raises the following concerns. First, deviation #2 allows relocation of tortoises more than 100 miles to the north or south. This will result in loss of regionally significant populations in the rapidly developing Florida peninsula. Deviations 4d and 4e authorize "temporary" relocation of tortoises either on-site (4d) or to public lands (4e), which puts both relocated and resident tortoises at risk of disease or other harm from overstocking, or multiple relocations from temporary to permanent recipient sites, or unsuitable habitat (particularly for on-site) with lack of adequate monitoring. EO 21-27 is not supported by science and is in opposition to work being done by the Gopher Tortoise Technical Assistance Group and the tortoise research community.

This statement has been approved by the Executive Committee of the Gopher Tortoise Council.

Becca Cozad, Senior Co-Chair