



The Gopher Tortoise Council was formed in 1978 by a group of biologists and other citizens concerned with the decline of the gopher tortoise. Our volunteer-led organization offers professional advice for management, conservation and protection of gopher tortoises and encourages and supports research and outreach on the ecology and management of gopher tortoises and their habitats. As such, we offer comments below on the Florida Fish and Wildlife Conservation Commission's proposed **2024 Gopher Tortoise Management Plan**. We greatly appreciate FWC's consideration of these comments as well as those provided by our organization on the initial Draft GTMP earlier this year. We look forward to seeing the 2025 detailed report on significant conservation work achieved by FWC and conservation partners in Florida as a result of implementation of the 2012-2022 management plan.

First and foremost, we strongly support the intent of the proposed 2024 plan, which is to eliminate the need for state listing of the gopher tortoise as a Threatened species in Florida.

We also support:

- continuation of the efforts of signatories of the Gopher Tortoise Candidate Conservation Agreement (CCA), which were directly responsible for implementation of rigorous monitoring protocols for gopher tortoises (P.18).
- research to better predict and understand the implications of rapid development on gopher tortoise populations in Florida (P.21). Despite translocation of tortoises from development sites, declines in habitat and populations have continued. Moreover, recent published studies suggest that there has been significant mortality of translocated tortoises in some populations.
- an evaluation of the efficacy of agricultural and silvicultural wildlife best management practices (P.27). As noted in our original review of the 2012 Management Plan we also encouraged efforts to identify and close potential loopholes used by developers to avoid relocating tortoises.
- continuation of the Gopher Tortoise Technical Assistance Group, which brings stakeholders together for FWC facilitated discussion of issues related to gopher tortoises (P.40).
- the emphasis on use of prescribed fire to maintain upland habitats for gopher tortoises (P.51).

We have remaining concerns about the following:

- We strongly encourage FWC to obtain population data for additional public lands, to ensure no net loss across all public conservation lands (P.21).
- Development pressure and other threats seem likely to increase over the next 10 years, so flat annual targets for acquisition and protection of habitat may be inadequate (P.24). Increasing targets in years 1-5 would probably improve prospects for tortoises in the long term.
- We support proposed actions 33-36 but encourage the Florida legislature to ensure adequate funds are available for the FWC technical staff and law enforcement needed to accomplish this (P.28).
- We strongly encourage FWC to consider reevaluating gopher tortoise populations every 5-10 years using Line Transect Distance Sampling as part of their long-term monitoring goals (P.23).