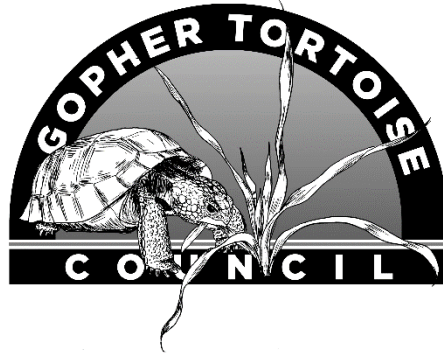




April 19, 2022

Ms. Mara Gambineri, Chair of FCT Governing Board
and Governing Board Members
c/o Lois LaSeur - Senior Assistant General Counsel
by email: Lois.LaSeur@dep.state.fl.us

Florida Communities Trust (FCT)
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 550
Tallahassee, Florida 32399-3000

Re: Agenda Item #7, FCT Governing Board Meeting on April 20, 2022
Request for Modifications to Split Oak Forest Wildlife and Environmental Area Management Plan

Dear Florida Communities Trust Governing Board members,

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 and their associated habitats. 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 Gopher Tortoise Council is deliberately judicious in providing comments or positions on specific issues of land development**, as we believe it is critical that this organization maintain its credibility as rooted in science-based conservation and advocacy through liaising with a diversity of stakeholders.

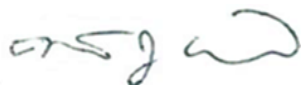
However, we are expressing our strongest opposition to the request from Orange and Osceola Counties for a modification plan to allow for construction of a linear facility through Split Oak Forest Wildlife Environmental Area. We ask that the FCT Board vote to “**Not approve**” item 7 as proposed. This development request is a significant threat to conservation successes at Split Oak Forest and is also a grave threat to the state’s numerous conservation successes. There is no *bona fide* conservation rationale for this proposal. Our concern that this project threatens conservation successes is based on numerous lines of independent evidence.

First, a recent Florida Natural Areas Inventory survey (FNAI Project #043816, 2019) documented the presence of a viable population of gopher tortoises on this site. Viable populations are those most likely to persist into the future and maintenance of gopher tortoise populations in the Florida peninsula remains a great conservation challenge for the state. As evidenced by the Florida Fish and Wildlife Conservation Commission's own series of executive orders (EO 21-27, EO 22-06), the state of Florida is facing an unsustainable burden to develop private lands. Up to this point, Split Oak Forest has been a model of how conservation can (and must) work on public lands. While Split Oak Forest contains a healthy and viable population of gopher tortoises, it has also been the focus of intensive state sponsored conservation efforts to maintain this tortoise population, including several conservation easements held by the Florida Fish and Wildlife Conservation Commission and other agencies. The development at this site will compromise the viability of this population, not only affecting the tortoise population itself, but also damaging the taxpayer efforts and violating the public trust that has been committed to conserving this site. There are 1,550 acres of donation lands that the counties will receive as currently proposed and contingent upon approval of this linear corridor project – and these lands are principally located in wetlands that cannot support tortoises, suggesting a near complete loss of tortoise acreage.

Second, many of the tortoises at Split Oak Forest were moved there as the result of mitigation from development sites elsewhere in the peninsula. The fundamental need and assumption of mitigation for development is that mitigation sites are maintained in perpetuity to ease the burden of development on natural ecosystems. If mitigation sites are not protected from development (such as is being proposed at Split Oak Forest), then there is no assurance that current conservation planning has a chance to succeed. If this mitigation site is compromised in favor of development, it will establish one of the most dangerous precedents for conservation, particularly for gopher tortoises, since the Gopher Tortoise Council's founding.

We respectfully ask that the FCT reject this proposal outright, because it will irreparably damage the integrity of one of the most important and sensitive natural areas remaining in the Florida peninsula and set a precedent of prioritizing development over the protection of established conservation land.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rebecca Cozad" followed by a flourish.

Rebecca Cozad and Matt Elliott

Co-Chairs, Gopher Tortoise Council

On behalf of the Gopher Tortoise Council Executive Committee