

Lisa Smith

From: Office of Commissioner Passidomo
Sent: Friday, February 25, 2022 3:13 PM
To: Commissioner Correspondence
Subject: FW: Docket #20200226-SU

Please place the e-mail below in Docket No. 20200226.

Thank you!

From: kjell <kjellone@gmail.com>
Sent: Friday, February 25, 2022 3:10 PM
To: Office of Commissioner Passidomo <Commissioner.Passidomo@psc.state.fl.us>
Subject: Docket #20200226-SU

Dear Commissioner Passidomo,

The magnitude of the project proposed by Environmental Utilities *RE: Wastewater on Bridgeless Barrier Islands*, will have a devastating impact on hundreds of animals which live on County land and Private property in the subject project area.

Animals including bobcats, opossums, armadillos, snakes, owls, numerous birds and gopher tortoises are but a few animals that roost, nest, shelter, and forage on the land which will be disturbed.

Since 2008, I have worked with the Gopher Tortoise species on Thornton Key, Knight and Don Pedro Islands, holding a Gopher Tortoise Agent certification (GTA-10-00063) with FFWC, Florida Fish and Wildlife Commission, and from 2017 to present a Registered Agent (RAG-17-00047) with FFWC.

Closely working with Charlotte County's *Code Compliance; Natural Resources; Environmental Specialists; Community Development; Planning and Zoning*, I also affiliate with The Department of Environmental Protection; West Coast Inland Navigation; FFWC State Marine Turtle Program; and, other Environmental groups.

Currently I serve on the board of Bocilla Islands Conservancy, Inc. and also serve as Team Lead for The BICI Gopher Tortoise Conservation Team.

LET'S EXAMINE the GOPHER TORTOISE ... as it pertains to project

The Gopher Tortoise is listed as a THREATENED species, as well as a PROTECTED KEYSTONE species. Its burrow is shared with as many as 350 other animals referred to as commensal species, meaning the species all benefit from the association, and obtain nutrients, shelter, support, or locomotion from the host species.

Gopher Tortoises use multiple burrows and *forage on nearly one hundred low growing foliage plants all of which are essential for the diet this animal.* (Pat Ashton 2008). The tortoise must travel freely among and thru multiple properties to forage in order to satisfy its diverse dietary needs.

The interruption of free roaming due to vegetation clearing, grading, construction, digging, heavy equipment, or staging areas for supplies as the project would entail, would be quite disruptive and dangerous to the health of this species. Stress is proven to be the major cause for reduced immunity subjecting the Gopher Tortoise to illness. (Katherine Gentry)

The hazards and risk of falling into or being trapped in holes, trenches, and the like place the vulnerable tortoise at great risk of injury or death.

FFWC Guidelines states if *“you cannot permanently avoid all tortoise burrows on the development site by 25 feet or more, and suitable habitat will remain on-site following site development”*, the burrow must be excavated. * Island lots are 80 feet wide.

In accordance with this guideline, there will be hundreds of Gopher Tortoise burrows excavated and hundreds will need to be relocated. * There are 1-15 burrows per lot.

WHAT IS THE COST TO EXCAVATE A BURROW & RELOCATE A TORTOISE?

Let's Use a Realistic Example of a "3 Burrow Property"

- Consult & Burrow survey. \$1300
- Excavation of burrow. \$1300-1500 *per burrow* x3 \$3900- \$4500
- FFWC permit in which the 25 ft rule exists. \$250
- A project of this size may impact whether Gopher Tortoises will remain in their home range, likely they will be relocated to a state approved reserve.
\$2500 *per tortoise* x3 \$7500 **some consultants are billing @\$6000 per tortoise*

Note: As of February, 2022 there is a moratorium on relocating tortoises to all reserves, due to holding capacity. All are operating at maximum capacity. It is unknown when or if this situation will be remedied.

THE TOTAL COSTS FOR ABOVE SCENARIO: \$12,950 – 13,550.

WHO BEARS THOSE COSTS?

What if there are 5 burrows? (20,550)

or, 8 burrows? (31,000)

A few other Facts...

- From 2007-2009, ten island residents were extensively trained on *Gopher Tortoise Natural History; Habitat and Forage; Handling and Care; Data Gathering; as well as hands on Field Work*, by world renown Patricia and Ray Ashton, Ashton Biodiversity Research and Preservation Institute, Inc.
- The islands have served as an example for the State of Florida in demonstrating what stake holders can do in protecting a threatened species.
- Resident yards have been certified and registered by FFWC in the Gopher Tortoise Friendly Yard program.
- The Gopher Conservation Team was asked for input by FFWC in the development of the Friendly Yard program.
- Residents are enamored with Gopher Tortoises and to that end, have landscaped to attract tortoises and many of the commensals. That **habitat will be destroyed**.

Thank you for your time in reading my comments. Hoping you have a pleasant day.

Respectfully,

Kjell Plotkin

Kjell Plotkin
Resident, Don Pedro Island
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