



SOUTHERN GROUP OF STATE FORESTERS

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November 15, 2019

Regional Director (TE),
U.S. Fish and Wildlife Service
1875 Century Boulevard, Suite 200
Atlanta, GA 30345

RE: Gopher Tortoise (Eastern Population) Species Information – Candidate Notice of Review

To Whom it May Concern,

The Southern Group of State Foresters (SGSF) appreciates the opportunity to provide the enclosed information on the eastern population of the gopher tortoise to the US Fish and Wildlife Service (USFWS) in response to the Candidate Notice of Review posted in the Federal Register on October 10, 2019 (Docket No. FWS–HQ–ES–2019–0009). SGSF is a non-profit organization that represents the State Foresters from 13 southern states, Puerto Rico and the US Virgin Islands, and whose mission is to provide leadership in sustaining the economic, environmental, and social benefits of the south's forests. To achieve this mission SGSF works with many partners across the south and nation to identify and address existing and emerging issues and challenges that are important to southern forests and citizens, which includes conservation of endangered, threatened and candidate species and their forested habitats.

The entire range of the eastern population of the gopher tortoise (from here forward referred to simply as gopher tortoise) falls within our region, in the states of Florida, Georgia, Alabama and South Carolina. Being that the gopher tortoise is a forest habitat dependent species (described in the Notice of Review as typically inhabiting sandhills, pine/scrub oak uplands, and pine flatwoods associated with the longleaf pine ecosystem), our state foresters in those four states have been directly involved in helping support the population growth over the past decade on both public and private land. The increased focus on restoration of the longleaf pine ecosystem is one of the great conservation success stories of our region, and has served to increase the habitat potential for the gopher tortoise. In addition, through partnerships with state wildlife agencies and other stakeholders, our state foresters place a specific focus on management for gopher tortoises through thinning and prescribed fire where ecologically appropriate in multiple different forest types.

With this backdrop in mind, we would like to share data on the known populations of gopher tortoise on state forestry agency owned land within the species range, as well as additional pertinent population and habitat data. This data is summarized in Table 1. More robust data sets are being presented to the USFWS by state wildlife agencies in each state as well.

Table 1 - Eastern Population of Gopher Tortoises Found on State Forests		
State Forest	Survey Year	Population
Florida		
Etoniah Creek SF	2015	1538
Goethe SF Levy Co. – Main Tract	2014	2039
Indian Lake SF	2018	622
Jennings SF	2017	3828
Ralph E. Simmons SF	2017	1408
Twin Rivers SF – Blue Springs Tract	2017	2498
Twin Rivers SF – Ellaville Tract	2017	1189
Withlacoochee SF – Citrus Tract	2015	7179
Withlacoochee SF – Croom Tract	2016	8221
Blackwater River SF – West Boundary Unit	2016	284
Total		28806
Georgia		
Dixon State Forest	2014	500+
Broxton Rocks State Forest	2013	189
Alabama		
Geneva State Forest	2014	600
Little River State Forest	2019	50 (est)

The Florida Forest Service (FFS) supports a total of at least 28,806 gopher tortoises across eight state forests. In addition to these individuals documented in formalized, standardized surveys conducted by the state wildlife agency, virtually all of the 37 Florida state forests have some number of unsurveyed tortoises. More information on surveyed gopher tortoise populations across all landownerships in Florida can be found in an attachment to these comments. FFS manages 392,842 acres of longleaf pine habitat across its state forest network, which in conjunction with other forest types provides ample habitat for gopher tortoises.

Georgia Forestry Commission (GFC) has two state forests that support gopher tortoise populations. The Dixon State Forest has a viable population with over 500 individuals. The Broxton Rocks State Forest also supports a viable population of 189 individuals, and is located adjacent to the Flat Tub Wildlife Management Area which has an additional viable population of 341 individuals. GFC is involved in timber harvests on all state lands and also assists in reforestation. Gopher tortoise burrows are marked and protected during harvests, site preparation, planting and prescribed burning.

Alabama Forestry Commission (AFC) has two state forests that support gopher tortoise populations. Geneva State Forest, a 7,200-acre forest in Geneva County, has approximately 600 tortoises at a density of .26/ha. While not currently meeting the specifications for a “minimum viable population”, AFC continues to manage this forest for longleaf pine and tries to burn on a two-year rotation to support gopher tortoise habitat. Little River State Forest also has a gopher tortoise population but at a lower density than Geneva State Forest. While no formal population surveys have been conducted to date, staff observations on the forest estimate somewhere between 25-50 gopher tortoises located on 4-5 sites across the 2,000-acre forest. Gopher tortoise habitat at Little River State Forest is improving over recent years due to re-establishment of longleaf pine and regular use of prescribed fire. AFC is also in the process of acquiring an additional 2,800 acres adjacent to the Little River State Forest which is prime gopher tortoise habitat. Future forest management activities will include practices beneficial to gopher tortoises and other TES species.

South Carolina Forestry Commission (SCFC) has no known gopher tortoise populations on state forest lands.

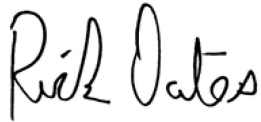
In addition to managing State Forests, our member agencies are also a critical resource for private landowners in making forest management decisions. Across the gopher tortoise range, state forestry agency personnel play an active role in helping landowners make tortoise-friendly management decisions in all appropriate forest types, encouraging longleaf pine habitat restoration where it fits with landowner objectives, and connecting landowners with the proper wildlife authorities to survey and manage for gopher tortoises. Our agencies are often the first call a landowner makes when wanting to make informed management decisions for their forests, and as such we play an integral and ongoing role in fostering the growth in gopher tortoise habitat across the region.

More information on the growth in longleaf pine acreage (a key habitat for gopher tortoise) and annual longleaf pine accomplishments in each of these four states can be found on the website for the America’s Longleaf Restoration Initiative, which both SGF and the USFWS are a part of (<http://www.americaslongleaf.org/resources/>). The most recent annual accomplishment report details 1.2 million acres of longleaf pine planted and 10 million acres of prescribed fire conducted in longleaf pine ecosystems in the past 10 years. In 2018 alone, roughly 930,000 acres were planted or actively managed for longleaf pine in Florida, Georgia, Alabama and South Carolina (<http://www.americaslongleaf.org/media/43795/2018-accomplishment-report.pdf>). The growth of this ecosystem has been crucial to the associated growth in gopher tortoise populations.

It is important to recognize that the increased abundance of the gopher tortoise over the past decade has been due, in part, to the ability to conduct active forest management. Tree thinning and prescribed burning within longleaf and other pine stands is critical to maintaining quality gopher tortoise habitat. In addition, the restoration of the longleaf pine ecosystem and the conservation of pine-dependent species (such as gopher tortoise) is an example of how carrots often work better than sticks. Absent any regulatory requirements, public and private stakeholders across the region have made great conservation strides through voluntary initiatives. As the USFWS considers listings for the gopher tortoise as well as other species in our region dominated by privately owned forests, we urge you to recognize the success of and further promote voluntary conservation initiatives in lieu of federal regulation.

We would like to thank the USFWS for their ongoing partnership in the conservation of gopher tortoise and other wildlife species that call our region home. It is only through strong partnerships on public lands and innovative programs that encourage landowners to prioritize conservation on private lands that our southern wildlife will thrive into the future. Please feel free to contact us if you need additional data on state forest gopher tortoise populations, longleaf pine restoration efforts, or anything else forestry related in the south.

Sincerely,

A handwritten signature in black ink that reads "Rick Oates". The signature is written in a cursive, slightly slanted style.

Rick Oates
State Forester, Alabama Forestry Commission
Chair, Southern Group of State Foresters

Gopher Tortoise Population Survey Results on Conservation Lands in Florida

Table 1. Summary of line transect distance sampling (LTDS) results for gopher tortoise (*Gopherus polyphemus*) populations on conservation lands in Florida from 2014 – November 2019. N = Abundance (i.e., population estimate), D = Density (tortoises/hectare), Habitat = Available suitable habitat (hectares). Viable Population: N ≥ 250 adult tortoises, D ≥ 0.4 tortoises/hectare, Habitat ≥ 100 hectares; Primary Support Population: N = 50 – 250 adult tortoises, Habitat ≥ 100 hectares; Secondary Support Population: N < 50 adult tortoises (The Gopher Tortoise Council MVP Report II, 2014).

Site	Survey Year	N	D	Habitat
Viable Population				
Apalachee WMA	2017	434	0.50	869
Apalachicola Bluffs and Ravines Preserve	2014	834	0.70	1194
Apalachicola NF – Munson Sandhills East	2015	2638	1.81	1457
Avon Park AFR (surveyed scrub habitat only)	2015	1525	0.61	2577
Bell Ridge WEA	2014	1197	4.10	292
Bullfrog Creek WEA	2016	378	2.04	185
Cayo Costa SP	2015	343	2.10	164
Chassahowitzka WMA	2017	1491	0.70	2598
El Destino Plantation	2015	373	0.61	617
Etoniah Creek SF	2015	1538	1.03	1496
Ft. Clinch SP	2018	426	3.18	134
Ft. White WEA	2014	974	2.97	328
Goethe SF Levy Co. – Main Tract	2014	2039	1.07	1912
Goldhead Branch SP	2014	843	1.12	755
Green Swamp West Unit WMA	2018	2204	0.67	3270
Half Moon WMA	2016	820	0.84	970
Halpata Tastanaki Preserve & Cross FL Greenway – Pruitt Tract	2019	1996	1.09	1797
Highlands Hammock SP	2017	1658	0.88	1209
Ichetucknee Springs SP	2014	1269	3.97	320
Indian Lake SF	2018	622	0.44	1415
Jennings SF	2017	3828	1.34	2863
Jonathan Dickinson SP	2015	870	0.77	1131
Julington-Durbin Preserve	2017	273	1.25	219
Kissimmee Prairie Preserve SP	2017	4778	0.64	7489
Lafayette Forest WEA	2016	388	1.26	308
Lake Louisa SP	2015	1626	2.17	750
Lake Wales Ridge WEA – Lake Placid & McJunkin tracts	2018	456	0.62	737
Lake Wales Ridge WEA – Silver Lake	2015	296	2.07	143
Little Manatee River SP	2018	272	0.59	462
Little River Conservation Area	2018	606	1.27	476
Little Talbot Island SP	2014	754	4.36	173
Moody Branch WEA	2015	478	2.64	182
O'Leno + River Rise SP	2014	1011	2.18	464
Oscar Scherer SP	2019	564	1.41	399
Platt Branch WEA	2017	967	3.20	309
Rainbow Springs SP	2018	479	2.00	239
Ralph E. Simmons SF	2017	1408	3.75	380
St. Marks NWR	2011	640	0.29	2240
St. Sebastian River SP NE	2015	977	0.86	1140
Suwannee Ridge WEA	2016	831	1.81	460
Twin Rivers SF – Blue Springs Tract	2017	2498	2.97	824
Twin Rivers SF – Ellaville Tract	2017	1189	1.14	1040
Wingate Creek SP	2015	303	1.99	152
Withlacoochee SF – Citrus Tract	2015	7179	0.40	17899
Withlacoochee SF – Croom Tract	2016	8221	1.59	5164
Primary Support Population				
Apalachicola National Forest – Munson Sandhills West	2015	1207	0.21	5679
Big Bend WMA – Spring Creek	2016	208	0.71	292
Big Bend WMA – Tide Swamp	2016	238	1.72	138
Blackwater River SF – West Boundary Unit	2016	284	0.10	2827
Crooked Lake WEA	2016	181	1.58	114
Dixie Plantation Conservation Easement	2015	166	0.21	805
Econfina Creek WMA – Carter Tract	2017	96	0.25	384



E.B. Wakulla Spring SP	2015	73	0.16	450
Guana River WMA	2016	219	0.58	381
Hickey Creek WEA	2016	165	1.00	166
Hilochee WMA	2016	176	0.33	527
Horseshoe Plantation Conservation Easement	2015	469	0.34	1384
Joe Budd WMA	2014	66	0.25	258
Lake Wales Ridge WEA – Carter Creek	2015	243	0.31	785
Ocala NF – Riverside Island Sandhill	2015	1126	0.31	3632
Perry Oldenburg WEA	2015	213	1.58	135
Seabranck Preserve SP	2019	228	0.99	231
Torrey SP	2017	216	0.26	822
Triple N Ranch WMA/Bull Creek WMA	2018	1264	0.36	3491
Watermelon Pond WEA	2014	184	1.38	133
Withlacoochee West Conservation Area – Quail Farms Tract	2018	154	0.62	247
Woodfield Springs Plantation Conservation Easement	2015	231	0.27	863
Secondary Support Population				
Branan Field WEA	2017	132	3.54	37
Cherokee Plantation	2015	19	0.07	262
Eglin AFB (surveyed 2648 ha of 121400 ha potential habitat)	2016	36	0.01	2648
Foshalee Plantation Conservation Easement	2015	45	0.06	771
Honeymoon Island SP	2017	217	3.49	62
Merrily Plantation Conservation Easement	2015	34	0.15	232
Tall Timbers Research Station	2015	42	0.18	226
Tate's Hell SF (belt transects)	2017	Unk	Unk	90

