

# RUESCH ENVIRONMENTAL SERVICES, INC.

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## MEMORANDUM

**TO:** Emiliano Antunez  
Mobile (305) 962-5626

**FILE:** Antunez-002  
Tortoises-Daughtery Rd.

**FROM:** Kevin Ruesch

**DATE:** May 4, 2005

**SUBJECT:** Tortoises on Daughtery Road Property

I completed a tortoise survey last week. I estimate the tortoise population is 4.9 tortoises/acre or a total of approximately 82 tortoises (see attached map and results).

There are several options available to deal with the tortoises prior to developing the property. Listed below is a summary of each with my recommendations.

1. Avoid those areas occupied by tortoises. This is an unreasonable option since the tortoises are distributed throughout most of the property. Avoidance means leaving an undisturbed area of 25 feet around every burrow.
2. Relocate tortoises on-site to a preservation area. This is also unreasonable since the tortoise density is so high it would require preserving the entire site.
3. Relocate tortoises off-site to a preservation area. This may be possible but is not recommended. The Florida Fish and Wildlife Conservation Commission (FWC) typically discourage relocation for many reasons (see FWC web site for more information regarding this topic: <http://www.wildflorida.org/permits/default.htm>.) But more importantly, even if we could find a suitable recipient site, the costs may be higher than the next option.
4. Obtain an incidental take permit from the FWC and pay the FWC a mitigation fee for "taking", entombment or killing of the tortoises during development. Although this sounds cruel and inhumane, it is probably the best choice for the species and your proposed development. The money is used to buy, manage, improve, and protect gopher tortoise habitat elsewhere, which will help preserve the species. Based upon the survey results, I estimate the current FWC mitigation fee for an incidental take permit will be approximately \$31,000.

Let me if you have questions and how you want to proceed. Bear in mind that the FWC will not issue a permit until you receive local development approval for your proposed project.