



September 13, 2018

The Honorable Jim Kurth
Acting Director
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

The Honorable Chris Oliver
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East-West Highway
14th Floor
Silver Spring, MD 20910

Re: Endangered and Threatened Wildlife and Plants; Revision of Regulations for Interagency Cooperation; Docket No. 180207140-8140-01-4500090023

Dear Acting Director Kurth and Assistant Administrator Oliver:

On behalf of Charlotte County, Florida I write today in support of modifications to the implementation of the Endangered Species Act that would increase cooperation with local governments and expedite the process for coordination between federal agencies and state and local governments. The County supports preserving the environmental and ecological diversity of our community, while also ensuring that essential infrastructure projects move forward in a timely manner for the benefit of our citizens, our economy, and our environment.

The interagency consultation process and the need to obtain both state and federal approval for many projects can impede the completion of vital projects. Local governments are often forced to go through repetitive processes at the state and federal level to secure permits. Quite often, the state and federal agencies need to review the same information, but each agency requires the information to be reported in different formats. This duplication can result in local governments having to meet two different sets of mitigation requirements as well as adding unnecessary time and complexity to the process. The County strongly supports efforts to better coordinate the requirements between the state and federal governments. The ability to complete one set of documents and studies would reduce costs and provide consistency and predictability.

BOARD OF COUNTY COMMISSIONERS

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Additionally, Charlotte County supports efforts by the National Marine Fisheries Service (NMFS) and the US Fish and Wildlife Service (USFWS) to increase transparency and improve communication with stakeholders when implementing the ESA. Transparency, particularly regarding the timeline for review, will help local project sponsors better plan for our projects. Increased communication about the process will improve understanding and help build trust between levels of governments and with the public. Charlotte County has direct experience trying to navigate the approval process for a wide variety of projects and has encountered continued challenges with communication.

Finally, Charlotte County encourages NMFS and USFWS to continue to look at new opportunities to work with local governments to better address environmental issues. There are several federal resources available for environmental conservation work, but many have overly restrictive requirements. The Cooperative Endangered Species Conservation Fund Section 6 grants administered by the USFWS are designed to support conservation efforts for listed species and applicants are required to have a cooperative agreement with the Department of the Interior, however, these funds cannot be used to support the local efforts to comply with a Habitat Conservation Plan. This means that an applicant would have to find an additional match sources for local funds and complete an entirely separate agreement with Interior in order to move forward with additional conservation efforts. Charlotte County supports reviewing the restrictions on existing resources to ensure they are being used most effectively to address conservation needs and priorities.

Thank you for the opportunity to comment on these important proposals and Charlotte County looks forward to continuing to work with both USFWS and NMFS to best serve our citizens and protect the environment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kenneth W. Doherty". The signature is fluid and cursive, written over a white background.

Kenneth W. Doherty
Charlotte County Board of County Commissioners

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