

BDA
ENVIRONMENTAL CONSULTANTS

March 29, 2017
File: 2016-073-10.3

SENT VIA ELECTRONIC MAIL

jaxregs@fws.gov
U.S. Fish and Wildlife Service
North Florida Field Office
7915 Baymeadows Way, Suite 200
Jacksonville, Florida 32256
Phone: 904-731-3336

RE: Technical Assistance Sand Skink
McGinley Property
Marion County, Florida

Breedlove, Dennis & Associates, Inc. (BDA) recently completed environmental field studies at the McGinley Property (Site) in Marion County, Florida. The Site is approximately 1,272.33 acres located in Sections 9 and 16, Township 17 South, Range 21 East, north and south of county road 484 and west of Interstate 75 in Marion County, Florida (Exhibit 1). On behalf of our client, Mr. Richard McGinley we are herein requesting technical assistance regarding field surveys for sand skinks (*Neoseps [=Plestiodon] reynoldsi*). The Site is located in Marion County, exhibits areas above 82 feet in elevation and includes mapped soil types considered by the U.S. Fish and Wildlife Service (USFWS) to be suitable for sand skinks. However, based upon our Site review, historical land practices, observed conditions and other ecological factors discussed below it is our opinion that the majority of the Site does not provide suitable habitat for sand skinks and does not require field surveys to confirm absence. For the remaining areas that have potential habitat BDA is requesting a reduction in the number of cover boards used in formal surveys for sand skinks. BDA is requesting USFWS concurrence on both these requests.

Sand skinks

The Site today consists of 1,077.27 acres of cropland and pastureland, 40.19 acres of unimproved pasture, 38.96 acres of sand and gravel pits and 0.35 acre of surface water (Exhibit 2). This portion of the Site has been highly disturbed as a result of prior and current land uses (sand mining, crops, pasture for cattle) and as such does not provide potential habitat for sand skinks notwithstanding that the Site is in Marion County and includes areas above 82 feet in elevation with mapped soil types considered by the USFWS to

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BREEDLOVE, DENNIS & ASSOCIATES, INC.

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30 East Liberty St. ~ Brooksville, FL 34601
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Page 2


be suitable for sand skinks. As can be seen in Exhibit 2 currently there are no remaining open sandy patches of soil in these areas. In addition the Site is almost 20 miles from the historic range of sand skinks and located southwest of Ocala and west of I-75 (Exhibit 3).


The remaining 115.56 acres of xeric oak includes some areas within it that are > 82 feet in elevation and exhibit mapped soil types considered by the USFWS to be suitable for sand skinks, however a substantial portion of this area exhibits vegetative cover dominated by tree and shrub species with a dense root mat with some open sandy patches. Pedestrian surveys were conducted and results were negative for sand skinks or their sign. As noted above the Site is almost 20 miles from the historic range of sand skinks and is located southwest of Ocala, Florida and west of I-75. Due to the size of the area to be surveyed, BDA requests that coverboards be placed in areas with the most suitable habitat conditions (bare sand or sparse vegetation adjacent to leaf litter or detritus) at a density of 10 coverboards per acre within the areas shown on Exhibit 4.

On behalf of our client BDA is requesting technical assistance from your office and concurrence with our request. Please contact me with any comments and/or to schedule a Site review. As time is short to complete formal surveys BDA respectfully requests a timely review and response to this request so that surveys can be completed this calendar year.

Thank you very much for your assistance with this request and please let us know if additional information is needed.

Sincerely yours,


Jonathan R. McCurry, M.S., C.W.B.
Associate Scientist III


W. Jeffrey Pardue, C.E.P., M.S., M.B.A.
Senior Vice President

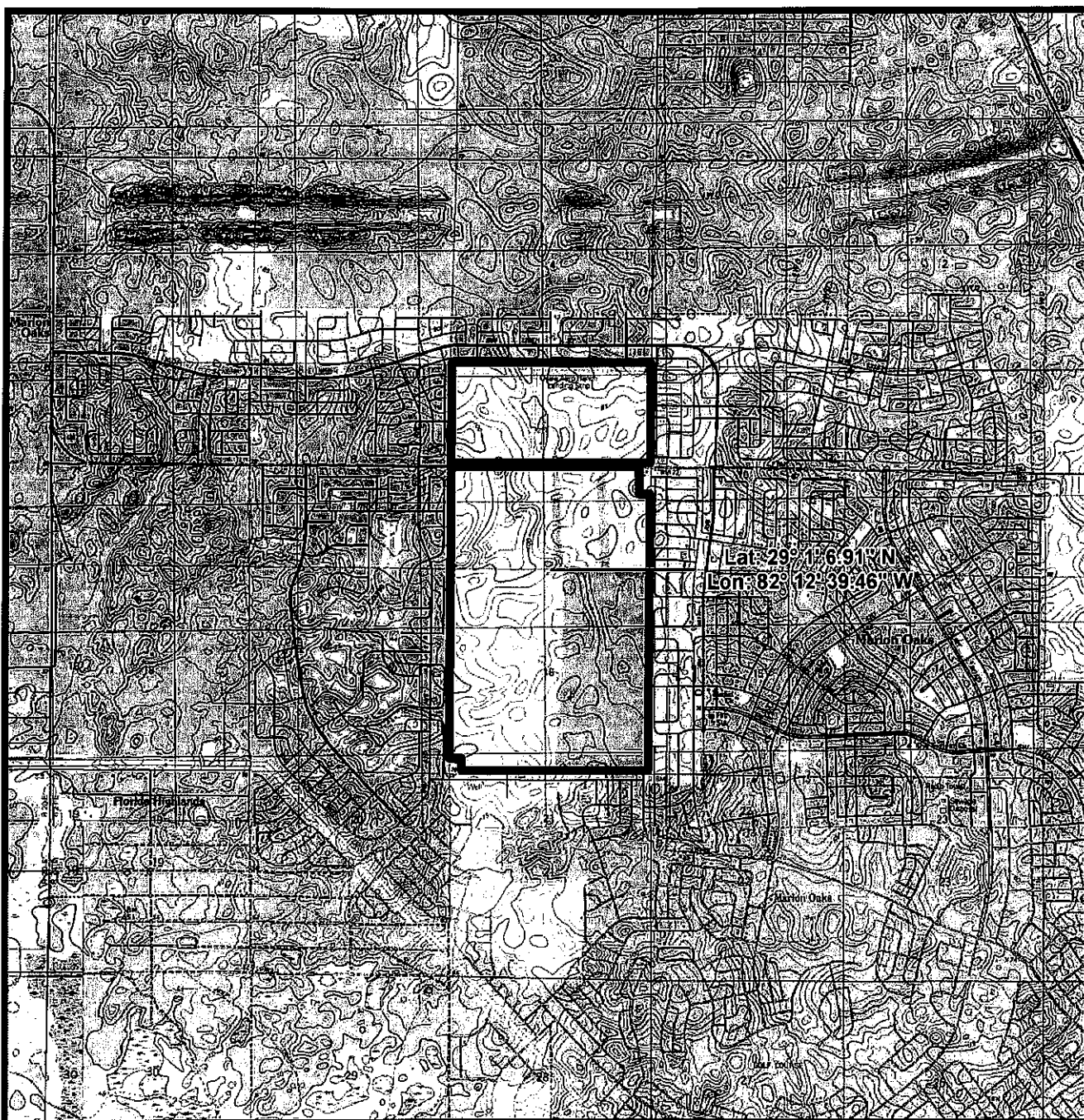
JRM/WJP/tnp

cc: Richard McGinley

Enclosures

EXHIBIT 1

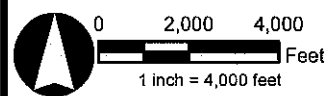
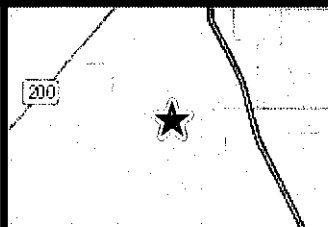
**LOCATION OF THE MCGINLEY PROPERTY
MARION COUNTY, FLORIDA**



Legend

 McGinley Property (1272.33 ac)

Source: Breadlove, Dennis & Associates, Inc. USGS Shady, Fla. Quadrangle streamed from ESRI

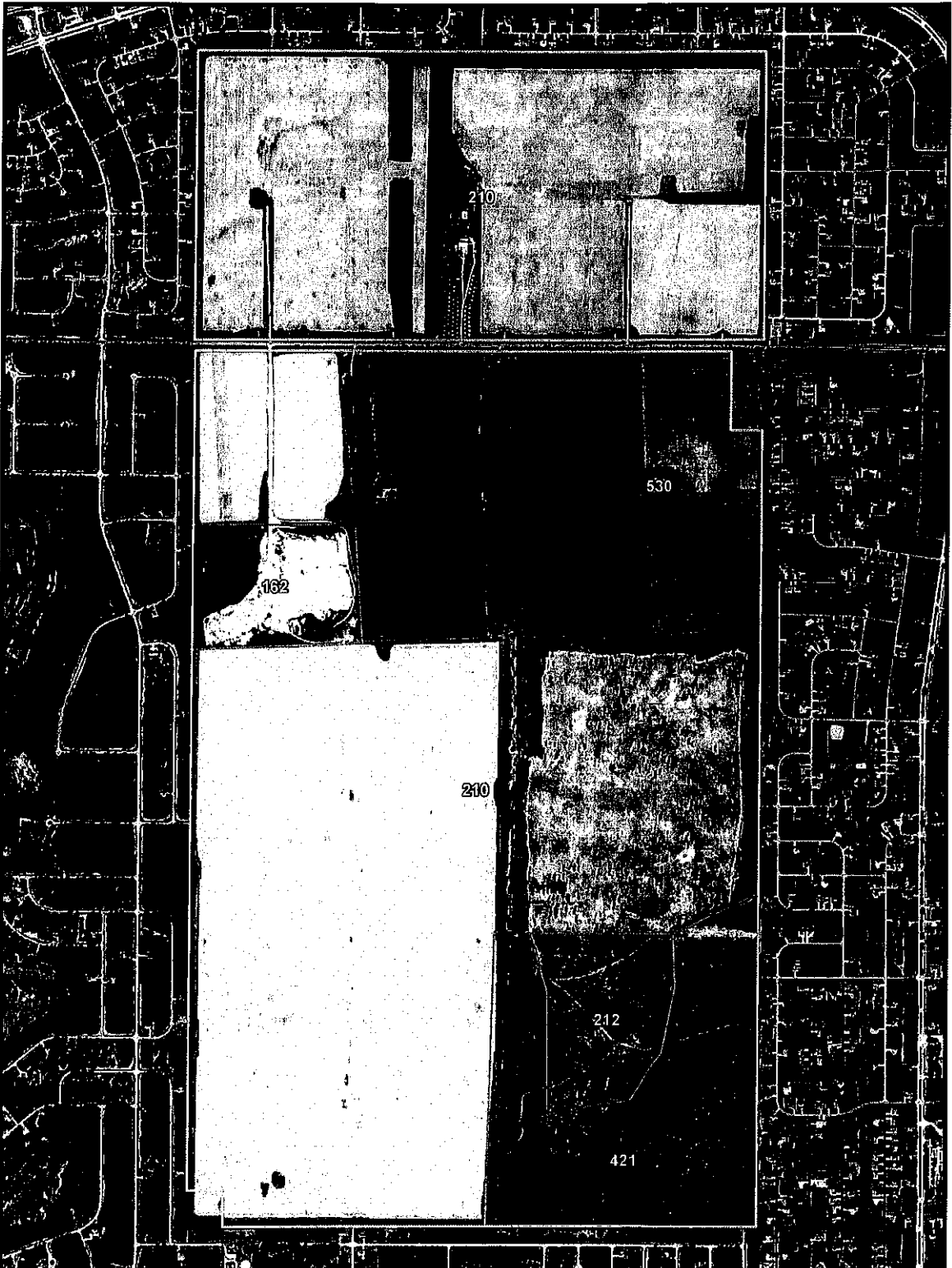


**EXHIBIT 1
LOCATION OF THE MCGINLEY PROPERTY (SECTIONS 9 AND 16,
TOWNSHIP 17 S, RANGE 21 E), MARION COUNTY, FLORIDA.**







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EXHIBIT 2

**FLORIDA LAND USE, COVER AND FORMS CLASSIFICATION SYSTEM
MAP FOR THE MCGINLEY PROPERTY
MARION COUNTY, FLORIDA**



Legend

- | | |
|---|--|
|  McGinley Property (1272.33 ac) |  212 - Unimproved Pastures (40.19 ac) |
| FLUCFCS Data |  421 - Xeric Oak (115.56 ac) |
|  162 - Sand and Gravel Pits (38.96 ac) |  530 - Reservoirs (0.35 ac) |
|  210 - Cropland and Pastureland (1077.27 ac) | |

Source: Breedlove, Dennis & Associates, Inc.

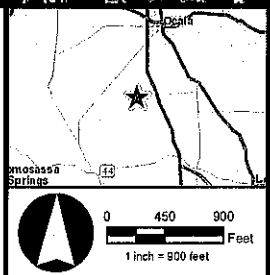
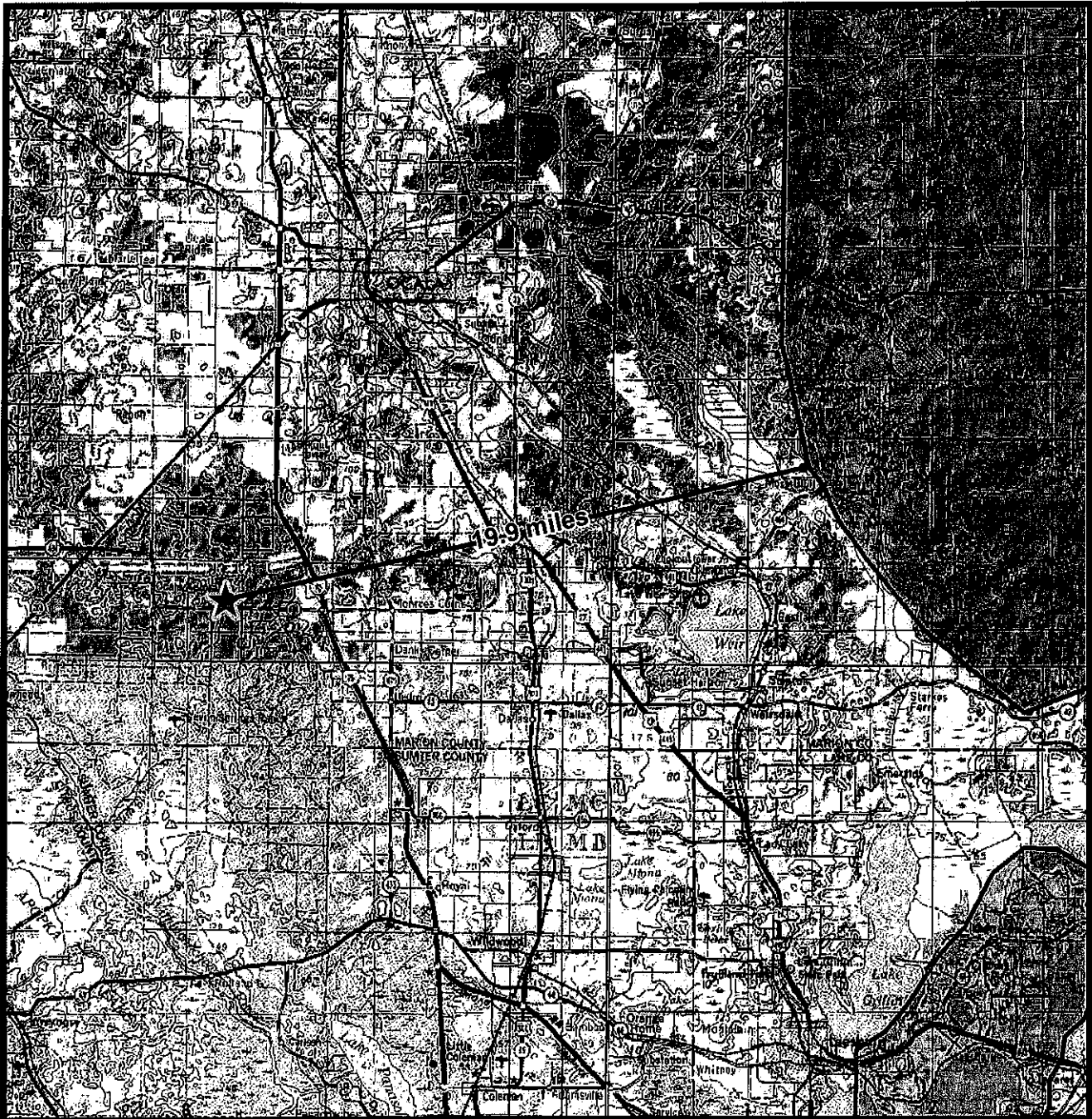


EXHIBIT 2
FLORIDA LAND USE, COVER AND FORMS CLASSIFICATION SYSTEM (FLUCFCS) MAP FOR THE
MCGINLEY PROPERTY, MARION COUNTY FL.

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EXHIBIT 3

**DISTANCE TO HISTORIC SAND SKINK RANGE FROM MCGINLEY SITE
MARION COUNTY, FLORIDA**



Legend

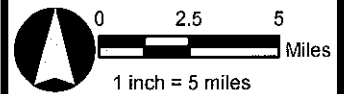
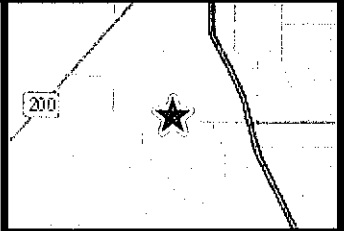


Project Location



Approximate Historic Extent of Sand Skink Habitat

Source: U.S. Fish & Wildlife Service (USFWS)

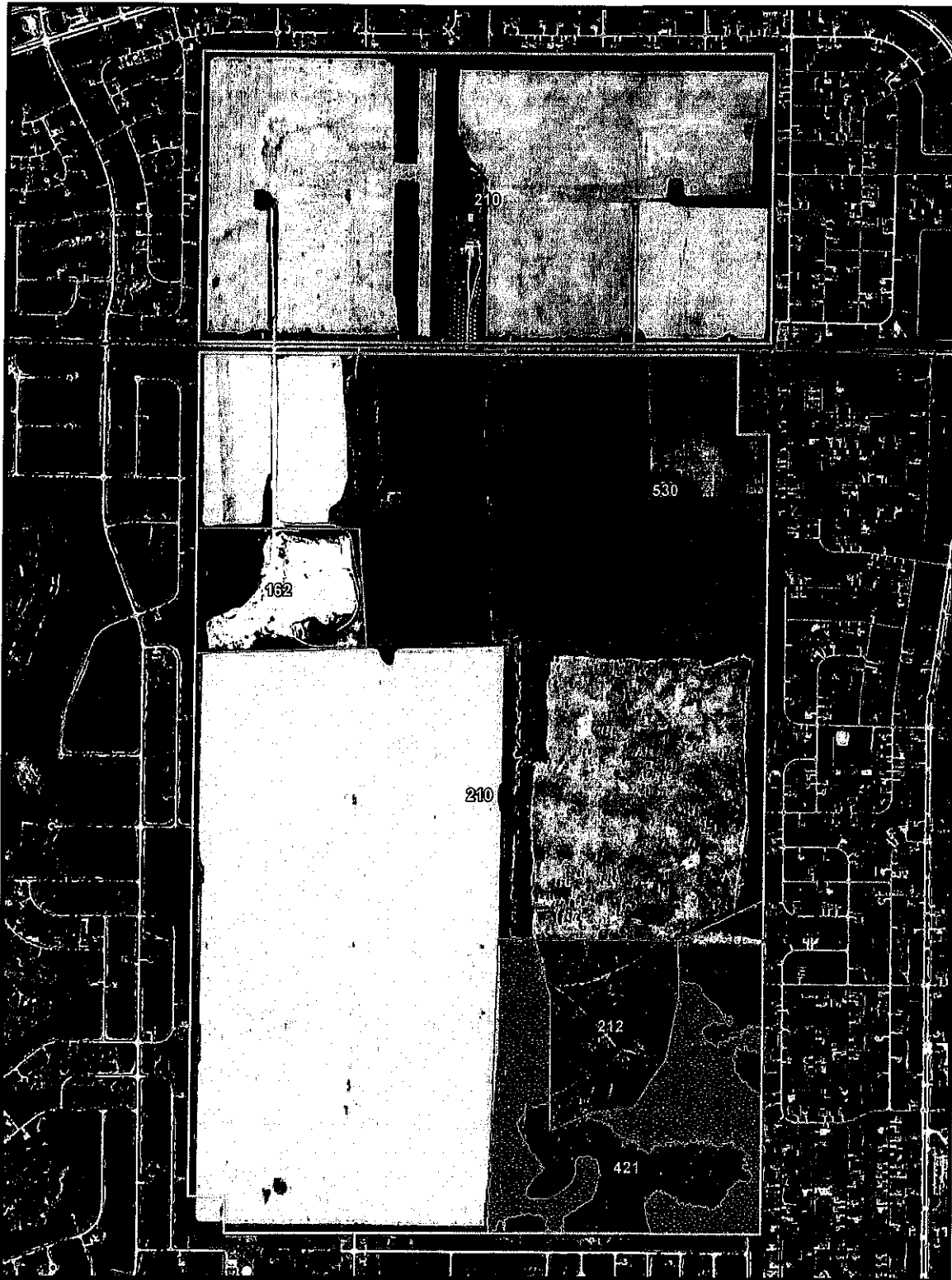


**EXHIBIT 3
DISTANCE TO HISTORIC SAND SKINK RANGE FROM MCGINLEY SITE,
MARION COUNTY, FL**









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EXHIBIT 4

**SAND SKINK COVERBOARD SURVEY AREAS
MCGINLEY PROPERTY, MARION COUNTY, FLORIDA**



Legend

- | | |
|---|---|
|  McGinley Property (1272.33 ac) |  210 - Cropland and Pastureland (1077.27 ac) |
|  Skink Coverboard Survey Areas [Elevation >= 82 feet, Xeric Oak cover type] (66.63 ac) |  212 - Unimproved Pastures (40.19 ac) |
|  FLUCFCS Data |  421 - Xeric Oak (115.56 ac) |
|  162 - Sand and Gravel Pits (38.96 ac) |  530 - Reservoirs (0.35 ac) |

Source: Breedlove, Dennis & Associates, Inc.

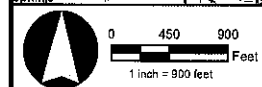
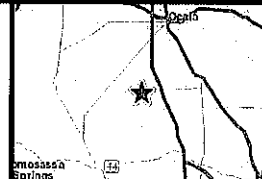


EXHIBIT 4
SAND SKINK COVERBOARD SURVEY AREAS, MCGINLEY PROPERTY, MARION COUNTY,

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