

## 12. VEGETATION & WILDLIFE

- A. Identify the dominant species and other unusual or unique features of the plant communities on Map F. Identify and describe the amount of all plant communities that will be preserved in a natural state following development as shown on Map H.**

The entirety of the subject property consists of agricultural row crops with no natural plant communities present onsite. The dominant vegetative coverage was observed to be various planted row crops with opportunistic species that are not characteristic of typical native habitat. No indications of relative abundance or dominance of a specific habitat type were observed, and therefore no onsite coverages were found to constitute suitable habitat types with appropriate native plant communities. Given the lack of natural vegetative communities, the project site plan does not include any preservation component.

- B. Discuss the survey methods that were used to determine the absence or presence of state or federally listed wildlife and plants. (Sampling methodology should be agreed to by the regional planning council and other reviewing agencies at pre-application conference stage.) State actual sampling times and dates and discuss any factors that may have influenced the results of the sampling effort. Show on Map G the location of all transects, trap grids, or other sampling stations used to determine the on-site status of state or federally listed wildlife and plant resources.**

### Wetland Habitat Assessment

Several field evaluations have been conducted of the subject property, including two joint site inspections with representatives from Miami-Dade County DERM and the SFWMD on February 28, and May 12, 2023, respectively. Field inspections resulted in determinations of no jurisdictional wetlands at the site; therefore, both regulatory agencies confirmed that no remnant wetland areas occur at the site. The presence of listed species and overall potential for wildlife utilization is precluded by the absence of appropriate natural habitat. The additional field evaluations were extensive as observations were documented throughout each of the subject parcels to ensure that the entirety of the site was devoid of wetland areas. No observations of listed species were documented during any of the site inspections, and the potential for foraging habitat was found to be negligible considering existing site conditions. The dominant vegetative coverage was observed to be various planted row crops with opportunistic species that are not characteristic of native habitat. Given the results of the agency inspections, the site does not provide much, if any, potential for wildlife utilization. Nonetheless, further evaluation of potential impacts to listed plant and wildlife species and habitats was conducted in accordance with the habitat assessment methodologies established by pertinent agencies including the United States Fish and Wildlife Service (USFWS) and the Florida Fish and Wildlife Conservation Commission (FWC). The evaluation included review of available literature on listed plant and animal taxa within the site, which incorporated the review of available sources for datasets using Geographic Information Systems (GIS) software to determine the species and habitats that may potentially occur within the limits, or adjacent to, the proposed development.

Site reconnaissance using available GIS data allowed for the initial determination of site-specific taxa and habitats to be considered during the conducted site assessments.

#### Preliminary GIS Data Analysis

The initial analysis included review of GIS datasets prepared by the USFWS for the delineations and coverages of critical habitat and consultation areas, the latter of which establishes the limits for areas of potential concern for a given species that require additional study and assessment of potential impacts. The typical species considered for evaluation of habitat and consultation included the Florida leafwing butterfly (*Anaea troglodyta floridalis*), Florida brickell-bush (*Brickellia mosieri*), Florida bonneted bat (*Eumops floridanus*), Carter's small-flowered flax (*Linum carteri carteri*), Cape Sable seaside sparrow (*Ammospiza maritima mirabilis*), Bartram's hairstreak butterfly (*Strymon acis bartrami*), wood stork (*Mycteria americana*), Everglades snail kite (*Rostrhamus sociabilis*) and the Florida panther (*Puma concolor coryi*). The GIS data for critical habitat areas is available for direct download from the Miami-Dade County Open Data Hub and the most recent version of the dataset was last updated June 2, 2025.

Additional data sources were reviewed for further analysis of relevant spatial information, which include wood stork nesting colonies and core foraging areas, and the spatial extent of the Florida Panther Focus Area, both of which are available for download from the Florida Geographic Data Library Metadata Explorer (FGDL), and were last updated on April 10, 2020, and December 12, 2015, respectively. The additional data review revealed that the subject property does not occur within the limits of the Florida Panther Focus Area; however, the project site is included within the designated wood stork core foraging area and consultation areas for the snail kite and Florida bonneted bat (FBB). It must be noted that the wood stork core foraging area and FBB consultation area both include a significant portion of the greater Miami-Dade County area; therefore, specific site conditions must be considered to better assess the potential for either of these species to occur onsite.

#### Evaluation of Wildlife Utilization

During the field evaluations to determine existence of jurisdictional wetlands within the subject property, observations of the potential presence of both state and federally listed wildlife species and habitats were also noted, which included indirect indicators of wildlife utilization such as tracks, scat, calls or vocalizations, burrows, nests, and roosting sites. Specific attention was given to the documentation of potential nesting and roosting sites within the project area. Given the uniformity of observed site conditions, the agricultural row crops devoid of wetland habitat did not provide much opportunity for occurrences of listed species or other indirect wildlife indicators. In addition to the federally listed species under the jurisdiction of the USFWS, the field studies also considered the potential presence of species managed by the FWC. Considering the lack of wetland resources onsite, particular attention was given to the Gopher tortoise (*Gopherus polyphemus*) and Florida burrowing owl (*Athene cunicularia floridana*), which are known to utilize upland areas. Neither species was observed during any of the field inspections nor the presence of potential burrowing sites for either species. It should be noted that site substrate contains fill material with significant limerock whereas sandy substrate is preferred by

these burrowing species. Therefore, the lack of appropriate substrate deters utilization of the property by the gopher tortoise or burrowing owls.

#### Additional Assessment Methodologies

Considering the results of the field reconnaissance effort to evaluate overall wildlife utilization, more in-depth analysis to assess potential impacts specifically to foraging habitat for wetland-dependent species (i.e., snail kite and wood stork) was not found to be warranted. Potential impacts to wood stork foraging habitat are assessed in accordance with the *Wood Stork Foraging Habitat Assessment Methodology*, a functional assessment developed by USFWS for estimation of available biomass of wood stork forage per unit quantity of wetland habitat. The parameters considered for determination include vegetation density, wetland hydroperiod, prey size suitability, and competition with other wading birds. The differentiation of hydroperiod classes established by the USFWS methodology allows for quantification of biomass forage that may be available to the wood stork per unit area of wetland habitat. However, as aforementioned, the confirmed lack of wetland resources within the subject property indicates that the site does not contain sufficient hydroperiod to allow for any wood stork foraging habitat. Therefore, further analysis of hydroperiod via groundwater and elevation data would not be warranted given the upland conditions characteristic of the site.

Analysis of potential impacts to snail kite habitat are assessed in accordance with the *Snail Kite Survey Protocol*. The adequacy of snail kite habitat is determined by the presence of appropriate foraging habitat as evidenced by coverage of hydrophilic vegetation (*Panicum* spp., *Eleocharis* spp., *Rhynchospora* spp.), nesting or perching substrate (*Salix caroliniana*, *Melaleuca quinquenervia*, *Cladium jamaicense*), appropriate water depth (0.2-1.3m) under nesting substrate, and adequate distance (>150m) between nesting substrate and upland areas. No such hydrophilic vegetation occurs within the subject property. Like the above detailed hydroperiod component of the wood stork assessment, the analysis of adequate water depth allows for the determination of potential foraging habitat for the snail kite. However, given that the subject property is devoid of wetland conditions, the potential for snail kite habitat is nonexistent. The presence of upland conditions throughout the site precludes establishment of appropriate hydrology to sustain foraging habitat for the snail kite.

- C. List all state or federally listed wildlife and plant resources that were observed on the site and show location on Map G. Given the plant communities on-site, list any additional state or federally listed wildlife and plant resources expected to occur on the site and show the location of suitable habitat on Map G. Additionally, address any unique wildlife and plant resources, such as colonial bird nesting sites and migrating bird concentration areas. For species that are either observed or expected to utilize the site, discuss the known or expected location and population size on-site, existence (and extent, if known) of adjacent, contiguous habitat off-site, and any special habitat requirements of the species.**

No state or federally listed plant and wildlife resources were documented within the subject property nor any natural habitat areas that would encourage wildlife utilization. Given the upland and agricultural character of the site, the presence of

native wetland plant or wildlife species is precluded by existing site conditions. As part of several agency field inspections in support of the wetland determinations, site conditions were assessed within each of the individual parcels that comprise the subject property. The overall layout of the traversed path is shown on Map G.

**D. Indicate what impact development of the site will pose to affected state or federally listed wildlife and plant resources.**

The proposed development is not anticipated to pose any significant impact to state or federally listed wildlife or plant species. Nonetheless, despite the lack of appropriate habitat within the property, consultation with the USFWS has been conducted to confirm the preliminary determinations. The USFWS has assigned the City Park project with Project Code 2024-0064109 and the applicant has recently obtained concurrence for the effect determinations of each pertinent species, as further summarized in the table below. The USFWS has provided programmatic concurrence via Technical Assistance (TA) letter (copy enclosed) to verify the site findings and potential for impact to listed species.

Listed Species	Determination	Rationale
Florida Panther ( <i>Puma concolor coryi</i> )	No Effect	Not within Panther Focus Area
Wood Stork ( <i>Mycteria americana</i> )	No Effect	No wetlands or suitable foraging habitat
Florida Bonneted Bat ( <i>Eumops floridanus</i> )	MANLAA-P	No suitable roosting habitat, implementation of BMPs
Everglade Snail Kite ( <i>Rostrhamus sociabilis</i> )	No Effect	No wetlands or suitable foraging habitat
Eastern Indigo Snake ( <i>Drymarchon couperi</i> )	May Affect	Implementation of Standard Protection Measures

**E. Discuss what measures are proposed to be taken to mitigate impacts to state and federally listed wildlife and plant resources. If protection is proposed to occur on-site, describe what legal instrument will be used to protect the site, and what management actions will be taken to maintain habitat value. If protection is proposed to occur off-site, identify the proposed amount and type of lands to be mitigated as well as whether mitigation would be through a regional mitigation land bank, by acquisition of lands that adjoin existing public holdings, or by other means.**

As further detailed in the USFWS TA letter, Best Management Practices (BMPs) will be incorporated into the project design to minimize impacts to the FBB, which include the planting of at least 40% native tree species as part of the landscaping plan, establishing buffers around lake edges, the utilization of wildlife-friendly lighting and an Integrated Pest Management approach. The Standard Protection Measures for the Eastern Indigo Snake will also be adhered to throughout the construction phase of the project.

**F. Responses to Review Agency Requirements Detailed in the Agreement to Delete Questions, Appendix A**

- 1. Applicant shall coordinate and consult with the Florida Fish and Wildlife Conservation Commission (FWC) regarding methodology and related assumptions and data sources to assess which, if any, listed species will be utilized for analysis. In addition, environmental studies regarding the presence of endangered species shall be required. Furthermore, the**

**Applicant shall coordinate and consult with the Miami-Dade County Division of Environmental Resource Management (DERM) regarding methodology and related assumptions and data sources to assess which CDMP-listed species shall be utilized for analysis. In addition, environmental studies regarding the presence of CDMP-listed endangered species shall be required.**

As part of the formal consultation for the listed species determinations, the USFWS has incorporated additional FWC coordination into the resulting TA letter. Several environmental studies have been conducted to date, and the results have been documented in support of the USFWS formal consultation. The data sources used in the analysis are recognized by DERM as part of the methodology for assessing potential impacts to listed species and habitat.

- 2. The GIS data for critical habitat areas is available for direct download from the Miami-Dade County Open Data Hub and the most recent version of the dataset was last updated August 28, 2019. Examples of additional data sources that shall be reviewed for further analysis of relevant spatial information include wood stork nesting colonies and core foraging areas and the spatial extent of the Florida Panther Focus Area, both of which are available for download from the Florida Geographic Data Library Metadata Explorer (FGDL), and were last updated on April 10, 2020, and December 12, 2015, respectively.**

As detailed in the Preliminary GIS Data Analysis section of the above Item B, several datasets were utilized in support of the potential impact determination for pertinent listed species. The data is made available by the USFWS and is intended to provide guidance during the formal consultation process, which has recently been completed for the City Park project.

- 3. The proposed additional field evaluation of the study area shall be conducted to specifically evaluate the potential presence of both state and federally listed wildlife species and their habitats within the site. Wildlife observations shall include indirect indicators of wildlife utilization such as tracks, scat, calls or vocalizations, burrows, nests, and roosting sites. Specific attention shall be given to all nesting and roosting sites documented during the study period. All the locations of documented field occurrences of listed species, or their nests, burrows or roosts, and other indirect wildlife indicators shall be GPS recorded and documented on scaled aerial photographs and maps of the site. No trapping shall be proposed to be included as part of the field evaluation as site review and field observation are deemed suitable for the habitat areas and potentially include wildlife taxa anticipated to occur within the proposed project limits.**

As stated in the response to Item C above, no listed species nor habitat areas were documented during any of the field evaluations. No indirect indicators of wildlife utilization were observed; therefore, no locations of documented field occurrences are included on Map G.

4. In addition to the field reconnaissance effort to evaluate overall wildlife utilization, more in-depth analyses will also be conducted to assess the potential impacts specifically to foraging habitat for the snail kite, wood stork, and the Florida bonneted bat (FBB). Potential impacts to wood stork foraging habitat shall be assessed in accordance with the Wood Stork Foraging Habitat Assessment Methodology, a functional assessment developed by USFWS for estimation of available biomass of wood stork forage per unit quantity of wetland habitat. The parameters considered for determination include vegetation density, wetland hydroperiod, prey size suitability, and competition with other wading birds. The differentiation of hydroperiod classes established by the USFWS methodology shall also be assessed via analysis of available hydrology and LiDAR data. Data sources include the DBHYDRO Data Portal (SFWMD), and the GIS LiDAR elevation dataset obtained from the Miami-Dade County Open Data Hub.

As outlined in Item D above, preliminary effect determinations for pertinent listed species were provided to the USFWS for review and comment. Given the results of the jurisdictional determinations conducted by DERM and the SFWMD, the lack of wetland conditions onsite precludes site utilization for the wetland-dependent species (wood stork and snail kite). The USFWS provided programmatic concurrence with the effect determinations via TA letter as part of the formal consultation, which required BMPs for the FBB. As detailed in the Additional Assessment Methodologies section of Item B above, analysis of hydroperiod is not warranted given the confirmed lack of wetlands onsite.

5. Potential impacts to snail kite habitat shall be assessed in accordance with the Snail Kite Survey Protocol. In accordance with the survey protocol, the adequacy of snail kite habitat shall be determined by the presence of appropriate foraging habitat as evidenced by coverage of hydrophilic vegetation (*Panicum* spp., *Eleocharis* spp., *Rhynchospora* spp.), nesting or perching substrate (*Salix caroliniana*, *Melaleuca quinquenervia*, *Cladium jamaicense*), appropriate water depth (0.2-1.3m) under nesting substrate, and adequate distance (>150m) between nesting substrate and upland areas. The analysis of water depth adequacy to utilize a similar methodology as the hydroperiod class assessment detailed above (i.e., DBHYDRO and LiDAR data).

As outlined in Item D above, preliminary effect determinations for pertinent listed species were provided to the USFWS for review and comment. Given the results of the jurisdictional determinations conducted by DERM and the SFWMD, the lack of wetland conditions onsite precludes site utilization for the wetland-dependent species, including the snail kite. USFWS has provided programmatic concurrence via TA letter as part of the formal consultation. As further detailed in the Additional Assessment Methodologies section of Item B above, analysis of appropriate foraging habitat is not warranted given the confirmed lack of wetlands onsite.

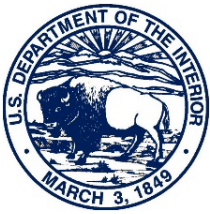
6. The potential for impacts to roosting and foraging habitat for the FBB shall also be assessed during the field inspection. Being that portions of the onsite agricultural lands are comprised of tree farming activity,

**any trees documented to be of sufficient size and diameter shall be recorded and depicted on site maps as having the potential to provide roosting opportunities. An acoustic survey shall be conducted in accordance with USFWS guidelines for the adequate number of acoustic recordings in terms of calendar nights and locations throughout the site. The subsequent analysis of recorded calls shall allow for accurate determination of roosting or feeding activity within the site or the immediate vicinity to assess the presence or overall utilization of the site by FBB.**

As stated in Item D above, the preliminary effect determination for the FBB was provided to the USFWS for review and comment. The site consists of row crops with no tree farms or structures; therefore, the potential for roosting habitat is not present onsite. However, given the recent changes to the FBB consultation protocol, the USFWS has established much of the greater Miami-Dade County area as the Assumed Presence Polygon for the FBB. The formal consultation was initiated based on this assumed presence of the FBB and implementation of BMPs. The USFWS has provided programmatic concurrence of the FBB determination via TA letter to conclude the formal consultation process. The documentation of tree resources is not applicable to site conditions, and the acoustic survey is not required given consultation with the assumed presence status.

**Project Code 2024-0064109**  
**USFWS Technical Assistance Letter**





# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Florida Ecological Services Field Office



September 30, 2025

Edward A. Swakon, P.E.  
EAS Engineering, Inc.  
55 Almeria Ave  
Coral Gables, FL 33134

Service Consultation Code: 2024-0064109  
Date Received: March 8, 2024  
Project: City Park  
Applicant: The Krome Groves Land  
Trust  
County: Miami-Dade

Dear Mr Swakon:

The U.S. Fish and Wildlife Service (Service) has received the March 8, 2024, request for technical assistance from EAS Engineering, Inc. (Consultant) regarding The Krome Groves Land Trust (Applicant) City Park project (Project). In your letter, you requested technical assistance regarding the potential impacts of the proposed project to the federally endangered Florida bonneted bat (*Eumops floridanus*; FBB). This letter transmits the Service's response under section 7 of the Endangered Species Act of 1973, as amended (87 Stat. 884; 16 U.S.C. 1531 et seq.).

The applicant plans to develop a mixed-use project on a 950-acre property that consists of ten individual parcels located east of SW 177th (Krome) Ave, between SW 136th St and SW 152nd St, in Sections 19 and 20, Township 55S, Range 39E, within unincorporated Miami-Dade County, Florida. Currently, the site is composed of agricultural row crops.

The project site is located within the consultation area for the FBB and contains potentially suitable foraging habitat; however, no roosting habitat has been identified on-site. Given the ecological significance of the site for the species, the applicant proposes to implement the following avoidance and minimization measures:

- Establish a minimum 10-foot (3.0-meter) vegetated buffer around lake edges, enhanced with native herbaceous wetland vegetation. Plant selection should be coordinated with Miami-Dade County to ensure compatibility with FBB-friendly species.
- The final landscaping plan will include at least 40% native plant species. The applicant will submit the finalized plan to the Service within 30 days of this letter's issuance.
- Ensure that natural light conditions are maintained. Artificial lighting will be minimized, and permanent nighttime lighting will be avoided. Where lighting is necessary to meet minimum life-safety requirements, it will comply with wildlife-friendly lighting guidelines recommended by the Service and the Florida Fish and Wildlife Conservation Commission.

Lighting plans and a letter detailing measures taken to ensure compliance must be submitted as documentation of implementation.

- The applicant submitted a letter specifying that engineering designs will avoid features that encourage bats to use roofs, buildings, or other structures.
- The applicant will implement an Integrated Pest Management (IPM) approach to minimize the use of pesticides, insecticides, and herbicides. Applications will follow label instructions and avoid widespread use. A 25 feet (7.6 meter) buffer will be maintained around sensitive areas where FBB may drink or forage, and no chemicals will be applied within these zones.

Please note that Service review of this project does not imply compliance with other Federal, State, county, or municipal regulations, which remain the applicant's responsibility. The Service believes that implementing the avoidance and minimization measures described above will reduce adverse effects to the Florida bonneted bat.

This action does not exempt incidental take of listed wildlife species. If the project is modified, or if new information indicates potential effects to listed species or critical habitat, please contact the Service to determine whether additional coordination is warranted. The applicant is responsible for staying informed of any changes in the listing status of species or designation of critical habitat that may be affected by the project.

Thank you for your cooperation in helping to protect fish and wildlife resources. If you have any questions regarding this project, please contact the Service by email at [fw4flesregs@fws.gov](mailto:fw4flesregs@fws.gov). When emailing, please include the project name (City Park) and the Service Consultation Code (2024-0064109) in your request.

Sincerely,

Emarie Ayala  
Fish and Wildlife Biologist  
Florida Ecological Services Office

cc: electronic only  
Alec Basseda, Project Manager, EAS Engineering, Inc.