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October 2, 2013

Attn: FWS-R4-ES-2013-0031
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Dr.; MS-2042-PDM
Arlington, VA 22203

Dear U.S. Fish and Wildlife Service:

As a peer reviewer for the proposed listing and designation of critical habitat for the Florida leafwing (*Anaea troglodyta floridaalis*) and Bartram's scrub-hairstreak (*Strymon acis bartrami*), I have thoroughly reviewed the materials that were sent to me on August 15, 2013. I have the following comments relative to the proposed listing and designation of critical habitat:

- 1) I found the scientific analyses and reviews considered in the decisionmaking process to be complete and based on the best data available, and I support your agency's decision to list both species as endangered under the existing federal guidelines.
- 2) Based upon my knowledge of the south Florida road network, I believe there are some discrepancies between the written description of the boundaries of the critical habitats and the maps that were included as part of the Federal Register on August 15, 2013. Please review my suggested corrections below and see if they actually represent the intended boundaries for the critical habitats:

p. 49841, middle column

Unit FLB2: should be corrected to read "on the west by the vicinity of SW 202 Avenue" (from "SW 2002 Avenue").

Unit FLB3: should be corrected to read "This unit is bordered on the north by Coral Reef Drive (from "Road") and on the south by SW 168 Street; on the east by SW 117 Avenue and on the west by SW 137 Avenue (from "US 1") then resumes bordered on the north by SW 168 Street



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(from "Coral Reef Road") and on the south by SW 184 Street; on the east by SW 122 Avenue (from "US 1") and on the west by SW 137 Avenue.

P. 49847, middle column

Unit BSHB3: should be corrected to read "This unit begins...then resumes along SW 248 Street, south to SW 256 Street, between SW 144 Avenue (from "244 Avenue") and the vicinity....then resumes between (delete word "of") SW 264 Street and SW 272 Street...then resumes along both sides of SW 264 Street in the vicinity of SW 162 Avenue (from "262 Avenue").

P. 49847, rightmost column

Unit BSHB4: should be corrected to read "This unit.....then resumes on Coral Reef Drive (from "Road")...then resumes from Coral Reef Drive (from "Road") south to SW 184 Street, between FL-832 (Florida's Turnpike) (from "US-1") and SW 137 Avenue."

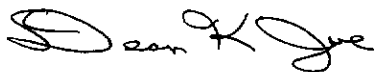
- 3) The designation of critical habitat for Bartram's scrub-hairstreak was stated to be "all pine rocklands fragments, at least 7 ha (18 ac.) in size, that are currently unoccupied and within 5 km (3 miles) of an extant Bartram's scrub-hairstreak population within Miami-Dade County."

Based on these criteria, there are three additional pine rockland fragments that should be considered for addition to the list of designated critical Bartram's scrub-hairstreak habitats. Using the Florida Natural Areas Inventory's database of Florida's conservation lands, accessible at www.fnai.org, the Rockdale Pineland/Addition definitely meets the criteria (over 30 acres in size and about 2.7 miles from the U.S. Coast Guard Station) and the Goulds Pineland Preserve just meets them (over 35 acres in size and barely under 3.0 miles from the Miami Metrozoo. The Porter Pineland Preserve of seven acres, while not meeting the size criterion, is closer to the Miami Metrozoo and could serve as a stepping stone for the scrub-hairstreak in colonizing the larger Goulds Pineland Preserve. A search of the Institute for Regional Conservation database on these three parcels shows all have the pineland croton already documented on site.

Unless there are extenuating circumstances for not including the Rockdale Pineland/Addition, the Porter Pineland Preserve, and the Goulds Pineland Preserve, I recommend that they be added to the list of sites designated as critical habitat for the Bartram's scrub-hairstreak.

Thank you for the opportunity for me to review your proposed listings. I look forward to receiving your final determination and recommendations report.

Sincerely,



Dean K. Jue