

**APPENDIX A
AGENCY CORRESPONDENCE**



DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, MCAAP
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

August 4, 2006

U-134-06

Ms. Kathy Boydston
Wildlife Habitat Assessment Program
Texas Parks & Wildlife
4200 Smith School Road
Austin, TX 78744

Subject: Review of Draft Integrated Natural Resource Management Plan (INRMP) and Environmental Assessment (EA) for the INRMP implementation, Camp Stanley Storage Activity (CSSA), Boerne, Texas

Dear Ms. Boydston:

The Camp Stanley Storage Activity (CSSA), McAlester Army Ammunition Plant, U.S. Army Field Support Command, Army Materiel Command, U.S. Army, has prepared a draft Integrated Natural Resource Management Plan (INRMP) and Environmental Assessment (EA) for the INRMP implementation (included as Appendix H of the Draft INRMP). The Draft CSSA INRMP has been prepared in compliance with the Sikes Act (16 U.S.C. 670a-670f, as amended) and Army Regulation 200-2.

The Draft CSSA INRMP ensures that natural resource management activities are integrated, consistent, and compliant with federal stewardship activities, and serves as the Installation Manager's comprehensive plan for natural resource management to attain and sustain stewardship requirements while enhancing the CSSA military mission.

Please provide comments or suggestions regarding the INRMP no later than 30 days from receipt. Additional documents for review have been forwarded to Allison Arnold and Steve C. Helfert with the U.S. Fish and Wildlife Service (USFWS). Your assistance in providing information is greatly appreciated. If you have any questions please feel free to contact Glaré Sanchez, Environmental Program Manager, at (210) 698-5208.

Sincerely,


Jason D. Shirley
Installation Manager

Attachment

cc: Ms. Glare Sanchez
CSSA Environmental Program Manager
25800 Ralph Fair Road
Boerne, TX 78015-4800

Ms. Julie Burdey
Parsons
8000 Centre Park Dr., Ste. 200
Austin, TX 78754

Mr. Justin Kirk
Parsons
8000 Centre Park Dr., Ste. 200
Austin, TX 78754



DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, MCAAP
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

August 4, 2006

U-133-06

Mr. Steve C. Helfert
United States Fish and Wildlife Service
Southwest Region 2 Office
P.O. Box 1306
Albuquerque, New Mexico

Subject: Review of Draft Integrated Natural Resource Management Plan (INRMP) and Environmental Assessment (EA) for the INRMP implementation, Camp Stanley Storage Activity (CSSA), Boerne, Texas

Dear Mr. Helfert:

The Camp Stanley Storage Activity (CSSA), McAlester Army Ammunition Plant, U.S. Army Field Support Command, Army Materiel Command, U.S. Army, has prepared a draft Integrated Natural Resource Management Plan (INRMP) and Environmental Assessment (EA) for the INRMP implementation (included as Appendix H of the Draft INRMP). The Draft CSSA INRMP has been prepared in compliance with the Sikes Act (16 U.S.C. 670a-670f, as amended) and Army Regulation 200-2.

The Draft CSSA INRMP ensures that natural resource management activities are integrated, consistent, and compliant with federal stewardship activities, and serves as the Installation Manager's comprehensive plan for natural resource management to attain and sustain stewardship requirements while enhancing the CSSA military mission.

Please provide comments or suggestions regarding the INRMP no later than 30 days from receipt. Additional documents for review have been forwarded to Allison Arnold, U.S. Fish and Wildlife Service (USFWS), and Kathy Boydston, Texas Parks and Wildlife (TPW). Your assistance in providing information is greatly appreciated. If you have any questions please feel free to contact Glaré Sanchez, Environmental Program Manager, at (210) 698-5208.

Sincerely,


Jason D. Shirley
Installation Manager

Attachment

cc: Ms. Glare Sanchez
CSSA Environmental Program Manager
25800 Ralph Fair Road
Boerne, TX 78015-4800

Ms. Julie Burdey
Parsons
8000 Centre Park Dr., Ste. 200
Austin, TX 78754

Mr. Justin Kirk
Parsons
8000 Centre Park Dr., Ste. 200
Austin, TX 78754



DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, MCAAP
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

August 4, 2006

U-132-06

Ms. Allison Arnold
U.S. Fish & Wildlife Service
Austin Ecological Services Field Office
10711 Burnet Road, Suite 200
Austin, Texas 78758-4460

Subject: Review of Draft Integrated Natural Resource Management
Plan (INRMP) and Environmental Assessment (EA) for the
INRMP implementation, Camp Stanley Storage Activity
(CSSA), Boerne, Texas

Dear Ms. Arnold:

The Camp Stanley Storage Activity (CSSA), McAlester Army Ammunition Plant, U.S. Army Field Support Command, Army Materiel Command, U.S. Army, has prepared a draft Integrated Natural Resource Management Plan (INRMP) and Environmental Assessment (EA) for the INRMP implementation (included as Appendix H of the Draft INRMP). The Draft CSSA INRMP has been prepared in compliance with the Sikes Act (16 U.S.C. 670a-670f, as amended) and Army Regulation 200-2.

The Draft CSSA INRMP ensures that natural resource management activities are integrated, consistent, and compliant with federal stewardship activities, and serves as the Installation Manager's comprehensive plan for natural resource management to attain and sustain stewardship requirements while enhancing the CSSA military mission.

Please provide comments or suggestions regarding the INRMP no later than 30 days from receipt. Additional documents for review have been forwarded to Steve C. Helfert, U.S. Fish and Wildlife Service (USFWS), and Kathy Boydston, Texas Parks and Wildlife (TPW). Your assistance in providing information is greatly appreciated. If you have any questions please feel free to contact Glaré Sanchez, Environmental Program Manager, at (210) 698-5208.

Sincerely,


Jason D. Shirley
Installation Manager

Attachment

cc: Ms. Glare Sanchez
CSSA Environmental Program Manager
25800 Ralph Fair Road
Boerne, TX 78015-4800

Ms. Julie Burdey
Parsons
8000 Centre Park Dr., Ste. 200
Austin, TX 78754

Mr. Justin Kirk
Parsons
8000 Centre Park Dr., Ste. 200
Austin, TX 78754

Houston, Taylor

From: Allison_Arnold@fws.gov
Sent: Monday, October 02, 2006 9:08 AM
To: Houston, Taylor
Subject: Camp Stanley INRMP

Hi Taylor,

Please see my responses below in blue.

Just call if you would like to discuss.

Have a good one.

Thanks

Allison Arnold
U.S. Fish & Wildlife Service
Austin Ecological Services Field Office
10711 Burnet Road, Suite 200
Austin, Texas 78758-4460
Phone: (512) 490-0057 x 242
Fax: (512) 490-0974

Hello Allison,

I hope all is well on your end. I wanted to confirm/discuss with you the CSSA INRMP revisions before we send you the "draft final."

Revised language for ESA (Subsection 2.8.4) -

Replace:

"The Endangered Species Act (ESA) of 1973 and AR 200-3 require the Army to protect animal and plant species that are federally listed as endangered or threatened. The ESA specifically requires agencies not to "take" or "jeopardize" the continued existence of any listed species, or to destroy or adversely modify habitat critical to any listed species. In addition, Texas Parks and Wildlife (TPWD) maintains a list of state endangered and threatened species.

With:

"The Endangered Species Act (ESA) of 1973 provides broad protection for species of fish, wildlife and plants that are listed as threatened or endangered in the U.S. or elsewhere. Provisions are made for listing species, as well as for recovery plans and the designation of critical habitat for listed species. The ESA outlines procedures for federal agencies to follow when taking actions that may ~~jeopardize~~ **affect** listed species, and contains exceptions and exemptions **for take**. **Section 7 of the ESA requires that all federal agencies consult with the Service to ensure that the actions authorized, funded, or carried out by such agencies do**

8/27/2007

not
jeopardize the continued existence of any threatened or endangered species or adversely modify or
destroy
critical habitat of such species. AR 200-3 further implements ESA protections on Army
lands.

In addition, Texas Parks and Wildlife (TPWD) maintains a list of state endangered
and
threatened species."

Consideration of steam/hot water treatment probe for RIFA treatment
This would integrate nicely into Section 5.2.3 - Nuisance Wildlife
Management and Project 5G - RIFA Control. Mound density in karst buffer
zones may justify (1) purchase of a unit or (2) contracting with private
providers.

Modifying burn unit map (Figure 4.1) -
Carl Schwope (USFWS BCNWR Fire Management Officer) has suggested grouping
some of the proposed burn units into larger and fewer units as a cost
saving measure. He has also indicated that a 3-year rotation and summer
burns for a few of the units would be appropriate. I believe this
increased specificity would make a better document, but summer burns would
need to be considered in the BO.

Inclusion of "shaded fuel breaks" along perimeter of CSSA in GCWA habitat
areas.

Carl Schwope has suggested the use of shaded fuel breaks in areas along
the perimeter that coincide with GCWA habitat. This was included as part
of the intra-service consultation for the refuge, I believe. There is
approximately 4 miles of fenceline that may be eligible for this type of
fuel break. Fuel breaks are somewhat a high priority for CSSA, and would
meet military mission goals (protection & security), having them shaded I
believe would lessen the impact significantly in habitat areas.

Inclusion of a Subsection entitled "Military Mission Impacts on the Local
Environment"

This subsection would be included in Section 2- Installation Mission and
Environmental Setting, and could summarize the various Environmental
Assessments at CSSA to date. I like this subsection for 2 reasons: (1) as
CSSA environmental documents are produced, the summaries can be included
in periodic updates to the INRMP, and (2) this would [possibly] satisfy
the requirements for a Programmatic BO, if CSSA chooses to go that route.
It may serve to aid the programmatic BO if CSSA decides to go for that at
a later date. This section should include a summary of foreseeable actions
in the future, which may assist with the formulation of the ITS on your
end. You had indicated in an earlier email that the INRMP does not
address day-to-day operations at CSSA, only the natural resource
management side. My question to you is would a subsection as described
like this be sufficient? **Yes, it would help for sure. Be sure that this
subsection
is specific enough to determine what take, if any, may occur as a result of the
action. This way, we can add up all of the anticipated take and provide a
programmatic form of take for an extended period of time for all of those actions,
so long
as the sum of take does not cause jeopardy.**

If there are additional comments you have on the INRMP or thoughts on the

8/27/2007

other additions, please let me know. As you indicated in your email, we should submit to you the draft final with the request of concurrence that the CSSA INRMP "may affect, but not adversely affect" listed species. If you think these additions/modifications will do the trick, I will revise and submit with the request for concurrence letter. Make sure that CSSA does not anticipate take in the future. If take is insignificant or discountable or wholly beneficial, then NLAA would likely apply. But, if any take would or even could occur, then I would recommend a concurrence with your estimation of anticipated take and a request for take coverage per a BO. Thanks for your time and support in helping CSSA with ESA.

For the road improvements project (perimeter road), I think we agreed that, as proposed with avoidance measures, this project would probably fall under a NLAA call. I don't know that the INRMP would just yet, I just need to see the final document.

Hope you have a good weekend,

Taylor

Taylor Houston
Parsons
8000 Centre Park Drive #200
Austin, Texas 78754
(p) 512-719-6041 (f) 512-719-6099
CELL: 512-299-0609

8/27/2007



November 8, 2006

Mr. Jason D. Shirley
Installation Manager, CSSA
25800 Ralph Fair Road
Boerne, TX 78015-48000

RE: Camp Stanley Storage Activity (CSSA) Integrated Natural Resource
Management Plan (INRMP), Bexar County

Dear Mr. Shirley:

Texas Parks and Wildlife Department (TPWD) has received the draft INRMP referenced above for CSSA located between Boerne and San Antonio. TPWD staff has reviewed the document and offers the following comments.

Due to the presence of the federal and state listed endangered Golden-cheeked Warbler (*Dendroica chrysoparia*) and Black-capped Vireo (*Vireo atricapilla*) at CSSA, projects which could potentially impact these species or their habitat should be coordinated with the US Fish and Wildlife Service for guidance, permitting, survey protocols, and mitigation. Occurrences of the Golden-cheeked Warbler and Black-capped Vireo documented during the survey performed at CSSA in 2005 are not currently included in the TPWD Natural Diversity Database (NDD). If available, TPWD would appreciate receiving GPS location data regarding these sightings so that we may add these observations to our database for future reference. Please send the information to Bob Gottfried, Database Administrator, 3000 South IH-35, Austin, TX, 78704 or Bob.Gottfried@tpwd.state.tx.us

In addition to the Golden-cheeked Warbler and Black-capped Vireo, the following rare species could be present at CSSA:

State Listed Threatened

Comal blind salamander (*Eurycea tridentifera*)
Texas horned lizard (*Phrynosoma cornutum*)

Species of Concern

Texas salamander (*Eurycea neotenes*)
Cave myotis bat (*Myotis velifer*)

COMMISSIONERS
JOSEPH H. C. FITZSIMONS
CHAIRMAN
SAN ANTONIO
DONATO D. RAMOS
VICE-CHAIRMAN
LAREDO
MARK E. DIVINE
AMARILLO
J. ROBERT BROWN
LI PASO
T. DAN FRIEDKIN
HOUSTON
NEU S. HOLMES
HOUSTON
PETER M. HULL
SAN ANTONIO
PHILIP MONTGOMERY
DALLAS
JOHN D. PARKER
LUFKIN
LEE M. DASE
CHAIRMAN-EMERITUS
FORT WORTH
ROBERT L. COOK
EXECUTIVE DIRECTOR



Take a kid
hunting or fishing



Visit a state park
or historic site

Mr. Jason D. Shirley

Page 2

November 8, 2006

Bracted twistflower (*Streptanthus bracteatus*)

Based on records in the NDD, occurrences of the Golden-checked Warbler, Black-capped Vireo, Comal blind salamander, Texas salamander, Bracted twistflower, and a Colonial Waterbird Rookery have been documented within 1.5 miles of CSSA. Printouts and a corresponding map for these occurrence records are included for your planning reference. **Please do not include NDD occurrence printouts or maps in your draft or final documents.** Because some species are especially sensitive to collection or harassment, these records are for your reference only. Although the NDD is based on the best data available to TPWD regarding rare species, it does not include a representative inventory of rare resources in the state. The data in the NDD do not provide a definitive statement as to the presence, absence, or condition of rare resources and cannot substitute for an on-site evaluation by your qualified biologists.

Section 2.6.2 of the INRMP states that sinkholes and caverns are present on the surface and in the subsurface of the CSSA. Bat species such as the rare Cave myotis bat could occupy caves in and around CSSA. If bat caves are found at CSSA, measures should be taken to avoid adverse impacts to these areas. Projects near known bat caves containing maternity colonies should be avoided during late spring and early summer.

Section 5.2.3 of the INRMP states that chemical treatment of the red imported fire ant would be considered in areas with more than 20 mounds per acre, and treatment near facility buildings would be part of the routine grounds maintenance schedule. The red imported fire ant competes for habitat with the native Harvester ant, which is the primary food source of the Texas horned lizard. Therefore, control of the red imported fire ant could benefit the Texas horned lizard, although the use of pesticides should be minimized to ensure that no Harvester ant mounds or Texas horned lizards are adversely affected. Management guidelines for the Texas horned lizard are attached for your reference.


Section 6.2.5 of the INRMP states that an unidentified salamander was observed in a well during a downhole video camera survey. This salamander could have been a Comal blind salamander or other rare troglobitic salamander. The INRMP states that special management buffers of at least 50 feet would be established around karst features and best management practices would be implemented in association with construction activities. If future surveys confirm the presence of rare troglobitic salamanders at CSSA, TPWD would appreciate receiving data on the occurrence(s).

Mr. Jason D. Shirley
Page 3
November 8, 2006

Potential habitat for the Bracted twistflower could be present at CSSA. TPWD recommends surveys for this species prior to vegetation clearing in areas with shallow clay soil over limestone slopes or in openings in juniper-oak woodlands. If this species is found, TPWD recommends that populations be fenced off and avoided during construction. An information sheet for the Bracted twistflower is included for your reference.

I appreciate the opportunity to review and comment on this INRMP. Please call me at (512) 389-4579 if we may be of further assistance. I apologize for the lateness of our reply.

Sincerely,



Julie C. Wicker
Wildlife Habitat Assessment Program
Wildlife Division

JCW: hb.11949

Attachments



FACSIMILE COVER SHEET

Date: 11/29/06

Time: 3:15

Number of Pages (including this page): 8

To:	Mr. Jason D. Shirley	From:	Julie Wicker
Company/Division:	Camp Stanley Installation Manager	Division:	Wildlife - Habitat Assessment Program
Phone:		Phone:	(512) 389-4579
Fax:	(210) 295-7386	Fax:	(512) 389-4599

Message:

I mailed these comments regarding your Integrated Natural Resource Management Plan and a proposed road and drainage improvement project earlier this month but they came back marked "Not Deliverable as Addressed." I spoke to someone in your office who let me know what the problem might have been and I will re-send the originals this week. I have not included the attachments to the INRMP comments with this fax because they include a map and several other pages which would not likely fax well. I will include the attachments when I mail the original letters.

Please let me know if you have any questions. I apologize for the lateness of these comments.

-Julie

4200 Smith School Road
Austin, TX 78744-3291
512-389-4800
www.tpwd.state.tx.us

TPWD MISSION: To manage and conserve the natural and cultural resources of Texas and to provide hunting, fishing and outdoor recreation for the use and enjoyment of present and future generations