



United States Department of the Interior

FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407



April 18, 2011

Mr. Donald S. McLean
Training Facility Coordinator
Department of the Army
U.S. Army Installation Management Command
Headquarters, United States Army Garrison, Fort Gordon
307 Chamberlain Avenue
Fort Gordon, GA 30905-5730

Re: Biological Evaluation for Proposed Army Training Activities on the Department of
Energy Savannah River Site, Aiken, SC
FWS Log No. 42410-2011-I-0197

Dear Mr. McLean:

The U.S. Fish and Wildlife Service (Service) has reviewed the Biological Evaluation (BE) received at the 2011 U.S. Army/Service Red-cockaded Woodpecker (RCW) Workshop on the above-referenced training activity at the Department of Energy (DOE), Savannah River Site (SRS), in Aiken, Georgia. The following comments are provided in accordance with the Sikes Act, the National Environmental Policy Act (NEPA), and section 7 of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*).

The Department of the Defense (DOD) is proposing Army military training activities at the SRS site to supplement Army wide shortages of available training lands. The proposal is for non-live fire training including Army Aviation (Fixed and Rotary Wing), Light Maneuver Forces (rubber boat watercraft, wheeled vehicles, and foot traffic), and Service Support Units (Supply, Maintenance, Transportation, Health Services, Light Engineers, Military Intelligence, Chemical and Signal). According to the BE, Army activities are secondary and will not interfere with DOE missions, operations, and activities at SRS. The Fort Gordon Range Control – Training Facility Coordinator (FGRC-TFC) will implement restrictions on training requirements to minimize and avoid impacts to RCWs such as cluster restrictions and avoidance. The DOD has determined that this action is not likely to adversely affect the RCWs at SRS.

In 1996, the Army developed a framework for military training and RCW management and monitoring on Army installations within the "Management Guidelines for the Red-cockaded Woodpecker on Army Installations" (Army Guidelines). These Guidelines were revised and approved by the Service in 2007 (Hayden 2007). The Guidelines "provide standard RCW management guidance to Army installations for developing endangered species management

components (ESMCs) for the RCW as part of an installation's Integrated Natural Resource Management Plan (INRMP)." These Guidelines have been established under the authority of the Sikes Act, which provide for the cooperation between the Department of the Interior and the DOD in regards to the Endangered Species Act and the National Environmental Policy Act.

In addition, the U.S. Department of Agriculture Forest Service (FS) has been managing SRS since the 1950's with reforestation activities and prescribed fire. The 2000 Savannah River Site Red-cockaded Woodpecker Management Plan was amended in 2009 incorporating elements of both the Service's RCW Recovery Plan and the 2005 United States DOE Natural Resources Management Plan for the Savannah River Site (NRMP). The SRS RCW population is identified as 1 of 10 secondary core populations in the 2003 RCW Recovery Plan (Recovery Plan).

The Service is concerned about two separate factors regarding the proposed action. Primarily, the Army Guidelines will not directly apply given that the training is scheduled to occur in an area that is not a DOD or Army-managed installation. In addition, the SRS population has never been exposed to military training which emphasizes the importance of proper management and monitoring. Effective monitoring will be necessary for all concerned agencies to determine what factors would contribute to a potential decline in future population growth at SRS including natural, management, military training, or both. The mutual interests of SRS, the Army and the Service are to support training while achieving the recovery objective for the Savannah River Secondary Core RCW population.

Training

Based on the information in the BE and your phone conversation with Paula Sisson of this office on April 11, 2011, military training activities will not occur within the 200' buffer of cavity trees as prescribed in the Army Guidelines. Because there are 120,000 acres available for training, the FGRC-TFC has restricted all training within 200' of any RCW cavity tree and training activities within the buffer will be limited to a transient nature.

Additionally, the Service recommends that GIS coordinates for clusters are provided to Army units as part of their natural resource preparation prior to on-the-ground training. All cavity trees and cavity start trees must be marked or painted before training begins. Furthermore, training records should be provided to the Service by FGRC-TCF with information regarding Army units, their location, dates and activities on SRS.

Monitoring and Management

Both the RCW Recovery Plan and the 2007 Army Guidelines recommend an average annual growth of 5% (active clusters or PBGs). Moreover, Army Guidelines provide that all installations failing to achieve this growth rate will informally consult with the Service to determine actions that are necessary to amend limiting conditions. The population at SRS has

continued to grow since 1985 to 2009. However, for a 4 year period (2003-2006), the population at SRS remained dormant. The Recovery Plan also recommends the initiation of formal consultation if the number of active clusters decreases by 10 percent or more during one year, or decreases by 10% during a 5-year period.

The SRS population has grown from 3 active clusters in 1985 to 52 active clusters in 2009 in response to aggressive management. The population increased from 29 to 52 active clusters from 1998 to 2009, with an average annual geometric growth rate for that 11-year growth period of 0.055 (5.5%). Yet, the SRS population during 2003-2006 was stagnant at 45 active clusters for four consecutive years, without any growth. For the last five growth-years, (2004-2009) the average annual geometric growth rate was 0.029 (2.9%).

Monitoring and management are vital elements that should continue at SRS to determine the effects of training that may influence population trends. This information is important to analyze the potential for any future limitations to population growth and to assess the role of contributing natural or man-made factors, including Army training.

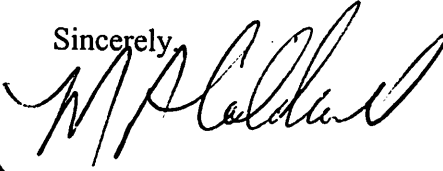
The FS RCW recovery management at SRS has been successful. However, in order to be consistent with the Army Guidelines, the Service recommends the following practices:

- 100% of the nestlings at SRS should be banded. Complete banding may provide important data if the population fails to grow or declines, relative to the subsequent analysis that would be required to identify any role of military training.
- 5 recruitment clusters should be provided each year at SRS, or 10% of the total number of active clusters (according to a phone conversation between Tracy Grazia with the FS and Paula Sisson of this office on April 12, 2011, recruitment clusters are provided by 10% each year, however, recruitment are currently overstocked). Recruitment clusters should be located no further than 1 mile from active clusters.
- SRS should anticipate a short-term RCW population goal of 5% average growth not limited by habitat until 2015.

Based on the information provided, we will concur with your determination that the proposed action is not likely to adversely affect resources under the jurisdiction of the Service that are currently protected by the Act, including the RCW. Therefore, the requirements of Section 7 of the Act have been fulfilled relative to the proposed action, and no further consultation is necessary at this time. However, obligations under Section 7 of the Act must be reconsidered if: (1) new information reveals that the proposed action may affect listed species in a manner or to an extent not previously considered, (2) the proposed action is subsequently modified to include activities which were not considered during this consultation; or (3) new species are listed or critical habitat designated that might be affected by the proposed action.

If you have any questions or comments or require additional information regarding this letter, please contact Paula Sisson of my staff at 843-727-4707 x 226.

Sincerely,


for Jay B. Herrington
Field Supervisor

JBH/PTS

cc:

Ms. Paige G. Koon, SCDNR, Columbia, SC

Mr. Will McDearman, RCW Recovery Coordinator, Jackson, MS