

Appendix E

Agency Correspondence



United States Department of the Interior

FISH AND WILDLIFE SERVICE

10711 Burnet Road, Suite 200
Austin, Texas 78758
512 490-0057
FAX 490-0974



JUL 22 2011

Dear Sir or Madam:

The U.S. Fish and Wildlife Service (Service) is requesting your agency's review and comment on the issues under your purview that could be affected by the issuance of an incidental take permit, under the Endangered Species Act of 1973, as amended, to Bexar County, Texas (applicant). The incidental take permit is for the proposed Southern Edwards Plateau (SEP) Regional Habitat Conservation Plan (RHCP), which includes Bexar and surrounding counties and would authorize incidental take of federally listed species resulting from residential, commercial, and other development activities within the plan area. On April 27, 2011, the Service published a Notice of Intent to prepare a draft Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act of 1969. The purpose of the EIS is to evaluate the impacts of, and alternatives to, the proposed issuance of the incidental take permit. The public comment period is now open and a series of five public scoping meetings have been held throughout the proposed plan area.

We welcome your agency's comments, and have attached the Notice of Intent, which describes the project and the permit area in more detail. All meeting materials provided at the public scoping meetings are available at www.sephcp.com, click the "eis and nepa process" link. We would appreciate receiving your comments no later than August 22, 2011, either in writing to our address above, or by email to FW2_AUES_Consult@fws.gov. Please feel free to contact Christina Williams at 512-490-0057, extension 235 with any questions or comments.

Sincerely,

Adam Zerrenner
Adam Zerrenner
Field Supervisor

Enc: Notice of Intent for the proposed Southern Edwards Plateau Regional Habitat Conservation Plan

TAKE PRIDE
IN AMERICA 

Texas State Soil and Water Conservation Board
P.O. Box 658
Temple, TX 76503-0658

Texas Department of Transportation
7901 North IH-35
Austin, TX 78761

Bexar Metropolitan Water District
P. O. Box 245994
San Antonio, Texas 78224

Texas Division of Emergency Management
5805 North Lamar
Austin, TX 78752

U.S. Department of Agriculture
Natural Resources Conservation Service
101 S. Main Street
Temple, TX 76501

San Antonio Water Systems
P.O. Box 2449
San Antonio, TX 78298-2449

U.S. Environmental Protection Agency
Regional Administrator
1445 Ross Ave, Suite 1200
Dallas, TX 75202

U.S. Dept. of Housing & Urban Development
451 Seventh St., S.W.
Washington, DC 20410

Kevin Ward, Executive Administrator
Texas Water Development Board
P. O. Box 13231
Austin, TX 78711

U.S. Army Corps of Engineers
Ft. Worth District, Environmental Br.
P.O. Box 17300
Ft. Worth, TX 76102

Federal Emergency Management
Federal Center Plaza
500 C Street, S.W.
Washington, DC 20472

Texas Water Development Board
Environmental Review
P.O. Box 13231
Austin, TX 78701

U.S. Army Corps of Engineers
Ft. Worth District, Regulatory Br.
P.O. Box 17300
Fort Worth, TX 76102

General Services Administration
18th and F Streets, N.W.
Washington, DC 20405

General Manager
Edwards Aquifer Authority
1615 N. St. Mary's Street
San Antonio, TX 78215-1415

Federal Highway Administration
300 East 8th Street
Rm 890, Federal Bldg.
Austin, TX 78701

Bill West, General Manager
Guadalupe-Blanco River Authority
933 East Court Street
Seguin, TX 78155

Texas Attorney General's Office
Environmental Protection Division
P.O. Box 12548
Austin, TX 78711

Randolph Public Affairs Office
12FTW/PA
Randolph AFB, TX 78150

Todd Staples, Commissioner
Texas Department of Agriculture
P.O. Box 12847
Austin, TX 78711

Railroad Commission of Texas
P.O. Box 12967
Austin, Texas 78711-2967

Commander
U.S. Army Garrison
1206 Stanley Road, Suite A
Fort Sam Houston, TX 78234-5001

Texas Department of Agriculture
Mike McMurry
P.O. Box 12847
Austin, TX 78711

Jerry Patterson, Commissioner
Texas General Land Office
1700 Congress Ave.
Austin, TX 78701-1495

Commander
1701 Kenly Ave., Ste 201
Lackland AFB 78236

Mark R. Vickery, Executive Director
Texas Commission on Env. Quality
P.O. Box 13087
Austin, TX 78711

U.S. Geological Survey
Texas Water Science Center
1505 Ferguson Lane
Austin, TX 78754

U.S. Geological Survey
5563 DeZavala, Suite 290
San Antonio, TX 78249

Carter Smith, Executive Director
Texas Parks and Wildlife Department
4200 Smith School Rd.
Austin, TX 78744

Texas Department of Transportation
Environmental Affairs Division
125 E. 11th Street
Austin, TX 78701-2483

United States Department of Agriculture



Natural Resources Conservation Service
101 S. Main St.
Temple, TX 76501

August 2, 2011

Mr. Adam Zerrenner
Field Supervisor
U. S. Fish and Wildlife Service
10711 Burnet Road, Suite 200
Austin, TX 78758

Re: Notice of Intent for the proposed Southern Edwards Plateau Regional Habitat Conservation Plan

Dear Mr. Zerrenner:

The Natural Resources Conservation Service (NRCS) would like to thank the U.S. Department of the Interior Fish and Wildlife Service (FWS) for the opportunity to comment on the notice of intent for the proposed Southern Edwards Plateau Regional Habitat Conservation Plan (HCP).

We support the development of the HCP proposed in the notice of intent and will help however we can with the plan and its implementation. NRCS works closely with the scientific and academic communities to develop plans of action to conserve, enhance, and restore the habitats for listed endangered species. These actions are taken in cooperation with private landowner and managers in a voluntary manner to apply those conservation practices that provide the most benefit to species and reduce loss due to habitat degradation.

Should you require any additional information or have additional questions, please contact Susan Baggett at 254-742-9805.

Sincerely,

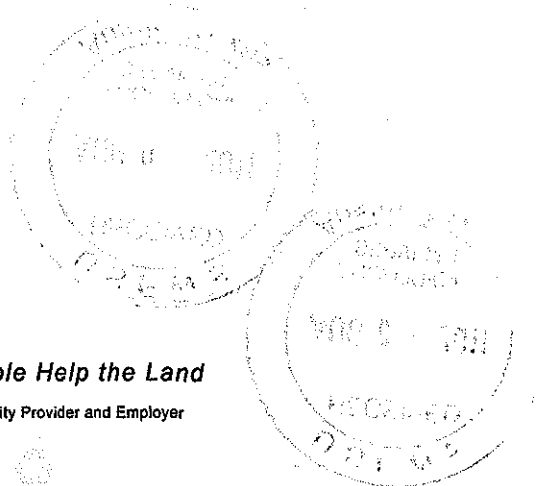
SALVADOR SALINAS
State Conservationist

cc: Susan Baggett, SRC, NRCS, Temple
Russell Castro, Biologist, NRCS, Temple

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GENERAL LAND OFFICE

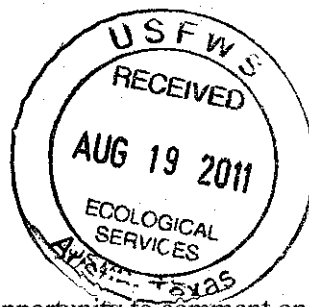
JERRY PATTERSON, COMMISSIONER

August 16, 2011

Mr. Adam Zerrenner
Fish and Wildlife Service
10711 Burnet Road, Suite 200
Austin, TX 78758

RE: Southern Edwards Plateau Regional Habitat Conservation Plan

Dear Mr. Zerrenner:



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On behalf of Commissioner Patterson, I would like to thank you for the opportunity to comment on the draft Southern Edwards Plateau Regional Habitat Conservation Plan proposed by Bexar County, and the intent by the Service to prepare an Environmental Impact Statement (EIS). As you may know, the General Land Office (GLO) is responsible for managing state owned land dedicated to the Permanent School Fund (PSF). This includes protecting the natural resources of these lands for all Texans, and maximizing revenue to support public education. The GLO agrees that there should be steps taken to protect the threatened and endangered species within the plan area, and understands the need to streamline the Endangered Species Act take permitting process. However there are many state owned assets within the area covered by the draft plan, and the GLO is concerned how the draft plan may affect the ability to generate revenue for the PSF with these assets. The draft plan includes the statement "The alternative plan would allow authorization of all anticipated incidental take for the covered species across the entire plan area (excluding Comal County, since a separate plan would cover this area) over the next 30 years." This potential limitation on responsible development could greatly impact the ability of the GLO to generate revenue for the PSF and fund public education. The GLO requests that the EIS specifically addresses the plans impact to the PSF and the ability to generate revenue to support public education. The GLO also requests to be involved in the further development and implementation of the Southern Edwards Plateau Regional Habitat Conservation Plan, and to be invited to participate in any further meetings to discuss the proposed plan.

If you have any additional questions or concerns, please contact Ned Polk at (512) 463-5030 or by e-mail at ned.polk@glo.texas.gov.

Sincerely,

Rene D. Truan
Deputy Commissioner
General Land Office

Stephen F. Austin Building • 1700 North Congress Avenue • Austin, Texas 78701-1495

Post Office Box 12873 • Austin, Texas 78711-2873

512-463-5001 • 800-998-4GLO

www.glo.state.tx.us



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

August 17, 2011

James V. Cannizzo, Attorney Advisor, Camp Stanley (Army Material Command, AMC) and Retained Army Functions at Fort Sam Houston and Camp Bullis

Adam Zerrenner, Field Supervisor
U.S. Fish and Wildlife Service
Austin Ecological Services Office
10711 Burnet Road Suite 200
Austin, Texas 78758

Dear Mr Zerrenner,

Thank you for the opportunity to respond to your July 22nd, 2011 letter requesting comments on the proposed Southern Edwards Plateau Habitat Conservation Plan (HCP) and notice to prepare an Environmental Impact Statement. As a federal agency, we will not be covered by the incidental take provisions the plan is expected to result in, however, we support the plan because we believe it will provide a streamlined method for management of development around Camp Bullis and Camp Stanley which should result in a higher rate of compliance by nonfederal parties.

We are aware of only two site specific habitat conservation plans ever being done in the Bexar County area (La Cantera development for Bexar County listed Karst Invertebrates and Lumbermans/PGA Village for Golden-cheeked Warbler, GCWA). With many thousands of acres of development occurring in the Bexar County area, it is likely many developments ignored or otherwise avoided performing species mitigation. We believe this development is displacing GCWA onto our military installations. Having a streamlined means of complying as has been the case with a regional HCP in Travis County since 1996 should encourage more developers to comply with the Endangered Species Act. We hope that having a regional HCP will stop the net loss of habitat in this area and result in some mitigation being done.

Camp Bullis and Camp Stanley cannot and should not alone bear the burden of compliance with the Endangered Species Act. We are becoming the "lone island of refuge" for these species. The populations of GCWA on Camp Bullis have dramatically increased the past several years. On Bullis we have gained approximately 1,250 acres of occupied habitat the last four years, including over 416 more occupied acres in 2011. In addition to more areas being occupied, GCWA population densities have increased.

Points of contact are Matthew Lucas Cooksey, Camp Bullis Wildlife Biologist at (210) 295-7889 or me at (210) 295-7082/9830.

Sincerely,

A handwritten signature in black ink that reads "James V. Cannizzo".

James V. Cannizzo
Administrative and Civil Law Advisor



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

March 17, 2015

Office of the Staff Judge Advocate

Public Comments Processing, Attn: FWS-R2-ES-2014-0053
Division of Policy and Directives Management
U.S. Fish and Wildlife Service; MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803

To whom it may concern,

Thank you for the opportunity to comment on the Southern Edwards Plateau Habitat Conservation Plan (SEPHCP) and draft Environmental Impact Statement (EIS). As a federal agency, we will not be covered by the incidental take of this plan, however, we support the plan because we believe it will provide a streamlined method for management of development around Camp Stanley and Camp Bullis which should improve compliance by nonfederal parties.

We are aware of only a handful of site specific habitat conservation plans and Section 7 consultations ever being done in Bexar County. With tens of thousands of acres of development occurring in the county, it is questionable whether many developers complied with performing endangered species mitigation. We believe development is displacing Golden-cheeked Warbler (GCWA) onto our military installations. Having a streamlined means of complying, as has been the case with a regional HCP in Travis County since 1996, should encourage more developers to comply with the Endangered Species Act. We hope that having a regional HCP will stop the net loss of habitat in the overall area and result in more mitigation being done.

We are concerned that the Biological Advisor Team's (BAT's) recommendation for a specific percentage of GCWA habitat to be obtained within Bexar County is not in the draft plan or EIS. We understand the cost realities over the BAT's figure of 60% may make the plan too expensive to implement, but believe some minimal percentage (such as 30% within Bexar County and 5 miles surrounding) is needed so that it doesn't end up that all the mitigation is done outside of Bexar County. Doing so would leave Camp Stanley and Camp Bullis (and Government Canyon State Natural Area, a few city owned parks and Proposition 1 tracts and a few tracts Camp Bullis helped set up as mitigation properties) as the only remaining GCWA habitat in Bexar County.

Sincerely,

A handwritten signature in black ink, reading "James V. Cannizzo".

James V. Cannizzo
Attorney Advisor, Camp Stanley (Army Material
Command, AMC) and Retained Army Functions at
Fort Sam Houston and Camp Bullis