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Title:
Comments: From: Allen, Robert <robert_allen@fws.gov>
Sent: Tuesday, October 8, 2019 12:24 PM
To: Taylor, Eddie -FS; Potts, Robert S -FS
Subject: USFWS Comments on National Forests and Grasslands in Texas; Oil and Gas Leasing Availability Analysis Environmental Impact Statement
Attachments: 2019-I-2335-EIS for Oil and Gas Leases on NFGT Lands.pdfGood Afternoon Gentlemen,Attached are our comments on this project. A hard copy is in the mail.Robert Allen
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United States Department of the Interior
In Reply Refer To:
02ETAROO-2019-1-2335
Mr. Eddie Taylor
Forest Supervisor
FISH AND WILDLIFE SERVICE
Ecological Services2005 NE Green Oaks Blvd., Suite 140
Arlington, Texas 76006October 8, 2019
National Forests and Grasslands in Texas
2221 North Raguet
Lufkin, Texas 75904Mr. Taylor,Thank you for the opportunity to provide information for the preparation of an Environmental Impact Statement (EIS) for the proposed action and your ongoing partnership in the conservation offish and wildlife. As the NOI states, the Forest Service proposes to identify National Forests and Grasslands in Texas (NFGT) administered lands that would be administratively available for future oil and gas leasing, identify which stipulations would be applied to protect resources on lands available for future oil and gas leasing, and determine if the 1996 NFGT Forest Plan should be amended. Currently, four listed species are known to occur on NFGT lands; the endangered red-cockaded woodpecker (Picoides borealis, RCW) and Navasota ladies tresses (Spiranthes parksii, NL T), and threatened Louisiana pine snake (Pituophis ruthveni, LPS) and Neches River rose-mallow (Hibiscus dasycalyx, NNRM).The NOI includes the following three proposed Forest Plan amendments are directly related to
listed species:[bull] "NSO for the limestone areas on the Lyndon B. Johnson (LBJ) National Grassland (NG), the blackland prairies on the Sam Houston NF and Caddo NG, habitat areas for the Louisiana Pine Snake, RCW cluster sites, slopes greater than 15 percent, inclusional wetlands, sensitive aquatic areas, and natural springs."
[bull] The plan must include plan components to maintain or restore: "Rare aquatic and
terrestrial plant and animal communities. "
[bull] The responsible official shall 'provide the ecological conditions necessary to: contribute to the recovery of federally listed threatened and endangered species. "
The proposed action would include No Surface Occupancy (NSO) stipulations to protect natural heritage botanical areas, special status species, unique prairie vegetation communities, inclusional wetlands, sensitive aquatic areas, natural springs, and steep slopes. The NOI also states that several NSO and Controlled Surface Use (CSU) stipulations would require sitespecific surveys to identify areas where the stipulation applies.With the

implementation of NSO stipulations to protect inclusional wetlands, sensitive aquatic areas, and natural springs, it is anticipated that habitat for the NNRM would be avoided as it is a resident of scrub-shrub wetlands. The NLT has been documented in the Black Branch Barrens
area within compartment 84 of the Angelina National Forest. NLT are extremely slow-growing,
long-lived, and it is believed that plants require more than one year ofphotosynthate storage to successfully send up a bloom stalk. If local conditions have not been favorable for forming sufficient below-ground reserves, the plant may not bloom. Thus designating NSO or CSU stipulations for leases within suitable NL T based on site-specific surveys, which may not capture the presence ofNLT, may not provide adequate protections. We recommend broader conservation measures, such as compartment wide NSO or exempting NL T habitat from leases to avoid impacting the species.The NFGT supports three RCW recovery populations on the Sam Houston National Forest, Angelina-Sabine National Forest and the Davy Crockett National Forest with recovery population goals of350, 350, and 250 potential breeding groups, respectively. Currently, the Sam Houston National Forest supports 295 potential breeding groups, the Angelina-Sabine National Forest supports 124 potential breeding groups and the Davy Crockett National Forest supports 80 potential breeding groups. While the proposed NSO and CSU stipulations address existing RCW clusters/potential breeding groups, they do not account for the additional area necessary for the species to attain its recovery goal for each National Forest as demonstrated by the above population totals. Based on past oil/gas well pad development on the NFGT, to avoid erosion, flooding, and access issues, well pads are typically located on higher elevations resulting in the loss of potential RCW cluster locations and foraging habitat. As a result, the RCW cluster carrying capacity of some Management Area - 2 localities have diminished. We recommend consideration of additional measures, such as NSO for the entire Management Area - 2 or exempting Management Area -2 from leases, in order to aid those National Forests in attaining their RCW population recovery goals.One of the two remaining LPS populations in Texas is believe to occur on the southern portion of the Angelina National Forest within Management Areas - 2 and 6. The LPS is known from and associated with a disjunct portion of the historical longleaf-dominated pine ecosystem that existed in west-central Louisiana and east Texas. Its cryptic and semi-fossorial behaviors make detecting the species difficult. Even in known occupied sites, individuals are rarely encountered. Thus designating NSO or CSU stipulations for leases within suitable LPS based on site-specific surveys, which may not capture the presence of LPS, may not provide adequate protections. We recommend implementing NSO stipulations on the entirety of Management Areas - 2 and 6 within the Angelina National Forest or exempting LPS habitat from leases to avoid impacting the species.In summary, the EIS should evaluate the potential effects of oil and gas development on the NRRM, NLT, LPS, and RCW. This analysis should include potential impacts to recovery efforts for the RCW and LPS, particularly within Management Area - 2 and 6. A preliminary list of issues to be reviewed during the analysis was provided in the NOI including:[bull] Impacts on rare plants and ecosystems.
[bull] Fragmentation, removal, or disturbances on wildlife corridors, critical wildlife habitats,
and other important or sensitive wildlife habitats.
[bull] Impacts on threatened and endangered species, such as the RCW and Louisiana pine
snake.A thorough analysis of these issues is crucial to the NFGT in meeting RCW population goals and addresses the Forest Service's responsibilities under Section 7(a)(1) of the Endangered Species Act as amended (16 U.S.C. 1531-1544). The NOI also mentions the option to analyze additional alternatives that would add NSO stipulations to the Longleaf Pine Special Area and all lands within RCW Habitat Management Areas. We recommend and fully support analyzing this alternative as it may be important to the recovery of the RCW and LPS. We also recommend that the alternatives analysis incorporate the potential for future captive releases of LPS to augment the Angelina National Forest population and re-establish a population on the Sabine National Forest.Thank you again for the opportunity to provide information on the proposed action. If you have any questions, please contact Wildlife Biologist Robert Allen of my staff at (936) 569-7981 ext. 4017.
Sincerely,Debra Bills
Field Supervisor
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