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Fish and Wildlife Service

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January 24, 2017

Robert K. Larimore, Chief
Department of the Army
Installation Management Agency
Garrison Commander
5751 Constitution Loop, Suite 500
Fort Benning Army Installation
Fort Benning, GA 31905

RE: FWS Log # 04EG1000-2017-I-0675

Dear Mr. Larimore:

This letter responds to your letter requesting comment on the installation of lightning protection equipment at Malone 16. Based on your letter, a counterpoise loop will be installed in a triangular configuration approximately 70 feet northwest of inactive RCW cavity tree #2097. We have reviewed the information and provide the following comments in accordance with the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and section 7(a)(2) of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 et seq.) relative to the federally endangered red-cockaded woodpecker (*Picodes borealis*).

Installation and Construction Details (Action):

- The construction will not take place in current, potential, or future RCW habitat.
- All activities will occur outside of the drip line of cavity tree #2097, and consequently not affect the root system.
- No equipment will be staged within RCW habitat during daylight hours, and will returned to main post each night.
- The construction window is the first two weeks of February, so there will be no possibility of disturbing RCW during breeding season.

Based on the information provided, the requirements of the ESA have been fulfilled relative to this action, and no further consultation is necessary. Fort Benning's obligations under section 7 of the ESA must be reconsidered (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 is designated that might be affected by the proposed action.

If you have any questions, comments or require additional information regarding this letter, please contact John Doresky at (706) 544-6030.

Sincerely,



For:

Donald Imm
Field Supervisor



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
IMCOM DIRECTORATE-TRAINING
HEADQUARTERS, UNITED STATES ARMY GARRISON
1 KARKER STREET, MCGINNIS-WICKAM HALL, SUITE 5900
FORT BENNING, GEORGIA 31905-5000

January 17, 2017

Conservation Branch

RECEIVED

JAN 18 2017

Ft. Benning, GA
USFWS

Dr. Donald Imm
Field Supervisor
U.S. Fish and Wildlife Service
West Park Center
105 West Park Drive, Suite D
Athens, GA 30605

Dear Dr. Imm:

Fort Benning is proposing to install lightning protection equipment at training range Malone 16 within the 200ft boundary of active RCW cluster M06-C. A counterpoise loop (i.e. a network of copper cable and rods used for lightning dispersion) will be installed in a triangular configuration 18in underground approximately 70ft northwest of inactive RCW cavity tree #2097 (see enclosure). The counterpoise loop will be connected to the existing lightning grounding system already in place at structure M6775 (see enclosure). Construction may take up to three days and is planned to occur during the first two weeks of February 2017.

Fort Benning does not expect this action to impact the RCW at cluster M06-C for several reasons. The construction will not occur in current, potential or future RCW habitat, but rather in an open area. The construction will also take place well beyond the drip line of inactive cavity tree #2097 and consequently will not affect the root system. Since ALL equipment will be returned to main post each night, no construction will occur at night. No equipment will be staged within RCW habitat during daylight hours during construction. Lastly, construction will take place during the first two weeks of February 2017 so there will be no possibility of disturbing the RCW during breeding season.

Although the proposed action will take place within 200ft of inactive RCW cavity tree #2097 in cluster M06-C, Fort Benning concludes that this project is not likely to adversely affect the RCW and requests your review and concurrence of this action. The point of contact is Mr. Jonathan Neufeldt at 706-544-7705 or jonathan.h.neufeldt.civ@mail.mil.

Sincerely,

Robert K. Larimore
Chief, Environmental Management
Division

Enclosure