



United States Department of the Interior

Fish and Wildlife Service
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West Georgia Sub Office
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September 11, 2019

Coastal Sub Office
4980 Wildlife Drive
Townsend, Georgia 31331

Kirk W. Ticknor, Chief
Department of the Army
Installation Management Agency
5751 Constitution Loop, Suite 500
Fort Benning Army Installation
Fort Benning, GA 31905

Re: FWS Log No. **2019-I-2479**

Dear Kirk Ticknor:

This letter is the U.S. Fish and Wildlife Service's (Service) response to the letter we received on September 4, 2019. Fort Benning is proposing to change the marking strategy on 92 Protected Clusters (PCs) on the Installation (Table 1, below). The new marking strategy will consist of changing the current two white bands with signage placed at 200', to a single white band and removal of the signs marking the 200" buffer. These PCs are dispersed across the Installation from the southern boundary of the South Range Complex to the northern edge of the Northwest Range Complex and Hastings Range on Fort Benning in Chattahoochee County. We submit the following comments under provisions of the Migratory Bird Treaty Act (16 U.S.C. 703, *et seq.*), and the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531, *et seq.*).

Currently, the areas proposed for the new marking strategy fall within Surface Danger Zones and/or areas considered dudded with unexploded ordnance. Under these designations there is virtually no training (mounted or dismounted) that occurs in the vicinity of the clusters identified for the above changes. In the rare event training does occur in these areas, Fort Benning staff and soldiers will be trained to maintain the 200' buffer around any tree with a single white band.

Maintenance of the PCs under the new marking strategy will remain under the approved RCW Population Monitoring Plan from April 2019. The signage will not be maintained (adjusted as new trees are found) following the removal. However, Fort Benning will be painting the new cavity trees with a single white band, tags, and obtain their position using a GPS.

TABLE 1: Clusters Included in the Marking Strategy

Range Complex - Range Fans	Cluster #	Training Area - Cluster #	Old Cluster Name	New Training Area Designation	Historical Cluster Names	2019 STATUS	Cluster Type
Central Malone Range Complex (non-dudded)	209	C06-209	M06-K	C06	M06-12		PC
	210	C06-210	M06-A	C06	M06-01	ACTIVE	PC
	211	C06-211	M06-L	C06	M06-13	ACTIVE	PC
	213	C06-213	M06-D	C06	M06-04		PC
	214	C06-214	M06-H	C06	M06-07	ACTIVE	PC
	215	C06-215	M06-I	C06	M06-08		PC
	216	CD1-216	M06-E	CD1	M06-05	ACTIVE	PC
	217	C06-217	M06-G	C06	M06-06b	ACTIVE	PC
	219	C06-219	M06-B	C06	M06-02	ACTIVE	PC
	220	C06-220	M06-N	C06	M06-14		PC
	221	C06-221	M06-F	C06	6-06a, M06-06		PC
	227	C06-227	M01-A	C06	M01-01	ACTIVE	PC
228	C06-228	M06-J	C06	M06-10		PC	
DMPRC Range	265	C25-265	DRC-D	C25	J06-01b		PC
	266	C25-266	DRC-C	C25	8-01, J06-01	ACTIVE	PC
	276	C25-276	DRC-B	C25	D13-02	ACTIVE	PC
	277	C25-277	DRC-A	C25	D13-01		PC
EOD Range (dudded)	259	C32-259	E05-B	C32	E08-04	ACTIVE	PC
	255	EOD-255	E08-D	EOD	****		PC
	256	EOD-256	E08-C	EOD	E08-05		PC
	257	EOD-257	E08-B	EOD	E08-03		PC
	258	EOD-258	E08-A	EOD	E08-02		PC
	322	EOD-322	E05-Bb	EOD	****	ACTIVE	PC
Northwest Range Complex (non-dudded)	019	N20-019	O30-A	N20	O05-03		PC
	020	N20-020	O24-D	N20	O04-03b	ACTIVE	PC
	028	N20-028	O24-C	N20	4-03a, O04-03		PC
	029	N20-029	O24-A	N20	O04-01		PC
	030	N20-030	O24-B	N20	O04-02		PC
	036	N20-036	O23-A	N20	O06-03		PC
	037	N20-037	O16-A	N20	O04-05		PC
	040	N20-040	O32-A	N20	O06-04		PC
	041	N20-041	O17-B	N20	O08-02	ACTIVE	PC
	046	N20-046	O17-A	N20	O08-01	ACTIVE	PC
	054	N20-054	O21-A	N20	O07-03	ACTIVE	PC
	055	N20-055	O21-B	N20	O08-03		PC
	045	N21-045	O33-A	N21	****	ACTIVE	PC
	053	N21-053	O34-A	N21	O07-01		PC

Range Complex - Range Fans	Cluster #	Training Area - Cluster #	Old Cluster Name	New Training Area Designation	Historical Cluster Names	2019 STATUS	Cluster Type
Ruth, Brooks, Ware, Carmouche, DMPRC, Hastings, Ranges	072	N28-072	K14-B	N28	K08-02		PC
	073	N28-073	K14-A	N28	K08-01	ACTIVE	PC
	066	N29-066	K13-D	N29	****		PC
	067	N29-067	K12-B	N29	K13-06		PC
	068	N29-068	K12-C	N29	K12-Bb	ACTIVE	PC
	074	N29-074	K13-A	N29	K13-01		PC
	075	N29-075	K13-C	N29	K13-05	ACTIVE	PC
	076	N29-076	K13-B	N29	K13-02	ACTIVE	PC
	077	N29-077	K12-A	N29	K13-04	ACTIVE	PC
	081	N32-081	K20-A	N32	K09-01		PC
	089	N32-089	K20-B	N32	K09-02	ACTIVE	PC
095	N32-095	K20-D	N32	K20-SAT		PC	
Dixie Road Ranges	400	S13-400	A02-A	S13	A04-01	ACTIVE	PC
	401	S13-401	A29-B	S13	****	ACTIVE	PC
	409	S13-409	A29-A	S13	A02-02		PC
	416	S13-416	A28-B	S13	A18-02	ACTIVE	PC
	417	S13-417	A28-A	S13	A18-01	ACTIVE	PC
	402	S14-402	A03-C	S14	A04-02b	ACTIVE	PC
	403	S14-403	A03-A	S14	4-02a, A04	ACTIVE	PC
	404	S14-404	A30-F	S14	A01-06		PC
	405	S14-405	A30-E	S14	A01-05	ACTIVE	PC
	406	S14-406	A30-A	S14	A01-01	ACTIVE	PC
	407	S14-407	A30-I	S14	A30-Db	ACTIVE	PC
	408	S14-408	A30-C	S14	A01-03	ACTIVE	PC
	410	S14-410	A30-J	S14	A30-Gb	ACTIVE	PC
	411	S14-411	A30-G	S14	A01-07		PC
	412	S14-412	A30-D	S14	A01-04	ACTIVE	PC
	413	S14-413	A30-H	S14	A01-08	ACTIVE	PC
	415	S14-415	A30-B	S14	A01-02		PC
	428	S17-428	A06-B	S17	****	ACTIVE	PC
	473	S17-473	A06-A	S17	A06-02		PC
	497	S18-497	A08-A	S18	A06-01		PC
523	S19-523	A09-A	S19	A07-01		PC	
524	S19-524	A09-B	S19	A07-02	ACTIVE	PC	
542	S19-542	A09-C	S19	A07-03		PC	
Maertens,	543	S20-543	A10-C	S20	A26-06b		PC
Martin,	546	S20-546	A10-A	S20	A08-02a, A08-02	ACTIVE	PC
Krilling, Buchanan,	554	S20-554	A10-D	S20	****		PC
Ranges	555	S20-555	A10-B	S20	A08-02b	ACTIVE	PC


Range Complex - Range Fans	Cluster #	Training Area - Cluster #	Old Cluster Name	New Training Area Designation	Historical Cluster Names	2019 STATUS	Cluster Type
Ware Range	048	N23-048	O19-B	N23	K02-01b	ACTIVE	PC
	056	N23-056	O18-A	N23	O09-02		PC
	057	N23-057	O19-A	N23	2-01a, K02	ACTIVE	PC
Carmouche Range & DMPC	062	N24-062	K03-A	N24	K01-01	ACTIVE	PC
Ruth Range	061	N25-061	K07-A	N25	K05-01	ACTIVE	PC
Ruth, Brooks, Ware, Carmouche, DMPC, Hastings, Ranges	072	N28-072	K14-B	N28	K08-02		PC
	073	N28-073	K14-A	N28	K08-01	ACTIVE	PC
	066	N29-066	K13-D	N29	****		PC
	067	N29-067	K12-B	N29	K13-06		PC
	068	N29-068	K12-C	N29	K12-Bb	ACTIVE	PC
	074	N29-074	K13-A	N29	K13-01		PC
	075	N29-075	K13-C	N29	K13-05	ACTIVE	PC
	076	N29-076	K13-B	N29	K13-02	ACTIVE	PC
	077	N29-077	K12-A	N29	K13-04	ACTIVE	PC
	081	N32-081	K20-A	N32	K09-01		PC
089	N32-089	K20-B	N32	K09-02	ACTIVE	PC	
095	N32-095	K20-D	N32	K20-SAT		PC	
UC, changing back to Single Banded PC	556	S20-556	A11-A	S20	A08-01	ACTIVE	PC
Buchanan, Coolidge Ranges	548	S21-548	A11-C	S21	A08-04		PC
	558	S21-558	A11-B	S21	A08-03		PC
Dixie Road Ranges, Galloway, Griswold, Ranges,	461	S26-461	A24-B	S26	A17-02		PC
	462	S26-462	A24-A	S26	A17-01		PC
	489	S26-489	A24-D	S26	A17-07	ACTIVE	PC
	490	S26-490	A24-C	S26	A17-05	Inactive-Z	PC
	509	S26-509	A23-A	S26	A15-07		PC
	510	S26-510	A23-C	S26	A15-09w		PC
	511	S26-511	A23-E	S26	****	ACTIVE	PC
	533	S26-533	A23-B	S26	A15-09e		PC
534	S26-534	A23-D	S26	A15-10		PC	
South Range Complex (duded)	429	SD1-429	A20-04	SD1	****		A20
	544	SD1-544	A20-06	SD1	****		A20
	545	SD1-545	A20-05	SD1	****	ACTIVE	A20
	549	SD1-549	A20-02	SD1	****	UNKNOWN	NM

Based on our analysis with the information you provided regarding the proposed action, the Service has determined the Action, *is not likely to adversely affect* the RCW. However, if new information becomes available or changes in the project occur that may involve federally listed species, further consultation with the Service will be required.

Your requirements under section 7(a)(2) of the Endangered Species Act have been fulfilled and based on the information you provided we concur with your finding, and, no further action is required.

If you have any questions or concerns about this consultation or the consultation process in general, please feel free to contact John Doresky at (706) 544-6030.

Sincerely,


For: Donald Imm
Field Supervisor