



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
2405 GUN SHED ROAD
JOINT BASE SAN ANTONIO FORT SAM HOUSTON, TX 78234-1223

September 20, 2017

Ms. Debra Bills
Field Supervisor
USFWS Arlington Field Office, Ecological Services
2005 Northeast Green Oaks Boulevard, Suite 140
Arlington, Texas 76006

Dear Ms. Bills,

The Army Installation Management Command Headquarters (IMCOM-HQ) is dedicated to supporting Fort Hood and Fort Sill in maintaining the successful status and recovery of the black-capped vireo. To prevent population declines that could lead to relisting the species, IMCOM-HQ has coordinated with the installations and will ensure the black-capped vireo (BCVI) management programs continue to be adaptively managed and responsive to population indicators through the authority that is established by the Sikes Act [16 USC 671 et seq] for federal military lands and their respective Integrated Natural Resources Management Plans (INRMPs).

The appropriation and use of funds for delisted species on DoD lands is authorized under 16 USC 671 et seq and executed through projects outlined in INRMPs in accordance with the Sikes Act, DoD and Army regulations. Army INRMPs carry the authority of the Sikes Act, as DoD's long-term military land management, providing for both species and ecosystem management. The INRMP provides no less assurance than a Cooperative Management Agreement (CMA). In fact, the Sikes Act requires that INRMPs be implemented, subject to the availability of appropriated funds. The DoD defines "INRMP Implementation" as: actively requesting and using funds in support of INRMP goals and objectives, ensuring trained personnel perform INRMP tasks, inviting annual feedback from its partners, and evaluating and documenting INRMP actions and effectiveness.

Regarding timeframes for INRMP implementation, INRMPs adaptively manage species and ecosystems through regular reviews and collaboration with our USFWS and State partners. In accordance with the Sikes Act, INRMPs must be reviewed for operation and effect not less often than every 5 years, be prepared in cooperation with the USFWS and State fish and wildlife agencies, and reflect the mutual agreement of the DoD, USFWS, and State parties regarding conservation, protections and management of fish and wildlife resources. Army installations are also directed under DoDI 4715.03 and AR 200-1 to conduct annual INRMP reviews and invite the USFWS and State to participate. Under these regulations, it is the Army's intent to make INRMPs living documents that reflect a continual conversation with local fish and wildlife experts from each of the parties. As such, Fort Sill and Fort Hood are required to review their INRMPs

within the year and should evaluate and incorporate appropriate information from the USFWS BCVI Post-Delisting Monitoring Plan.

Given a delisting decision, the BCVI would still be protected under the federal Migratory Bird Treaty Act (MBTA). The current INRMPs for both Fort Hood and Fort Sill have complete MBTA sections to protect and conserve migratory birds. This bolsters the Army's commitment to wildlife management via our INRMPs, even when regulatory mechanisms and status change.

Finally, as part of INRMP implementation, Fort Hood and Fort Sill shall facilitate access for Federal and State conservation officials, in accordance with DoDI 4715.03 and the installations' operational, security, and safety policies, to conduct species surveys. This can directly support the identified BCVI monitoring activities proposed in the USFWS Post Delisting Monitoring Plan.

I welcome and look forward to any additional conversations that may assist the Service in their effort to make a delisting decision. Please feel free to contact my Natural Resources Program Manager, Ms. Stephanie A. Sarver, (210) 466-0573, stephanie.a.sarver2.civ@mail.mil, at any time.

Sincerely,



David P. Giffin
Chief, Environmental Division

CF:
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U.S. Army Environmental Command
IMCOM Directorate – Readiness
IMCOM Directorate – Training
U.S. Army Garrison, Fort Hood
U.S. Army Garrison, Fort Sill