



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT SAM HOUSTON
1206 STANLEY ROAD SUITE A
FORT SAM HOUSTON, TX 78234-5001

REPLY TO
ATTENTION OF

Office of the Commander

DEC 11 2008

T.C. Broadnax,
Assistant City Manager and Interim Director
Planning and Community Development
City of San Antonio
P.O. Box 839966
San Antonio, Texas 78283-3966

Robert Murdock, Brig. Gen. USAF (Ret.)
Director, Office of Military Affairs
City of San Antonio
PO Box 839966
San Antonio, Texas 78283-3966

Dear Mr. Broadnax and Mr. Murdock,

Thank you for the opportunity to respond to your staff's December 3, 2008 notification on Master Development Plan (MDP) # 014A-07 Rising Moon Ranch, and two associated plats, 080303 and 080360a, for a 335 acre development about 3 miles west of Camp Bullis along Scenic Loop Road. We provide the following comments.

A part of the tract is within the Camp Bullis 3 mile light buffer zone and this tract is so large that light from the whole tract may affect Camp Bullis. Continuing to place high density development within the 3 mile light buffer could also create many light issues for military training operations conducted on Camp Bullis if dark sky lighting is not used. Night-time lighting from new developments is already interfering with night vision goggle (NVG) training on Camp Bullis. Lighting causes a halo effect and can greatly reduce the effective distance for NVGs. Night training (land navigation, helicopters, etc) is done in many different areas of Camp Bullis.

Developing this tract may displace endangered species onto Camp Bullis. Surveys of Golden-cheeked Warblers, a federally listed endangered species, have shown a 50% increase on Camp Bullis in the past 5 years. We believe this is caused by the large-scale clear-cutting of oak and juniper trees within 5 miles of Camp Bullis. Increased Warbler populations on Camp Bullis trigger further Endangered Species Act restrictions on military training. About 10,000 of the 28,000 acres of Camp Bullis are potential habitat (3,300 acres are currently occupied habitat, and this increases as displacement occurs and increases the restrictions on our field training). We believe that any development within 5 miles of Camp Bullis which involves substantial clear-cutting of thick stands of old growth juniper and oak trees should be preceded by an endangered species survey, as was done by the RIM developers this year for the 106 acre tract on the southwest corner of Camp Bullis. See enclosed map from which it appears that much of the tract is heavily wooded.




Developing this tract should also be sufficiently protective of the Edwards Aquifer and karst features which may be inhabited by endangered species. These species are indicator species for the health of the aquifer. This tract is within the Edwards Aquifer Contribution Zone. The Draft Bexar County Karst Invertebrates Recovery Plan (US Fish & Wildlife Service, March 2008) discusses karst zones. This tract is mostly in karst zone 2. Zone 2 areas have a high probability of containing habitat suitable for listed invertebrate karst species. If much of the areas identified by USFWS in this Recovery Plan for Bexar County are developed, then further restrictions may be placed on Camp Bullis' caves and karst features in order for the region to still meet species recovery goals. Thus karst issues off-post may affect training restrictions on-post. See enclosed map from which it appears that the majority of the tract is in karst zone 2.

Our concerns on compatibility with Camp Bullis will be addressed as long as the developer: 1) commits to incorporate dark sky lighting measures (such as the July 22nd, 2008 Bexar County light order or proposed City of San Antonio equivalent); 2) has appropriate documentation – recent surveys (not older than 3 years) conducted by a professional biological consultant IAW USFWS protocols showing that no endangered species are present and sends the surveys to USFWS Ecological Services Office in Austin.

My points of contact are Mr. Phil Reidinger at (210) 221-1099 or 336-0449 (cell) or Mr. Jim Cannizzo at (210) 295-9830.

Sincerely,

for -Deputy
Mary E. Garr
Colonel, US Army
Garrison Commander

Enclosures