



**THE ADJUTANT GENERAL'S DEPARTMENT
RAVENNA TRAINING AND LOGISTICS SITE**

1438 State Route 534 SW
Newton Falls, OH 44444

AGOH-RTLS-EN

27 March 2008

Dr. Mary Knapp
U.S. Fish and Wildlife Service
Ecological Services Division
6950 Americana Pkwy Suite H
Reynoldsburg, OH 43068-4127

**Subject: Intergovernmental and Interagency Environmental Planning Consultation
Ohio Army National Guard, Ravenna Training and Logistics Site
Supplemental Environmental Assessment of Range Development Plan**

Dear Dr. Knapp:

The Ohio Army National Guard (OHARNG) is preparing a Supplemental Environmental Assessment (SEA) for its updated Range Development Plan (RDP) for the Ravenna Training and Logistics Site (RTLS). This EA supplements the August 2004 *Final Environmental Assessment of Enhanced Training and Operations at the Ravenna Training and Logistics Site* (OHARNG 2004). A Finding of No Significant Impact (FNSI) for the 2004 Final EA was signed on 23 August 2004.

The RTLS is located in northeastern Ohio within Portage and Trumbull Counties, approximately 3 miles northeast of Ravenna, Ohio (see **Enclosure 1**). The RLTS consists of approximately 21,683 acres, 20,403 acres of which the OHARNG is responsible for managing. The updated RDP provides a prioritized plan for constructing and operating needed training ranges at RTLS. In addition to training and support facilities identified and addressed in the August 2004 Final EA and the 2007 SEA for an Engineer School at the RTLS, the RDP identifies 14 additional required training ranges at RTLS, listed below in general order of priority:

<u>Range</u>		<u>Range</u>	
OH-1	Demolition Range	OH-11	Modified Record Fire 2 / Zero Range 2
OH-2	Modified Record Fire 1/ Zero Range 1	OH-12	Multi-Purpose Machine Gun Range
OH-3	Combat Pistol / Military Police Qualification Course	OH-18	Modified Multipurpose Training Range Tank Table IV upgrade
OH-4	Hand Grenade Familiarization Range	OH-19	Firearems Training System Simulator Building
OH-8	Urban Assault Course	OH-20	Live Fire Breach Facility
OH-9	Modified Combined Arms Collective Training Facility	OH-21	Modified Live Fire Shoothouse with Zero Surface Danger Zone Shoothouse
OH-10	Grenade Launcher Range	OH-22	Fire & Movement Range

Range development is planned over the next 10 to 15 years. Funding is available to construct the demolition range (OH-1) in 2009, and two rifle ranges (OH-2) in 2010 or 2011. Construction dates for the other ranges are dependent upon funding but expected within the next 10 to 15 years. Range construction would be east of Greenleaf Road, south of Smalley Road and north of Newton Falls Road and between Wilcox-Wayland Road and George Road in the Group 4 area near Post 1 (main gate). **Enclosure 2** shows these general locations. The area shown does not correspond to the size of the disturbance but rather the general location of range development where specific smaller areas – the range footprints – will be disturbed.

All the ranges planned for the RTLS are small arms ranges (pistol, rifle, machinegun, non-explosive rounds) with the exception of the demolition range where explosive charges will be detonated within a contained detonation area. The 14 ranges, if not co-located, would occupy approximately 6,000 acres. Most of this land area would be needed for the Surface Danger Zones (SDZs)¹. However, by utilizing a common impact area and overlapping the SDZs, the required acreage to develop these 14 ranges is substantially reduced. The SDZs for the 14 proposed ranges would be fully contained within the RTLS boundaries. The OHARNG's preferred range configuration utilizes a combined impact area (overlapping SDZs) to minimize land area requirements and maximize the simultaneous use of ranges and other training assets (convoy routes and dismounted training adjacent to the range complex).

The actual disturbance area associated with the entire range development construction is expected to be less than 100 acres broken up into areas ranging from a couple acres up to 10 to 20 acres per range. Land within the SDZs would not be disturbed for range construction. Ground disturbance would occur within the range footprints, where firing points, targets and range support facilities are located. Range construction consists of clearing land, making general site improvements, extending utilities, improving roads, fencing, and building earthen target berms, firing positions, and range support facilities. Co-locating the ranges also saves on construction and operation costs by allowing some of the range support facilities (range tower, ammunition issue building, etc.) to be shared.

The most common charge planned for use at the demolition range is 0.25 pounds with occasional charges up to 40 pounds. The charge size and frequency of use is compatible to slightly less than what was used when the Ravenna Army Ammunition Plant was in operation. The demolition range will be used to support training of Combat Engineers and is expected to be used three to six times a year during the week and probably six to twelve times a year on weekends.

The OHARNG desires to minimize tree clearing and ground disturbance in all range construction as much as possible because of the expensive and potential negative environmental impacts. The preferred range configuration utilizes previously disturbed areas as much as possible and is located within the central portion of the RTLS to minimize off-site noise. For ranges such as the Modified Record Fire, Zero, and Combat Pistol Qualification, trees must be cleared. For other ranges only some trees need to be cleared.

The existing Natural Resources Management program at the RTLS will not be impacted by range development. Where practical the target areas of new ranges will be managed as grasslands. The forested areas within ranges and SDZs will continue to be managed under the forest management

¹ An SDZ is a mathematically predicted area that a projectile will impact upon return to earth, either by direct fire or ricochet. The SDZ is the area extending from a firing point to a distance downrange based on the projectiles fired and weapon system used. It is sized so that the probability of a projectile fragment escaping the SDZ is one in a million or less.

program. Flora and fauna surveys, wildlife management, and rare species management will continue as described in the RTLS Integrated Natural Resources Management Plan (INRMP).

The OHARNG has conducted a number of natural resources surveys at RTLS over the last several years and has extensive baseline information about on-site natural resources. **No federally listed species are known to reside at the RTLS, and no critical habitat occurs.**

Federally listed species with known occurrences in Portage and Trumbull Counties, Ohio include the threatened northern monkshood (*Aconitum noveboracense*), the endangered Mitchell's satyr butterfly (*Neonympha mitchellii mitchellii*), the endangered clubshell (*Pleurobema clava*), the endangered Indiana bat (*Myotis sodalis*), and the candidate eastern massasauga (*Sistrurus catenatus catenatus*).

- **Northern monkshood** – In correspondence dated 25 August 2005 (**Enclosure 3**), the USFWS indicated the RTLS does not contain suitable habitat for the northern monkshood and it has not been found on site in either of two site-wide vascular plant inventories conducted in 1993 and 2000. Therefore the proposed action will have no effect on the northern monkshood.
- **Mitchell's satyr butterfly** – Three lepidoptera surveys have been conducted at the RTLS (Rings & Downer, 1993; Rings, 1994; Gilligan, 1999; BHE Environmental, 2006). The preferred habitat for this species is sedge dominated fens with low shrubs and tamaracks. There is some limited sedge dominated fens/wetland habitat with low shrubs at the RTLS but none with tamaracks. The only tamaracks at the RTLS are associated with an old home site. This type of habitat will not be disturbed by the proposed range development. The RTLS does have potential habitat for the Mitchell's satyr butterfly but since the habitat will not be disturbed and since, even with extensive survey effort, the butterfly has not been identified on the training site it is the conclusion of the OHARNG that the proposed range development will have no effect on the Mitchell's satyr butterfly.
- **Clubshell Mussel** – In the above referenced correspondence dated 25 August 2005, the USFWS indicated that the presence of the clubshell mussel at RTLS is unlikely. This opinion has been confirmed by two survey attempts (1993 and 2000) to try and find the clubshell mussel on the RTLS property, with no clubshell mussels found. The proposed range development will not impact or disturb potential clubshell mussel habitat. Due to the lack of the species presence and non-disturbance of potential habitat it is the conclusion of the OHARNG that the proposed range development will have no effect on the clubshell mussel.
- **Indiana Bat** – In accordance with the RTLS INRMP, an installation-wide survey for the Indiana bat is conducted approximately every 5 years, in coordination with USFWS. Three Indiana bat surveys have been conducted at RTLS (Tawse, 1999; Davey Resource Group, 2002; Duffey & Brack, 2005). Netting efforts to date have provided no evidence of Indiana bats at RTLS. Potential habitat for the Indiana bat is evaluated and managed as part of the ongoing sustainable forest management program at RTLS. Discussions have been held with the USFWS concerning the difficulty of conducting effective Indiana Bat surveys at the RTLS within the limits of specific project or timber sale boundaries. It was agreed that installation-wide bat surveys every five years would be sufficient for determining the presence of the Indiana bat at the RTLS. Since the Indiana bat has not been found at the RTLS, there is currently no mandatory restriction on when trees can be cut. Even so, as a way to protect bats that may have gone undetected, the OHARNG follows recommended time restrictions on tree cutting when possible, particularly in areas considered as high

quality bat habitat. Based on failure to find the Indian bat on the RTLS property, and on the ongoing cooperative relationship between the USFWS and the OHARNG in implementing the Indiana bat management recommendation in the RTLS INRMP, it is the conclusion of the OHARNG that the proposed range development will have no effect on the Indian bat.

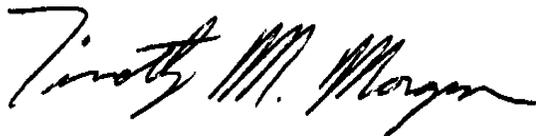
- **Eastern Massasauga** – Herptile inventories, in accordance with the RTLS INRMP, are on an approximate five-year cycle. Three surveys have been conducted (Schneider, 1993; Pfungsten, 2000; BHE Environmental, 2006). The RTLS contains suitable habitat for the massasauga, but this rattlesnake has not been observed at the RTLS to date. Due to the lack of the species presence on the RTLS property it is the conclusion of the OHARNG that the proposed range development will have no effect on the eastern massasauga.

The bald eagle (*Haliaeetus leucocephalus*), recently delisted, has been identified as an occasional migrant at RTLS. There are no bald eagle nests within the RTLS property or within 0.5 miles of the RTLS property. The proposed range development project will have no effect on the bald eagle.

We request that you review our findings and determinations of no effect and provide your concurrence if you agree. If there is anything we need to do to facilitate our range development without negatively impacting federally listed species or critical habitat that is not mentioned in this letter or the RTLS INRMP, please let us know. We are aware that the range projects are planned over a 10 to 15 year time horizon and that species listings may change within that time. Our immediate concern is for the projects planned in 2009 and 2010/2011. The RTLS INRMP will remain in effect during the entire range development process and out-year projects will require review and possible adjustment to account for any new species discoveries or listings that may occur. This is true not only for range development but for all operations at the RTLS and will be facilitated through INRMP implementation and annual coordination with your agency.

Thank you for your time and assistance. If you need more information or have questions, please contact me by phone at 614-336-6568 or by email at timothy.m.morgan@us.army.mil.

Sincerely,



Timothy M. Morgan, CF
Environmental Supervisor
Ravenna Training and Logistics Site

Enclosure 1: Location Map
Enclosure 2: Project Footprint Map
Enclosure 2: USFWS 25 August 2005 Letter

Cc: file
Rebecca Sabraoui, AMEC Earth & Environmental, Inc.
CPT Jill McLoughlin, Ohio Army National Guard



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May 6, 2008

Mr. Timothy Morgan
The Adjutant General's Department
Ravenna Training And Logistics Site
1438 State Route 534 SW
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Dear Mr. Morgan:

This is in response to your March 27, 2008 letter regarding the proposed Supplemental Environmental Assessment for Range Development Plans at the Ohio Army National Guard Ravenna Training and Logistics Site (RTLS), Portage and Trumbull Counties, Ohio. The project involves the development of a series of training ranges over the next 10-15 years on approximately 100 acres of the site. Some of the development will occur in maintained areas, while other development may occur in forested areas.

The Service has no objection to the proposed activities.

ENDANGERED SPECIES COMMENTS: As detailed in your letter, the Service and RTLS have a history of close coordination relative to federally- listed threatened and endangered species and high quality habitats. RTLS has been extensively surveyed for all listed species known or likely to occur in Portage and Trumbull Counties, and none of these species have been detected. Therefore, based on current survey records, we agree with your determination that the project will have no effect on federally-listed species.

This precludes the need for further action on this project as required by the 1973 Endangered Species Act, as amended. Also as noted in your letter, should future surveys indicate that listed species occur on the RTLS, further consultation with this office is warranted. Should, during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be reinitiated to assess whether the determinations are still valid.

If you have questions, or if we may be of further assistance in this matter, please contact Megan Seymour at extension 16 in this office.

Sincerely,

Mary Knapp, Ph.D.
Supervisor

cc: ODNR, DOW, SCEA Unit, Columbus, OH