

**IOWA ARMY AMMUNITION PLANT
INTEGRATED NATURAL RESOURCES
MANAGEMENT PLAN AND
CATEGORICAL EXCLUSION
2018-2023**

INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN AND CATEGORICAL EXCLUSION

Iowa Army Ammunition Plant

APPROVAL

This Integrated Natural Resources Management Plan meets requirements of the Sikes Act (16 USC 670a *et seq.*) as amended¹.

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¹ Signatures are digital copies of originals on file at Iowa Army Ammunition Plant.

INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN AND CATEGORICAL EXCLUSION

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PREFACE

Integrated management plans for natural and cultural resources provide resource managers with the "how to" and the justification to carry out Department of Defense's conservation goals. Integrated Natural Resource Management Plans support the military mission by providing for sustained use of its land, sea, and air space; protecting valuable natural and cultural resources for future generations; meeting all legal requirements; and promoting compatible multiple uses of those resources.

Ms. Sherri Goodman

Former Deputy Under Secretary of Defense (Environmental Security)

Iowa Army Ammunition Plant... a critical Department of Defense munitions production and storage facility.

Producing and storing the munitions troops need to win on battlefields around the globe and conserving natural resources . . . Iowa Army Ammunition Plant is proving that the two missions are compatible and even complement each other.

For more than 70 years, the Iowa Army Ammunition Plant (IAAAP, the Plant, or the installation) has supported the U.S. Armed Forces. The installation has risen to the needs of the nation in times of peace and war, and the workforce and surrounding community have tremendous pride in the Plant's role in support of the nation's defense. The logistical support provided by the installation is first-rate today, just as it was when our troops needed ammunition on the Normandy beachhead, the Inchon landing, the Afghanistan Mountains, the Persian Gulf desert, and other battlefields across the globe.

Iowa Army Ammunition Plant's lands and natural resources are important to the military mission and to the region as a whole. A stewardship responsibility came with the acquisition of these lands. Iowa Army Ammunition Plant is committed to excelling in this stewardship role. This Integrated Natural Resources Management Plan is the Plant's plan of action for the conservation of natural resources entrusted to the U.S. Army.

The plan is for a 5-year period, but the philosophy behind this plan is for a much longer period of time. Iowa Army Ammunition Plant is committed to an ecosystem management approach to its natural resources program. This approach will help protect biological diversity and allow informed decisions to be made regarding the use of natural resources to support both the military mission and needs of the region and the nation.

INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT

IOWA ARMY AMMUNITION PLANT

TABLE OF CONTENTS

EXECUTIVE REPORT	1
Purpose	1
Environmental Compliance	1
Scope	3
Relationship to the Military Mission	3
Partnerships	4
INRMP Implementation Summary	4
Costs and Benefits	4
INRMP Organization	4
Monitoring INRMP Implementation	5
NEPA Findings and Conclusions	5
Summary	5
1.0 POLICY, COMPLIANCE, AND NEPA INTEGRATION	7
1.1 Natural Resources Mission, Goals, and Objectives	8
1.2 Support of Installation Goals	9
1.3 Compliance Requirements	9
1.3.1 Sikes Act	9
1.3.2 National Environmental Policy Act	10
1.3.3 Migratory Bird Legal Instrumentalities	11
1.3.4 Endangered Species Act	14
1.3.5 Army Regulations	14
1.3.6 List of Laws and Regulatory Instruments	15
1.4 Biodiversity Conservation and Ecosystem Management	15
1.5 INRMP and NEPA Integration	16
1.5.1 Purpose, Need, and Rationale	16
1.5.2 Scope	16
1.5.3 Impact Analysis	17
1.5.4 Alternatives	17
1.5.4.1 Preferred Alternative: 2018-2023 INRMP Implementation (Proposed Management)	17
1.5.4.2 No Action Alternative: Continue Existing Management	18
1.5.4.3 Alternatives Considered but Eliminated	18
1.5.4.4 Alternatives Summary	19
1.5.5 Issues Not Considered to be Potentially Significant	19
1.5.6 Interagency Coordination and Public Review	21
2.0 RESPONSIBLE AND INTERESTED PARTIES	23
2.1 Iowa Army Ammunition Plant	23
2.1.1 Commanding Officer	23
2.1.2 Contract Administration Division	24

2.1.3 Operations Support Division	25
2.1.4 Other Installation Organizations	25
2.2 Other Defense Organizations.....	25
2.2.1 Northeast Region Installation Management Command	25
2.2.2 Army Environmental Command	25
2.2.3 Joint Munitions Command	25
2.2.4 U.S. Army Corps of Engineers.....	26
2.3 Other Federal Agencies	26
2.3.1 U.S. Fish and Wildlife Service.....	26
2.3.2 U.S. Department of Agriculture	26
2.4 Iowa Department of Natural Resources.....	26
2.5 American Indian Tribes	26
2.6 Universities.....	26
2.7 Municipalities	27
2.8 Contractors.....	27
3.0 AFFECTED ENVIRONMENT	29
3.1 General Background	29
3.1.1 Location.....	29
3.1.2 Neighbors	29
3.1.3 Acreage and Acquisition	29
3.1.4 Installation History	29
3.1.5 Military Mission.....	31
3.1.5.1 Mission of IAAAP	31
3.1.5.2 IAAAP Population and Tenants.....	31
3.1.5.3 Natural Resources Needed to Support the Military Mission	31
3.1.5.4 Effects of the Military Mission on Natural Resources.....	32
3.1.5.5 Effects of Natural Resources or Their Management on the Military Mission	34
3.2 Physical Environment and Climate	35
3.2.1 Physiography and Topography.....	35
3.2.2 Geology	35
3.2.3 Petroleum and Mineral Resources.....	35
3.2.4 Soils.....	35
3.2.5 Water Resources.....	36
3.2.5.1 Surface Water.....	36
3.2.5.2 Floodplains.....	38
3.2.5.3 Groundwater	38
3.2.6 Climate	38
3.2.6.1 Climate Change.....	39
Precipitation.....	39
Higher Temperatures	40
Agricultural Challenges.....	41
Habitat Changes.....	42
Greenhouse Gases	43
Agriculture	44
Comparison with U.S. Emissions	45
3.2.6.2 DoD Process to Address Climate Change.....	45
3.3 Biological Resources	46
3.3.1 Ecoregion	46
3.3.2 Flora	47

3.3.2.1 Vegetation Types	47
3.3.2.2 Floral Inventory	47
3.3.2.3 Special Status Flora.....	48
3.3.2.4 Areas of Special Interest	48
3.3.2.5 Wetlands	48
3.3.3 Fauna	49
3.3.3.1 General.....	49
3.3.3.2 Special Status Fauna	50
3.4 Human Environment.....	51
3.4.1 Cultural Resources	51
3.4.1.1 Cultural Resources Inventory.....	51
3.4.1.2 National Register of Historic Places Eligibility	52
3.4.2 Land Uses.....	52
3.4.3 Facilities and Utilities.....	53
3.4.3.1 Overview.....	53
3.4.3.2 Transportation System	53
3.4.3.3 Water Supply	55
3.4.3.4 Waste Water System	55
3.4.3.5 Range Facilities.....	55
3.4.3.6 Projected Changes to Facilities.....	55
3.4.4 Hazardous and Toxic Materials.....	55
3.4.5 Outdoor Recreation	56
4.0 NATURAL RESOURCES MANAGEMENT	58
4.1 History of Natural Resources Management.....	58
4.2 Ecosystem Management Coordination and Planning	58
4.2.1 Ecosystem Management Coordination.....	58
4.2.1.1 Current Management	58
4.2.1.2 Proposed Management.....	59
4.2.2 Integrated Natural Resources Management Planning	59
4.2.2.1 Current Management	59
4.2.2.2 Proposed Management.....	59
4.3 Soils Management	60
4.3.1 Current Management.....	60
4.3.2 Proposed Management	61
4.4 Water Resources Management	62
4.4.1 Current Management.....	62
4.4.2 Proposed Management	63
4.5 Forest Management	63
4.5.1 Current Management.....	64
4.5.2 Proposed Management	65
4.6 Habitat Management.....	65
4.6.1 Current Management.....	65
4.6.1.1 Inventory and Monitoring	65
4.6.1.2 Wetland Management	66
4.6.1.3 Terrestrial Habitat Management	67
4.6.1.4 Aquatic Habitat Management	68
4.6.2 Proposed Management	69
4.7 Fish and Wildlife Management	70
4.7.1 Current Management.....	71

4.7.1.1 Inventory and Monitoring	71
4.7.1.2 Fish and Wildlife Population Management	73
4.7.2 Proposed Management	78
4.8 Rare and Listed Species Management.....	79
4.8.1 Federally-listed Species Management Practices	79
4.8.1.1 Current Management	81
4.8.1.2 Proposed Management.....	83
4.8.2 Other Special Status Species Management	83
4.8.2.1 Current Management	84
4.8.2.2 Proposed Management.....	84
4.9 Special Interest Areas Management	84
4.9.1 Current Management.....	84
4.9.2 Proposed Management	85
4.10 Agricultural Outleashes	85
4.10.1 Current Management.....	85
4.10.2 Proposed Management	88
4.11 Pest Management.....	88
4.11.1 Current Management.....	88
4.11.2 Proposed Management	91
4.12 Cantonment Area Management	91
4.12.1 Current Management.....	91
4.12.2 Proposed Management	91
4.13 Fire Management.....	92
4.13.1 Current Management.....	92
4.13.1.1 Integrated Wildland Fire Management Plan	92
4.13.1.2 Wildfire Management	93
4.13.1.3 Prescribed Burning.....	93
4.13.2 Proposed Management	94
4.14 Outdoor Recreation.....	95
4.14.1 General	95
4.14.2 Hunting, Fishing, and Trapping	96
4.14.2.1 Current Management	96
4.14.2.2 Proposed Management.....	99
5.0 Natural Resources-related Programs.....	101
5.1 Natural Resources Enforcement	101
5.1.1 Current Management.....	102
5.1.2 Proposed Management	103
5.2 Conservation Awareness	103
5.2.1 Current Management.....	103
5.2.2 Proposed Management	104
5.3 Cultural Resources Protection	104
5.3.1 Current Management.....	104
5.3.1.1 General.....	104
5.3.1.2 Cultural Resources Inventory.....	104
5.3.1.3 American Indian Tribe Consultation and Coordination.....	104
5.3.1.4 Natural Resources Management Implications	105
5.3.2 Proposed Management	106
5.4 National Environmental Policy Act Implementation.....	107
5.4.1 General	107

5.4.2 NEPA and Natural Resources Management.....	108
5.4.2.1 Current Management	108
5.4.2.2 Proposed Management.....	109
6.0 UNRESOLVED ISSUES	111
7.0 IMPLEMENTATION	113
7.1 Organization	113
7.2 Personnel	113
7.2.1 INRMP Implementation Staffing and Training.....	113
7.2.1.1 Current Management	113
7.2.1.2 Proposed Management.....	114
7.2.2 External Assistance	114
7.2.2.1 Current Management	114
7.2.2.2 Proposed Management.....	115
7.3 Data Storage, Retrieval, and Analysis	115
7.3.1 Current Management.....	116
7.3.2 Proposed Management	116
7.4 Project/Program Summary	117
7.5 Implementation Funding Options.....	117
7.5.1 Forestry Funds.....	117
7.5.2 Sikes Act Funds.....	117
7.5.3 Agricultural Funds.....	117
7.5.4 Environmental Funds	118
7.5.5 Other Funding	119
7.6 INRMP Implementation Costs	119
7.7 Command Support.....	119
8.0 ENVIRONMENTAL CONSEQUENCES AND CONCLUSIONS	121
8.1 Impacts Common to Both Alternatives	121
8.2 Environmental Consequences Analyses.....	121
8.2.1 Soils.....	121
8.2.2 Water Resources.....	122
8.2.3 Air Quality.....	123
8.2.4 Flora	123
8.2.5 Fauna	124
8.2.6 Cultural Resources	125
8.2.7 Outdoor Recreation	125
8.2.8 Summary	125
8.3 Cumulative Effects	126
8.4 Summary of Potential Environmental Consequences.....	127
8.5 Conclusions	127
8.5.1 INRMP Summary.....	127
8.5.2 NEPA Findings and Conclusions	128
REFERENCES.....	130
AGENCIES AND PERSONS CONTACTED	133
PLAN PREPARERS.....	133
DISTRIBUTION LIST	135
ACRONYMS	135
APPENDICES	137
Appendix 1.3.6 Regulatory Instruments that May Affect Natural Resources Management on Iowa Army Ammunition Plant	139

Appendix 1.5.6 INRMP/Categorical Exclusion Correspondence.....	141
Appendix 2.3.1 Items of Cooperation Among the U.S. Fish and Wildlife Service, Iowa Department of Natural Resources, and Iowa Army Ammunition Plant, Iowa	152
Appendix 3.4.1.1 Program Comment for World War II and Cold War Era (1939 -1974) Army Ammunition Production Facilities and Plants; and Program Comment for World War II and Cold War Era (1939 - 1974) Ammunition Storage Facilities	155
Appendix 4.3 Soil Erosion and Sediment Control Component.....	167
Appendix 4.8.1.1 Management Prescriptions and Implementation Portions of the Endangered Species Management Plan, Iowa Army Ammunition Plant, Iowa	169
Appendix 4.10.1 Land Use Regulations, Iowa Army Ammunition Plant, Iowa	171
Appendix 4.13.1.1 Integrated Wildland Fire Management Plan, Iowa Army Ammunition Plant, Iowa	180
Appendix 7.4 List of INRMP Goals and Objectives	184
Appendix 8.5.2 Finding of No Significant Impact (2013).....	194

TABLES

Table 3.2.6 Summary of Middletown, Iowa Climate Data.....	39
Table 3.4.2 IAAAP Land Use Categories and Acreage	52
Table 7.5.3 Agricultural Funds Projects	118
Table 7.6 INRMP Implementation Costs	119
Table 8.4 Summary of Potential Environmental Consequences.....	127

FIGURES

Figure 3.1.1 Iowa Army Ammunition Plant Location.....	30
Figure 3.2.5.1 Iowa Army Ammunition Plant Surface Water Resources.....	37
Figure 3.4.2 Recreational Areas on Iowa Army Ammunition Plant	54
Figure 4.10.1 Land Leases on Iowa Army Ammunition Plant.....	86

EXECUTIVE REPORT

*It is our obligation to ensure that our Soldiers today – and the Soldiers of the future – have the land, water, and air resources they need to train; a healthy environment in which to live; and the support of local communities and the American people.*⁵

Purpose

This Integrated Natural Resources Management Plan (INRMP) guides implementation of the natural resources program at the Iowa Army Ammunition Plant (IAAAP), Middletown, Iowa from 2018⁶ through 2023. The program conserves IAAAP's land and natural resources and helps ensure compliance with environmental laws and regulations. The INRMP also helps ensure the maintenance of quality lands to accomplish IAAAP's critical military mission on a sustained basis.

Environmental Compliance

General

Preparation and implementation of this INRMP are required by the Sikes Act (16 United States Code (USC) 670 *et seq.*), Army Regulation (AR) 200-1 (*Environmental Protection and Enhancement*) (Department of the Army 2007), and Army Memorandum (May 25, 2006), *Guidance for Implementation of the Sikes Act Improvement Act* (Department of the Army 2006). Additional INRMP guidance is provided by Department of Defense (DoD) Instruction 4715.03 (March 18, 2011), *Natural Resources Conservation Program* (Department of Defense 2011).

This INRMP helps IAAAP comply with other federal and state laws, most notably laws associated with environmental documentation, wetlands, federally-listed species, migratory birds, and wildlife management in general. Compliance requirements at least partially affecting implementation of the INRMP are listed in Section 1.3, *Compliance Requirements* and Appendix 1.3.6, *Regulatory Instruments that May Affect Natural Resources Management on Iowa Army Ammunition Plant*. This plan describes how IAAAP will implement provisions of AR 200-1 (Department of the Army 2007) and local regulations, principally IAAAP Regulation 420-1 (*Hunting and Fishing Regulation*).

National Environmental Policy Act

The National Environmental Policy Act (NEPA) requires disclosure of environmental impacts created by proposed major federal actions. 32 Code of Federal Regulations (CFR) Part 651 (*Environmental Analysis of Army Actions, Federal Register Vol. 67, No. 61, March 29, 2002*) and the Council on Environmental Quality (CEQ) (*Implementing Guidelines for NEPA*, 40 CFR Parts 1500-1508) recommend an Environmental Assessment (EA) be completed for natural resources management plans.

Per Army Memorandum (May 25, 2006), *Guidance for Implementation of the Sikes Act Improvement Act* (Department of the Army 2006), IAAAP is not required to prepare an EA for this revision of the INRMP since *these revisions are not expected to result in biophysical consequences materially different from those anticipated in the existing INRMP and materially different from those analyzed in an existing NEPA document, then neither additional NEPA analysis nor an opportunity for public comment should be necessary*. The existing INRMP (IAAAP 2013) has an incorporated EA, and this revision meets above

⁵ Robert J. Schoomaker, U.S. Army Chief of Staff, and R.L. Brownlee, Acting Secretary of the Army. Excerpt from *The Army Strategy for the Environment*, "Sustain the Mission – Secure the Future"

⁶ Date of final approval signature through that same date in 2023.

requirements. As such, this revision of the IAAAP INRMP qualifies for 32 CFR Part 651, Appendix B - CX(b)(3) coverage by meeting the following parameters:

(b) Administration/operation activities:

(3) Preparation of regulations, procedures, manuals, and other guidance documents that implement, without substantive change, the applicable HQDA or other federal agency regulations, procedures, manuals, and other guidance documents that have been environmentally evaluated (subject to previous NEPA review).

A CX (Categorical Exclusion) is ‘a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect in procedures adopted by a Federal agency in implementation of these regulations (§1507.3) and for which, therefore, neither an environmental assessment nor an environmental impact statement is required (CEQ 2010).’ A CX is not an exemption or waiver of NEPA review; it is simply one type of NEPA review. Once established, categorical exclusions provide an efficient tool to complete the NEPA environmental review process for proposals that normally do not require more resource-intensive EAs or EISs.

Recognizing the efficiencies and benefits associated by combining the INRMP and its associated NEPA review into one document, this plan was developed to satisfy both requirements. However, the IAAAP also recognizes the importance of a thorough environmental review and analysis of its actions. As such, even though this plan qualifies for the CX, the previous EA has been updated and analyzed to ensure the best available science is being implemented and to ensure compliance. The INRMP has been reorganized from the Army Guidelines to accommodate NEPA documentation within the plan.

IAW Appendix B (b) (3) of 32 CFR 651.33 and the screening criteria of the same, this action is categorically excluded (CX). The Environmental Assessment conducted for the 2013 *Iowa Army Ammunition Plant, Integrated Natural Resources Management Plan and Environmental Assessment; 2013-2018* was consulted and no significant changes occurred, therefore satisfying the requirements of the CX.

Sikes Act

The Sikes Act⁷ states, *The Secretary of Defense shall carry out a program to provide for the conservation and rehabilitation of natural resources on military installations. To facilitate the program, the Secretary of each military department shall prepare and implement an integrated natural resources management plan for each military installation.*

The Sikes Act (16 USC 670 *et seq.*) requires that, consistent with the use of military installations to ensure the preparedness of the Armed Forces, each INRMP shall, where appropriate and applicable, provide for:

- fish and wildlife management, land management, forest management, and fish and wildlife-oriented recreation;
- fish and wildlife habitat enhancement or modifications;
- wetland protection, enhancement, and restoration where necessary for support of fish or wildlife;
- integration of, and consistency among, the various activities conducted under the INRMP;
- establishment of specific natural resources management objectives and time frames for proposed actions;

⁷ The Sikes Act referenced in this INRMP is as amended, including Public Law 105-85, the Sikes Act Improvement Act of 1997.

- sustained use by the public of natural resources to the extent such use is not inconsistent with the needs of fish and wildlife resources management;
- public access to the military installation that is necessary or appropriate for sustained use by the public of natural resources to the extent that the use is not inconsistent with the needs of fish and wildlife resources, subject to requirements necessary to ensure safety and military security;
- enforcement of natural resource laws and regulations;
- no net loss in the capability of military installation lands to support the military mission of the installation; and
- such other activities as the Secretary of the military department considers appropriate.

The Sikes Act also requires or provides for:

- regular review of this INRMP and its effects, not less often than every five years;
- provisions for spending hunting and fishing permit fees exclusively for the protection, conservation, and management of fish and wildlife, including habitat improvement and related activities in accordance with the INRMP;
- exemption from procurement of services under Office of Management and Budget Circular A-76 and any of its successor circulars; and
- priority for contracts involving implementation of this INRMP to state and federal agencies having responsibility for conservation of fish or wildlife.

This INRMP includes these items if they are applicable to natural resources management and land use at IAAAP. Additional Sikes Act wildlife enforcement requirements are described in Section 5.1, *Natural Resources Enforcement*.

Endangered Species Act

The signatory approval of this INRMP by the United States (U.S.) Fish and Wildlife Service (USFWS) indicates USFWS overall approval of the plan and its concurrence that implementation of the plan will promote the conservation of listed species and is not likely to adversely affect listed species. Review of the INRMP is informal consultation with regard to the Endangered Species Act.

Per provisions of the 2004 National Defense Authorization Act⁸, this INRMP *provides a benefit to the species for which critical habitat is proposed for designation*. USFWS policy states that, where applicable, federal critical habitat designation is not warranted if the INRMP includes certain criteria, which are summarized in Section 4.8.1.1, *Critical Habitat*.

Scope

The INRMP will provide the basis and criteria for protecting and enhancing natural resources using landscape and ecosystem perspectives, consistent with the military mission. The INRMP applies to organizations internal and external to IAAAP that are involved with or interested in the management or use of IAAAP natural resources and lands.

Relationship to the Military Mission

This INRMP supports the military mission by protecting and enhancing lands upon which the mission is critically dependent. The INRMP also describes recreational opportunities associated with natural resources to IAAAP and local and regional communities.

⁸ Section 318, Military Readiness and Conservation of Protected Species, National Defense Authorization Act of 2004.

The INRMP describes the effects of the military mission on natural resources and means to mitigate these effects. However, this INRMP does not evaluate IAAAP's military mission, nor does it replace any requirement for environmental documentation of the military mission at IAAAP.

Partnerships

This INRMP cannot be implemented by IAAAP alone. IAAAP has forged partnerships with various agencies to manage its natural resources. Major partners in the implementation of this INRMP are the Iowa Department of Natural Resources (IDNR) and the USFWS. Other partners in this effort may include other federal and state agencies, universities, contractors, nongovernmental organizations, and private citizens.

INRMP Implementation Summary

This INRMP is designed to provide direct input into the budget process. The INRMP (chapters 4, 5, and 7) describes specific projects with justifications, timelines, and budgets. Each project with its goals and objectives and timelines are listed in Appendix 7.4, *List of INRMP Goals and Objectives*. Section 7.5, *Implementation Funding Options* lists each project by funding source and provides estimated costs to implement during fiscal years 2018-2023.

Costs and Benefits

- **Costs:** Full implementation of this INRMP will cost about \$6,282,000.00 for FY 18 - FY 23. Funding will be primarily from revenues generated from agricultural leases and the sale of hunting and fishing permits.
- **Military Mission Benefits:** Implementation of this INRMP will improve the quality of land and conditions for the production and storage of munitions at IAAAP. It will improve the capability for long range planning at IAAAP.
- **Environmental Benefits:** The INRMP provides the basis for the conservation and protection of natural resources. It will help reduce vegetation loss, soil erosion, and the potential for environmental pollution, while providing biodiversity conservation. Plan implementation will increase overall knowledge of the operation of IAAAP ecosystems through surveys and research.
- **Other Benefits:** Both community relations and IAAAP's environmental image, internal and external to Defense, will be enhanced. Quality of life for the IAAAP community and its neighbors will be improved. INRMP implementation will decrease long-term environmental costs and reduce personal and installation liabilities from environmental noncompliance.

INRMP Organization

This INRMP is organized in distinct categories.

- Chapter 1 describes general relationships between natural resources management and the overall IAAAP mission. It lists compliance requirements, describes the natural resources management philosophy as a whole, describes regional programs, and provides a summary of the NEPA process and CX portion of this INRMP.
- Chapter 2 identifies responsible parties and their roles in implementation of this INRMP.
- Chapter 3 describes the affected environment (physical, biological, and human) at IAAAP, including a description of the military mission and land management units.
- Chapter 4 describes natural resources programs within the responsibility of the Operations Support Division at IAAAP, using specific project descriptions.

- Chapter 5 describes programs directly related to natural resources, using specific project descriptions, some of which are under the responsibility of other IAAAP organizations.
- Chapter 6 identifies unresolved issues.
- Chapter 7 provides means used for implementing this INRMP, including organization, personnel, external assistance, data analysis, project summary, funding, and command support.
- Chapter 8 describes the overall environmental consequences of implementing this INRMP.
- **References** documents all sources referenced in this INRMP.
- **Agencies and Persons Consulted** identifies local, state, and federal agencies and individuals consulted by the preparers of this INRMP for their expertise.
- **Plan Preparers** identifies individuals, with their qualifications, who prepared this document.
- The **Distribution List** identifies all agencies, organizations, and individuals to who copies of this INRMP were sent.
- The **Acronyms** section lists all acronyms used and their meaning.
- **Appendices** contain information or data relevant to natural resources management on IAAAP.

For those who are primarily interested in natural resources projects planned for 2018-2023, they are described in chapters 4, 5, and 7; summarized for budget purposes in sections 7.5, *Implementation Funding Options* and 7.6, *INRMP Implementation Costs*; and summarized by project with abbreviated goals and objectives in Appendix 7.4, *List of INRMP Goals and Objectives*.

Monitoring INRMP Implementation

The INRMP will be evaluated through monitoring programs, including the Environmental Performance Assessment System (every three years), the Environmental Quality Report, and reviews by higher Commands and other interested parties. DoD Instruction 4715.03 (*Natural Resources Conservation Program*) requires that INRMPs are reviewed annually in cooperation with other internal and external parties. Annual reviews facilitate adaptive management by providing an opportunity for the parties to review the goals and objectives of the plan, as well as establish a realistic schedule for proposed actions. The list of INRMP goals and objectives in Appendix 7.4, *List of INRMP Goals and Objectives* can provide a basis for evaluating plan implementation.

NEPA Findings and Conclusions

Findings based on the incorporated and updated previous EA indicate that, under the Preferred Alternative (implementation of this INRMP), potential consequences would either have no significant adverse effects or beneficial effects on each resource area. The affected environment would not be significantly adversely affected by proceeding with the Preferred Alternative. No significant changes are proposed in this updated version of the INRMP. Therefore, this revision of the IAAAP INRMP qualifies for 32 CFR Part 651, Appendix B -CX(b)(3) and the preparation of an Environmental Impact Statement, EA, and Finding of No Significant Impact (FONSI) is not required.

Summary

The INRMP outlines steps required to meet DoD, U.S. Army, and IAAAP legal and moral obligations to provide for the stewardship of the natural resources on IAAAP, while enabling the accomplishment of the military mission. The INRMP has been developed through cooperation with appropriate regulatory agencies. As a public document, it will support and perpetuate the military mission while fostering stewardship and goodwill for IAAAP, the U.S. Army, and the DoD. This INRMP will not resolve all existing and/or future environmental issues. It does, however, provide the guiding strategy, personnel, and means to minimize and work toward resolution of such issues.

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1.0 POLICY, COMPLIANCE, AND NEPA INTEGRATION

The Army Strategy for the Environmental Vision⁹

Sustain the Mission – Although much is changing, certain things remain constant. The Army's primary mission is to defend the United States – its people, its land, and its heritage. Our core values endure.

Secure the Future - ... a sustainable Army simultaneously meets current as well as future mission requirements worldwide, safeguards human health, improves quality of life, and enhances the natural environment.

Meet the Challenges - ... we are transforming how we fight, how we train, how we do business, and how we interact with others in order to continually improve and provide for the Nation's security.

The Army Strategy for the Environmental Goals¹⁰

- Foster a Sustainability Ethic – Foster an ethic within the Army that takes us beyond environmental compliance to sustainability.
- Strengthen Army Operations – Strengthen Army operational capability by reducing our environmental footprint through more sustainable practices.
- Meet Test, Training and Mission Requirements – Meet current and future training, testing, and other mission requirements by sustaining land, air, and water resources.
- Minimize Impacts and Total Ownership Costs – Minimize impacts and total ownership costs of Army systems, materiel, facilities, and operations by integrating the principles and practices of sustainability.
- Enhance Well-being – Enhance the well-being of our soldiers, civilians, families, neighbors and communities through leadership in sustainability.
- Drive Innovation – Use innovative technology and the principles of sustainability to meet user needs and anticipate future Army challenges.

This Army commitment to natural resources management is described in Army Regulation (AR) 200-1 (Department of the Army 2007) and Army Memorandum (May 25, 2006), *Guidance for Implementation of the Sikes Act Improvement Act* (Department of the Army 2006), which require that Integrated Natural Resources Management Plans (INRMPs) be developed and maintained for Army installations, as well as establish policy, procedures, and responsibilities for Army lands and their natural resources.

⁹ *Sustain the Mission, Secure the Future – The Army Strategy for the Environment.*

¹⁰ *Sustain the Mission, Secure the Future – The Army Strategy for the Environment.*

1.1 Natural Resources Mission, Goals, and Objectives

Iowa Army Ammunition Plant Environmental Policy

The Iowa Army Ammunition Plant (IAAAP) is committed to protecting the environment by focusing on: methods to prevent pollution and waste; compliance to environmental regulations and other mandated or IAAAP requirements; conservation of natural resources; and continual improvement.

Natural Resources Mission

Provide professional management and stewardship of natural resources at Iowa Army Ammunition Plant to achieve optimum, sustainable use of Army lands, promote biodiversity and ecosystem functionality, provide opportunities for multiple compatible uses of natural resources, and comply with environmental laws.

IAAAP has developed the below natural resources goals and objectives to directly support goals within the Army Strategy for the Environment. These objectives and those more specific in chapters 4, 5, and 7 (as summarized in Appendix 7.4) serve as a checklist to monitor the success of the INRMP. Some objectives fit more than one category. When this occurs, the most-fitting category was chosen.

Goal 1. Provide quality natural resources as a critical asset upon which to accomplish the military mission of IAAAP.

Objective 1. Ensure no net loss in the capability of IAAAP lands to support existing and projected military operations.

Objective 2. Maintain quality lands through monitoring and damage avoidance, minimization, mitigation, and rehabilitation.

Goal 2. Comply with laws and regulations that pertain to management of IAAAP's natural resources.

Objective 1. Manage natural resources within the spirit and letter of environmental laws, particularly the Sikes Act upon which this INRMP is predicated.

Objective 2. Protect, restore, and manage sensitive species and wetlands.

Objective 3. Use procedures within the National Environmental Act (NEPA) to make informed decisions that include natural resources considerations and mitigation.

Objective 4. Ensure IAAAP's natural resources program is consistent with the protection of cultural and historic resources.

Objective 5. Implement this INRMP within the framework of Army policies and regulations.

Objective 6. Protect and manage threatened and endangered species and critical habitat in accordance with the Endangered Species Act (ESA), NEPA, AR 200-1, United States (U.S.) Fish and Wildlife Service (USFWS) regulations and agreements, and other applicable laws or guidance from higher headquarters.

Goal 3. Manage natural resources on IAAAP to assure good stewardship of public lands entrusted to the care of the Army.

Objective 1. Use adaptive ecosystem management strategies to protect, conserve, and enhance native fauna and flora with an emphasis on priority species and biodiversity enhancement.

Objective 2. Monitor and manage soils, water, vegetation, and wildlife on IAAAP with a consideration for all biological communities and human values associated with these resources.

Objective 3. Provide human-valued products of renewable natural resources when such products can be produced in a sustainable fashion without significant negative impacts on the military mission or other natural resources.

Objective 4. Provide professional enforcement of natural resources-related laws.

Objective 5. Involve the surrounding community in the IAAAP natural resources program.

Objective 6. Ensure the IAAAP natural resources program is coordinated with other agencies and conservation organizations with similar interests.

Goal 4. Improve the quality of life of the IAAAP community and general public through high quality natural resources-based recreational opportunities.

Objective 1. Provide high quality opportunities for hunting and fishing and other consumptive recreational activities within biological and recreational carrying capacities of the resources.

Objective 2. Provide conservation education opportunities.

The ability to achieve these goals, including direct support of the military mission, depends directly on the health and condition of natural resources at IAAAP. Properly functioning ecological conditions at the Plant provide the vegetation, soil, and water resources needed to support military operations. These same conditions provide opportunities for outdoor recreation that are important assets to both military and civilian communities associated with IAAAP.

1.2 Support of Installation Goals

Implementation of this INRMP will support the mission of IAAAP. The natural resources staff at IAAAP is committed to supporting the military mission, providing stewardship of resources entrusted to the Army, enhancing the quality of life of the IAAAP and surrounding communities, and being a valued member of the overall IAAAP team. Implementation of this INRMP will demonstrate those qualities.

1.3 Compliance Requirements

The INRMP is the primary mechanism for compliance with natural resources laws and regulations. Federal, state, and local laws and regulations may apply to proposed management actions in this plan.

1.3.1 Sikes Act

The Sikes Act¹¹ states, *The Secretary of Defense shall carry out a program to provide for the conservation*

¹¹ The Sikes Act referenced in this INRMP is as amended, including Public Law 105-85, the Sikes Act Improvement Act of 1997.

and rehabilitation of natural resources on military installations. To facilitate the program, the Secretary of each military department shall prepare and implement an integrated natural resources management plan for each military installation.

The Sikes Act (16 USC 670 *et seq.*) requires that, consistent with the use of military installations to ensure the preparedness of the Armed Forces, each INRMP shall, where appropriate and applicable, provide for:

- fish and wildlife management, land management, forest management, and fish and wildlife-oriented recreation;
- fish and wildlife habitat enhancement or modifications;
- wetland protection, enhancement, and restoration where necessary for support of fish or wildlife;
- integration of, and consistency among, the various activities conducted under the INRMP;
- establishment of specific natural resources management objectives and time frames for proposed actions;
- sustained use by the public of natural resources to the extent such use is not inconsistent with the needs of fish and wildlife resources management;
- public access to the military installation that is necessary or appropriate for sustained use by the public of natural resources to the extent that the use is not inconsistent with the needs of fish and wildlife resources, subject to requirements necessary to ensure safety and military security;
- enforcement of natural resource laws and regulations;
- no net loss in the capability of military installation lands to support the military mission of the installation; and
- such other activities as the Secretary of the military department considers appropriate.

The Sikes Act also requires or provides for:

- regular review of this INRMP and its effects, not less often than every five years;
- provisions for spending hunting and fishing permit fees exclusively for the protection, conservation, and management of fish and wildlife, including habitat improvement and related activities in accordance with the INRMP;
- exemption from procurement of services under Office of Management and Budget Circular A-76 and any of its successor circulars; and
- priority for contracts involving implementation of this INRMP to state and federal agencies having responsibility for conservation of fish or wildlife.

Additional Sikes Act wildlife enforcement requirements are described in Section 5.1, *Natural Resources Enforcement*.

1.3.2 National Environmental Policy Act

The NEPA requires disclosure of environmental impacts created by proposed major federal actions. 32 CFR Part 651 (*Environmental Analysis of Army Actions, Federal Register Vol. 67, No. 61, March 29, 2002*) and the Council on Environmental Quality (*Implementing Guidelines for NEPA*, 40 CFR Parts 1500-1508) recommend an Environmental Assessment (EA) be completed for natural resources management plans.

Per Army Memorandum (May 25, 2006), *Guidance for Implementation of the Sikes Act Improvement Act* (Department of the Army 2006), IAAAP is not required to prepare an EA for this revision of the INRMP since *these revisions are not expected to result in biophysical consequences materially different from those anticipated in the existing INRMP and materially different from those analyzed in an existing NEPA*

document, then neither additional NEPA analysis nor an opportunity for public comment should be necessary. The existing INRMP (IAAAP 2013) has an incorporated EA, and this revision meets above requirements. As such, this revision of the IAAAP INRMP qualifies for 32 CFR Part 651, Appendix B - CX(b)(3) coverage by meeting the following parameters:

(b) Administration/operation activities:

(3) Preparation of regulations, procedures, manuals, and other guidance documents that implement, without substantive change, the applicable HQDA or other federal agency regulations, procedures, manuals, and other guidance documents that have been environmentally evaluated (subject to previous NEPA review).

A CX is ‘a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect in procedures adopted by a Federal agency in implementation of these regulations (§1507.3) and for which, therefore, neither an environmental assessment nor an environmental impact statement is required (CEQ 2010).’ A CX is not an exemption or waiver of NEPA review; it is simply one type of NEPA review. Once established, categorical exclusions provide an efficient tool to complete the NEPA environmental review process for proposals that normally do not require more resource-intensive EAs or EISs.

Recognizing the efficiencies and benefits associated by combining the INRMP and its associated NEPA review into one document, this plan was developed to satisfy both requirements. However, the IAAAP also recognizes the importance of a thorough environmental review and analysis of its actions. As such, even though this plan qualifies for the CX, the previous EA has been updated and analyzed to ensure the best available science is being implemented and to ensure NEPA compliance. The INRMP has been reorganized from the Army Guidelines to accommodate NEPA documentation within the plan.

IAW Appendix B (b) (3) of 32 CFR 651.33 and the screening criteria of the same, this action is categorically excluded (CX). The Environmental Assessment conducted for the 2013 *Iowa Army Ammunition Plant, Integrated Natural Resources Management Plan and Environmental Assessment; 2013-2018* was consulted and no significant changes occurred, therefore satisfying the requirements of the CX.

1.3.3 Migratory Bird Legal Instrumentalities

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) is an international agreement among the United States, Canada, and Mexico that protects designated species of birds. Most birds are protected under MBTA, with only a few exceptions. Birds classified as migratory also include species that occupy IAAAP throughout the year. A complete list of all species of all migratory birds protected by MBTA is in 50 CFR 10.13.

MBTA controls the taking of these birds, their nests, eggs, parts, or products. MBTA states that it is unlawful *at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, attempt to capture, or attempt to kill, purchase, offer to purchase, deliver for shipment, ship, export, import, cause to be shipped, deliver for transport, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export, possess, offer for sale, sell, offer to sell, barter, offer to barter, any migratory bird, any part, nest, or egg of any such bird, or any part, nest, or egg thereof;* unless and except as permitted by regulations in the MBTA.

All persons, organizations, and agencies, are liable for prosecution for violations and must follow permitting requirements for taking migratory birds. Special purpose permits may be requested and issued that allow for the relocation or transport of migratory birds for management purposes.

Executive Order 13186

Executive Order 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds* requires that the Department of Defense (DoD) and the USFWS establish a memorandum of understanding that will promote the conservation of migratory bird populations. A draft memorandum of understanding has been developed between the agencies. This document states that DoD will develop conservation measures to avoid or minimize take of migratory bird population and/or that will provide quality habitat to benefit migratory bird populations for non-military readiness activities. These conservation measures will include:

- habitat protection, restoration, and enhancement,
- fire and fuels management practices,
- invasive species management practices, communications towers, utilities, and energy development, and
- recreation and public use.

Specifically, the draft memorandum of understanding requires that DoD shall:

- follow all migratory bird permitting requirements for activities subject to 50 CFR;
- promote the inclusion of comprehensive migratory bird management objectives into installation INRMPs;
- avoid or minimize the unintentional take of migratory birds to the extent practicable; and
- prior to starting any activity that is likely to affect populations of migratory birds, take the following specific steps:
 - identify potentially affected species, especially species of concern;
 - use the NEPA to assess and document expected impacts on species of concern;
 - develop and strive to implement conservation measures to avoid or minimize unintentional take with an emphasis of species of concern;
 - provide to the USFWS any NEPA documentation showing significant impacts to a migratory bird species population;
 - retain records of DoD actions and conservation measures to be implemented;
 - strive to ensure that plans (*e.g.*, INRMPs) promote programs and recommendations of comprehensive planning efforts for migratory birds (*e.g.*, Partners in Flight, U.S. Shorebird Conservation Plan);
 - implement new and/or existing inventory and monitoring programs to evaluate the effectiveness of conservation measures to minimize or mitigate take of migratory birds;
 - prevent or abate, to the extent practicable and appropriate, the pollution or detrimental alteration of environments used by migratory birds;
 - periodically evaluate and, if necessary, confer with the USFWS on revisions to conservation measures taken to avoid or minimize unintentional take of migratory birds; and
 - advise the public of the availability of the memorandum of understanding, through a notice published in the Federal Register.

Migratory Bird Permits; Take of Migratory Birds by the Armed Forces

The USFWS published a final rule (Federal Register Volume 72, Number 39, February 28, 2007) that authorizes the Armed Forces for the incidental taking of migratory birds during military readiness activities. This final rule ... *authorizes such take, with limitations, that result from military readiness activities of the Armed Forces. If any of the Armed Forces determine that a proposed or an ongoing military readiness activity may result in a significant adverse effect on a population of a migratory bird species, then they must confer and cooperate with the Service to develop appropriate and reasonable conservation measures to minimize or mitigate identified significant adverse effects. The Secretary of the Interior, or his/her designee, will retain the power to withdraw or suspend the authorization for particular activities in appropriate circumstances.*

This rule only includes military readiness activities. It specifically does not include routine operation of installation operating support functions (e.g., administrative offices; military exchanges; commissaries; water treatment facilities; storage facilities; schools; housing; motor pools; laundries; morale, welfare, and recreation activities; shops; mess halls), operation of industrial activities, or construction or demolition of facilities relating to these routine operations.

The rule anticipates that installations will use the NEPA process to determine whether an ongoing or proposed military readiness activity is *likely to result in a significant adverse effect on the population of a migratory bird species*. If such significant adverse effects are likely, an installation is required to confer with the USFWS to develop and implement appropriate conservation measures to minimize or mitigate any such significant adverse effects. The Armed Forces will continue to be responsible for ensuring that military readiness activities are implemented in accordance with all applicable statutes including the NEPA and ESA.

Withdrawal of authorization may be proposed if the Secretary [*of Interior*] determines that failure to do so is likely to result in a significant adverse effect on a population of a migratory bird species and one or more of the following circumstances apply:

- (A) The Armed Forces have not implemented conservation measures that (i) are directly related to protecting the migratory bird species affected by the proposed military readiness activity; (ii) would significantly reduce take of migratory bird species affected by the military readiness activity, (iii) are economically feasible, and (iv) do not limit the effectiveness of military readiness activities.
- (B) The Armed Forces fail to conduct mutually agreed upon monitoring to determine the effects of a military readiness activity on migratory bird species and/or the efficacy of the conservation measures implemented by the Armed Forces.
- (C) The Armed Forces have not provided reasonably available information that the Secretary has determined is necessary to evaluate whether withdrawal of take authorization for the specific military readiness activity is appropriate.

Migratory Bird Permits; Removal of Migratory Birds from Buildings

The USFWS published a final rule (Federal Register Volume 72, Number 193, October 5, 2007) that amended 50 CFR part 21 to allow removal of migratory birds (other than federally-listed threatened or endangered species, bald eagles, and golden eagles) from inside buildings in which the birds may pose a threat to themselves, to public health and safety, or to commercial interests. This regulatory addition facilitates removal of birds from buildings, which would otherwise require a migratory bird permit.

Birds removed under this rule must be captured using a humane method and, in most cases, immediately released to the wild. *This regulation does not allow removal of birds or nests from the outside of buildings*

without a permit. Removal of active nests from inside buildings must be conducted by a federally permitted migratory bird rehabilitator.

Current (2018) Status of the MBTA

On January 10, 2017, Memorandum M-37041 from the Department of Interior was issued opining that the MBTA prohibits incidental takings. The memo concluded that the prohibitions in the MBTA are not limited to hunting, poaching or any particular factual context, but rather they extend to any take or killing of migratory birds, including take that is incidental to otherwise lawful activities such as industrial or commercial activities. The opinion limited liability to where there is a close causal connection between an action and birds' deaths, and not to more attenuated takes, such as deaths caused by habitat modification.

On December 22, 2017, a new Department of Interior memorandum (M-37050) was issued that permanently withdrew and replaced memo M-37041. M-37050 concluded that "consistent with the text, history, and purpose of the MBTA, the statute's prohibitions on pursuing, hunting, taking, capturing, killing, or attempting to do the same apply only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs." Therefore, the interpretation of the MBTA has changed (incidental take does not violate the Act), but there have not been any changes to the law itself or Executive Order 13186.

1.3.4 Endangered Species Act

The signatory approval of this INRMP by the USFWS indicates USFWS overall approval of the plan and its concurrence that implementation of the plan will promote the conservation of listed species and is not likely to adversely affect listed species. Review of the INRMP is informal consultation with the USFWS, specifically the Rock Island Field Office in Rock Island, Illinois.

Per provisions of the 2004 National Defense Authorization Act¹², this INRMP *provides a benefit to the species for which critical habitat is proposed for designation*. USFWS policy states that, where applicable, federal critical habitat designation is not warranted if the INRMP includes certain criteria, which are summarized in Section 4.8.1, *Federally-listed Species Management Practices*.

1.3.5 Army Regulations

AR 200-1 (*Environmental Protection and Enhancement*) (Department of the Army 2007) provides policies, procedures, and responsibilities for implementing environmental programs, including those involving natural resources (formerly AR 200-3), cultural resources (formerly AR 200-4), and pest management (formerly AR 200-5). Chapter 4 of AR 200-1, *Environmental Asset Management* includes water resources, watershed, and land resources, which include fish and wildlife resources. Chapter 5, *Pest Management* and Chapter 6, *Cultural Resources* are also applicable to this INRMP.

AR 200-1 requires the preparation, implementation, and monitoring of an INRMP for each installation. This regulation also requires a regular review of INRMPs by the Army, not less than every five years, with updates, as appropriate. It provides policy, compliance requirements, major program goals, and program requirements for the conservation, management, and restoration of land and its natural resources consistent with the military mission and national policies.

AR 200-1 *should be used in conjunction with 32 Code of Federal Regulations (CFR) Part 651 (32 CFR 651), which provides Army policy on National Environmental Policy Act (NEPA, 42 USC 4321–4347) requirements*. 32 CFR 651 (AR 200-2) provides policies, procedures, and responsibilities for integrating

¹² Section 318, Military Readiness and Conservation of Protected Species, National Defense Authorization Act of 2004.

environmental considerations into Army planning and decision-making. It outlines NEPA compliance requirements of proposed Army actions.

1.3.6 List of Laws and Regulatory Instruments

Appendix 1.3.6 lists the most significant, but not complete, federal and state laws and regulations and other regulatory instruments that may affect implementation of this INRMP.

1.4 Biodiversity Conservation and Ecosystem Management

Biological diversity (biodiversity) refers to the variety and variability among living organisms and the environment in which they occur. Biodiversity has meaning at various levels including ecosystem diversity, species diversity, and genetic diversity. The DoD has developed *A Department of Defense Biodiversity Management Strategy* (The Keystone Center 1996). This Strategy identifies five reasons to conserve biodiversity on military lands:

- (1) *sustain natural landscapes* required for the training and testing necessary to maintain military readiness;
- (2) *provide the greatest return on the Defense investment* to preserve and protect the environment;
- (3) *expedite the compliance process* and help avoid conflicts;
- (4) *engender public support* for the military mission; and
- (5) *improve the quality of life* for military personnel.

The Keystone Center report (1996) notes that the challenge is *to manage for biodiversity in a way that supports the military mission*. This strategy identifies the INRMP as the primary vehicle to implement biodiversity protection on military installations. The model process developed within the strategy includes the following principles:

- support the military mission;
- use joint planning between natural resources managers and military operations personnel;
- integrate biodiversity conservation into INRMP and other planning protocols;
- involve internal and external stakeholders up front;
- emphasize the regional (ecosystem) context;
- use adaptive management;
- involve scientists and use the best science available; and
- concentrate on results.

DoD Instruction 4715.03 (*Natural Resources Conservation Program*) describes ecosystem-based management as, *a process that considers the environment as a complex system functioning as a whole, not a collection of parts, and recognizes that people and their social and economic needs are a part of the whole*. The DoD goal with regard to ecosystem-based management is, *to ensure that military lands support present and future training and testing requirements while preserving, improving, and enhancing ecosystem integrity. Over the long term, that approach shall maintain and improve the sustainability and biological diversity of terrestrial and aquatic (including marine) ecosystems while supporting sustainable economies, human use, and the environment required for realistic military training operations*.

DoD Instruction 4715.03 (*Natural Resources Conservation Program*) describes adaptive management as, *the process of implementing policy decisions as scientifically driven management experiments that test predictions and assumptions in management plans and using the resulting information to improve the plans*. Adaptive management is an important component of ecosystem-based management.

IAAAP will use ecosystem-based management to guide its program and adaptive management processes to modify implementation accordingly in the next five years and beyond. This management strategy enables the IAAAP to conduct its military mission while conserving natural resources, which provide the natural setting for that mission.

1.5 INRMP and NEPA Integration

This INRMP is an action-forcing document that triggers NEPA compliance requirements. 32 CFR Part 651 and AR 200-1 (2007) state that INRMPs will normally use EA procedures.

Environmental Analysis of Army Actions, 32 CFR Part 651, requires the integration of the NEPA process early in project planning to ensure that planning and decision-making reflect environmental values, prevent delays, and minimize potential conflicts. The CEQ Implementing Guidelines for NEPA (40 CFR Parts 1500-1508) require environmental analyses and documentation under the NEPA be integrated as much as practicable with other environmental reviews, laws, and executive orders. *Environmental Analysis of Army Actions*, 32 CFR Part 651 specifically identifies the integration or concurrent development of natural resources management plans with appropriate NEPA analysis and documentation.

Recognizing the efficiencies and benefits associated by combining the INRMP and its associated NEPA review into one document, this plan was developed to satisfy both requirements. However, the IAAAP also recognizes the importance of a thorough environmental review and analysis of its actions. As such, even though this plan qualifies for the CX, the previous EA has been updated and analyzed to ensure the best available science is being implemented and to ensure compliance. The INRMP has been reorganized from the Army Guidelines to accommodate NEPA documentation within the plan.

To assist in identifying elements of the NEPA analysis, the following are specific locations within this INRMP where the previous EA Sections (40 CFR Part 1508.9(b)) were updated:

- Purpose of and Need for Action - Section 1.5.1, *Purpose, Need, and Rationale*;
- Description of Alternatives including the Proposed Action - Section 1.5.4, *Alternatives*; chapters 4, 5, and 7;
- Description of Affected Environment - Chapter 3;
- Analysis of Environmental Consequences - Chapter 8;
- Analysis of Cumulative Impacts - Section 8.3, *Cumulative Effects*;
- Agencies and Persons Consulted;
- Distribution List; and
- Appendices.

1.5.1 Purpose, Need, and Rationale

The IAAAP proposes to implement its INRMP 2018-2023 at the Iowa Army Ammunition Plant, Middletown, Iowa. The purpose of the previous EA is to identify and evaluate environmental consequences of implementing the proposed plan, in accordance with the NEPA, the Council on Environmental Quality regulations, and 32 CFR Part 651. This combined INRMP/EA documents existing natural resources practices and can be used as an effective tool for future planning and decision-making purposes.

1.5.2 Scope

The Preferred Alternative is restricted to implementation of the INRMP. Environmental effects of implementing this plan at IAAAP were the focus of the updated previous EA integrated into this plan.

1.5.3 Impact Analysis

The analysis process involved the review of IAAAP natural resources-related data collected by IAAAP, other governmental agencies, universities, and contractors. The process involved interviews with IAAAP personnel involved with natural resources management.

The objective of this analysis is to provide an evaluation of environmental consequences of an implementable INRMP for IAAAP that can guide the Plant in the following activities:

- meeting military mission requirements,
- achieving natural resources management goals, and
- meeting legal and policy requirements, including those associated with the NEPA, that are consistent with national natural resources management strategies.

1.5.4 Alternatives

The NEPA requires the preparer of an EA to define and consider reasonable alternatives to the proposed action. Reasonable alternatives are those that are technically implementable. The Army reviewed possible management actions to determine the viability of implementing the actions while continuing to achieve its mission. The Army also considered all federal and state laws and regulations governing natural resources management to incorporate their requirements into proposed management actions.

There are issues that will not be considered in analysis sections as they take precedence over almost all management options. First and foremost, IAAAP's military mission must not be compromised. Therefore, options such as returning large areas (igloo storage areas) to pre-IAAAP conditions, or significantly increasing agricultural cropland, which would inhibit the Plant from performing its mission, will not be considered. The exception might be the adoption of restrictions or alterations to standard operating procedures to meet requirements of laws, such as the ESA or the Clean Water Act (CWA).

Secondly, issues of safety and security must also remain uncompromised. Safety and security are high priorities of operations at IAAAP and are directly related to maintaining the military mission. Therefore, management options, such as opening IAAAP to unrestricted access for recreational use, will not be considered.

1.5.4.1 Preferred Alternative: 2018-2023 INRMP Implementation (Proposed Management)

The Preferred Alternative would continue to implement those portions of the 2013-2018 INRMP (IAAAP 2013) that are pertinent to an evolving natural resources program with changes in programs that will enable IAAAP to improve its environmental stewardship and compliance programs requirements while also effectively and efficiently supporting the military mission.

The Preferred Alternative takes advantage of lessons learned during implementation of the current and past iterations of the INRMP as well as new advances in science and technology of natural resources management. The Preferred Alternative contains sufficient flexibility in its initiatives to allow managers to modify, as necessary, their implementation approaches, schedules, etc. or to accommodate changes outside of their immediate control. Changes in mission, funding and/or personnel reductions, or changes in off-IAAAP land use planning and development, would be accommodated and incorporated into the subsequent update of the INRMP. The updating of the INRMP could realign management intensities to better correspond to current needs and account for cumulative effects.

The Preferred Alternative is viable. The Preferred Alternative is described in chapters 4, 5, and 7 within sections titled **Proposed Management**, and environmental consequences regarding implementation of the Preferred Alternative will be analyzed in Chapter 8.

1.5.4.2 No Action Alternative: Continue Existing Management

The No Action Alternative would continue management to support the military mission, as outlined in the INRMP, 2013-2018 (IAAAP 2013). This alternative is viable. The No Action Alternative is described in chapters 4, 5, and 7 within sections titled **Current Management**, and environmental consequences regarding implementation of the No Action Alternative will be analyzed in Chapter 8.

1.5.4.3 Alternatives Considered but Eliminated

No Management. The No Management Alternative would not manage natural resources at IAAAP. This alternative is similar to the manner in which the Plant was managed prior to the passage of many environmental laws in the late 1960s through early 1970s and before the creation of professional natural resources management in the early 1980s. This is not a viable alternative. Laws and executive orders on endangered species, water quality, federal land management, outdoor recreation, etc., as well as DoD and Department of the Army policies, preclude implementation of the No Management Alternative. This alternative *will not* be further discussed.

Compliance Management

The Compliance Management Alternative would implement only those portions of the INRMP required to maintain compliance with laws. Compliance with laws, such as the ESA and the NEPA, would ensure implementation of some programs but would ignore other programs within the INRMP. It is a lower intensity natural resources management program that is reactive to violations of laws or threats of lawsuits.

Amendments to the Sikes Act require INRMPs to include programs (Section 1.3.1, *Sikes Act*) such as wildlife management, land management, fish and wildlife habitat management, etc. The Sikes Act further requires implementation of programs identified within the INRMP. Therefore, each program within the INRMP is compliance driven unless it is specifically identified as optional (dependent upon additional funding, dependent upon future conditions, etc.). Thus, the Compliance Management Alternative is virtually identical to the Preferred Alternative, which would be full implementation of the INRMP. The Compliance Management Alternative *will not* be further discussed in analysis sections.

Other Management Options

Virtually every major natural resources program at IAAAP (fish and wildlife, agricultural outlease, etc.) has many options other than ones selected for the INRMP. For example, there are many different strategies with regard to white-tailed deer (*Odocoileus virginianus*) harvest management, just as there are many different options for managing small pond fisheries and a wide variety of agricultural land management options. Many of these interact with each other. For example, changing the agricultural land management program would impact wild turkey (*Meleagris gallopavo*), deer, and other game species management, and impacts would be different among those species.

Possible options create thousands of potential combinations, each of which could be an alternative to the proposed action. Various laws, compliance documents, Army regulations, etc. prohibit the implementation of many of these possibilities. For example, closing IAAAP to hunting is not a viable option due to public law and Department of Army policy. On the other hand, changing the grazing rotation scheme to improve vegetation management is an option, and there are many choices. The same would be true of changing the prescribed burning program or changing the fisheries management strategy.

Other management options were considered and dismissed from further consideration for various reasons (e.g., ecological value, cost/benefit analyses, military mission compatibility) during development of the INRMP. Management programs and projects selected for the Proposed Action are based on knowledge and experience (adaptive management) from years of professional management of IAAAP natural resources and the best available science, research, and opinions available. The Other Management Options Alternative **will not** be further discussed in analysis sections.

1.5.4.4 Alternatives Summary

Each management section in chapters 4, 5, and 7 has two major subsections:

- **Current Management**, which is the No Action Alternative and describes ongoing activities or activities planned in the previous INRMP; and
- **Proposed Management**, which is the Preferred Alternative and describes planned activities in a project format.

Chapter 8, *Environmental Consequences and Conclusions*, analyzes environmental consequences of continuation of the Current Management and implementation of the Proposed Management.

1.5.5 Issues Not Considered to be Potentially Significant

The NEPA defines scoping as *an early and open process for determining the scope of issues to be addressed and for identifying significant issues related to the proposed action* (40 CFR 1501.7). These issues are used to develop alternative actions, including mitigation measures, and to evaluate environmental consequences of those actions. Many personnel identified in *Agencies and Persons Contacted* and *Plan Preparer* sections have discussed issues and concerns regarding natural resources management at IAAAP. This scoping resulted in the elimination of some potential issues from evaluation in the INRMP, as identified below.

Physiography, Topography, and Geology

Neither the Proposed Action nor its alternatives would affect physiography, topography, or geologic resources.

Petroleum and Mineral Resources

Neither the Proposed Action nor its alternatives would affect petroleum or mineral resources that may be found on IAAAP. There are no plans to find or develop such resources on IAAAP.

Noise Environment

Neither the Proposed Action nor its alternatives would affect the IAAAP noise environment. Proposed natural resources management would not create significant noise.

Air Quality

Air quality is regulated at the national level through regulations promulgated under the Clean Air Act of 1970 and its subsequent amendments. The Clean Air Act requires state or local governments to monitor ambient levels of pollutants that have federal standards.

The use of fire is limited on IAAAP, which annually prescribed burns about 20 - 60 acres, primarily to restore and maintain prairie areas. All burning is done in accordance with IAAAP Fire Department protocols. Appropriate officials and organizations are notified prior to any fire activity. Other activities (vehicle emissions, dust, etc.) generate relatively insignificant concerns for air quality. No other sources or air pollutants would be generated as a result of either alternative.

Hazardous and Toxic Materials

Even though some areas at IAAAP may have contamination by hazardous or toxic materials, neither the Proposed Action nor its alternatives would affect the generation or cleanup of these materials. If such materials were discovered during natural resources management activities, this information would be reported to environmental program personnel for action, if needed.

Facilities, Public Services, and Utilities

Neither the Proposed Action nor its alternative would significantly affect IAAAP facilities, public services, or utilities (*e.g.*, buildings, transportation system, communications system, water supply, stormwater drainage, sewage treatment, solid waste energy use). All facilities, public services, and utilities would continue to be maintained and operated in accordance with required permits and capabilities of the systems. Under both alternatives, the demand for utilities and roads would not be expected to change; therefore, neither alternative would affect facilities, public services, or utilities. The U.S. Army is currently developing a Master Plan for the facility. The Master Plan will focus on centralizing the footprint of primary military activities, where feasible. When completed, this will lead to a decrease in maintenance and development of areas outside the central footprint. As such, additional opportunities for natural resources management may present themselves over this, or the next 5-year cycle of the INRMP. Although still not considered to be potentially significant, implementation of the updated INRMP (Preferred Alternative) would allow the Natural Resources Program to readily take advantage of such opportunities.

Socioeconomics

IAAAP is a significant employer in southeastern Iowa. The Army staff includes 25 personnel and the prime contractor employs 600-800 additional personnel. Neither the Proposed Action nor its alternatives would have any significant effects on socioeconomic factors in the general IAAAP region.

Environmental Justice

Executive Order No. 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* [59 Federal Regulation No. 32], issued in February 1994, provides that *each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations*. The Proposed Action and its alternatives would be confined to IAAAP.

In terms of categories recognized by the U.S. Census, the approximately 340 residents of Middletown are mostly white (94%) with African-Americans (1.6%), Asians (1.6%), and Hispanics (1.3%) making up most of the remaining population (www.city-data.com 2017). In the larger city of Burlington (approximately 25,550), 84.8 percent of the population is white with African-Americans (8.2%), Hispanic (3.5%), and individuals of two or more races (2.8%) making up most of the remaining population (www.city-data.com 2017). In communities near IAAAP, there are no concentrations of minority or low income groups that may be affected by natural resources management on the Plant. Neither the Proposed Action nor its alternatives would have significant or disproportionate adverse effects on minority or low-income populations.

Environmental Health and Safety Risks for Children

Executive Order No. 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, [62 Federal Regulation No. 78] was issued in April 1997. This Executive Order directs each federal agency to *ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health or safety risks*. Sensitive areas for exposure to children are schools and family housing areas. Environmental health and safety risks are attributable to products that a child might come in contact with or ingest as well as safety around IAAAP. Proposed natural resources management is

within boundaries of IAAAP.

IAAAP has only one family housing unit on the property, but there are private residences immediately adjacent to the Plant. However, children are generally not exposed to natural resources management activities on IAAAP. The exception would be children who participate in outdoor recreation at IAAAP. There is a requirement by the state of Iowa for children who hunt to attend a hunter safety class, and this is applicable to those using IAAAP. IAAAP requires hunters and anglers to attend a mandatory safety briefing prior to participating in recreational activities. Neither the Proposed Action nor its alternatives would have significant or disproportionate adverse effects on children or pose health or safety risks.

1.5.6 Interagency Coordination and Public Review

Interagency coordination was invited through the INRMP/EA development process using personal communications and reviews of drafts in 2018. Drafts of the 2013 INRMP/EA were used to inform decision makers and the public of likely environmental and socioeconomic consequences of implementing the Preferred Alternative and its alternatives. American Indian tribes were notified of the development of the INRMP/EA and were invited to participate in 2018, per the *American Indian and Alaska Native Policy* (Department of Defense 1998).

Comments received during meetings and discussions as well as responses to requests for reviews with agency representatives and American Indian tribes were used for development of the final INRMP/Categorical Exclusion. Appendix 1.5.6 includes correspondence with USFWS, IDNR, and American Indian tribes affiliated with IAAAP pertaining to preparation and review of the 2018 INRMP/Categorical Exclusion. The previous (2013) Finding of No Significant Impact (Appendix 8.5.2) was published in the *Hawkeye* (see Appendix 1.5.6), and the INRMP was available from IAAAP.

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2.0 RESPONSIBLE AND INTERESTED PARTIES

*We must strive to become systems thinkers if we are to benefit from the interrelationships of the triple bottom line of sustainability: mission, environment, and community.*¹³

2.1 Iowa Army Ammunition Plant

The IAAAP is a government-owned, contractor-operated installation. American Ordnance LLC is the operating contractor for IAAAP.

2.1.1 Commanding Officer

The IAAAP Commanding Officer implements policies and directives of the Department of the Army and bears ultimate responsibility for management of natural resources on IAAAP, including its land and wildlife. Pursuant to AR 200-1 (Department of the Army 2007), acting through the Operations Support Division, the Commanding Officer is responsible for:

- ensuring that Base Support activities support military training and readiness operations, enhance mission accomplishment, and are conducted in a manner conducive to environmental stewardship;
- assessing long-term resource impacts of all environmental agreements and coordinating resource implications for agreements through command channels as appropriate prior to approval;
- ensuring all environmental program plans are completed and implemented per guidance in chapter 3, AR 200-1;
- designating personnel who are responsible and accountable for executing major program requirements as prescribed in chapters 4 through 14, AR 200-1;
- depositing all proceeds from Conservation Reimbursable Programs as outlined in Section 2665, Title 10, United States Code (10 USC 2665); Section 2667, Title 10, United States Code (10 USC 2667); and Sections 670a and 670b, Title 16, United States Code (16 USC 670a and 670b, Sikes Act);
- executing the environmental budget to meet critical requirements;
- maintaining an efficient and well-trained environmental staff;
- ensuring that Army law enforcement personnel are trained in conservation law enforcement where appropriate;
- ensuring that sufficient numbers of professionally trained natural resource management personnel and natural resources law enforcement personnel are available and assigned the responsibility to perform tasks necessary to comply with Section 670e, Title 16, United States Code (16 USC 670e);
- approving integrated natural resource management plans (INRMPs);
- holding tenant units accountable for complying with the policies and standards of the installation; and
- designating an installation wildland fire program manager and approve the integrated wildland fire management plan.

In addition to these specific regulatory requirements, acting through the Operations Support Division, the IAAAP Commander accomplishes the following to support the natural resources program (IAAAP 2013):

¹³ Robert J. Schoomaker, U.S. Army Chief of Staff, and R.L. Brownlee, Acting Secretary of the Army. Excerpt from *The Army Strategy for the Environment*, “Sustain the Mission – Secure the Future”

- providing for funding and staffing of natural resources management professionals and other resources required to effectively manage natural resources on IAAAP;
- planning land utilization to avoid or minimize adverse effects on environmental quality and provide for sustained accomplishment of the mission;
- entering into appropriate cooperative plans (16 USC 670a) with state and federal conservation agencies for the conservation and development of fish and wildlife, soil, outdoor recreation, and other resources;
- ensuring ongoing and timely coordination of current and planned land uses between mission, natural resources, environmental, legal, and master planning;
- inspecting and reviewing mitigation measures that have been implemented or recommended for the protection of natural resources as prescribed in environmental documentation in accordance with the NEPA; and
- ensuring all IAAAP land users are aware of and comply with procedures and requirements necessary to accomplish objectives of this INRMP together with laws, regulations, and other measures designed to comply with environmental quality objectives.

2.1.2 Contract Administration Division

The Contract Administration Division is primarily responsible for contracts and property within IAAAP which includes the land, forest, fish and wildlife, and cultural resources management at IAAAP. Personnel includes a Chief, Administrative Contracting Officer, Industrial Engineer, Contract Price Cost Analyst and Natural Resources Manager.

The Contract Administration Division, acting primarily through the Natural Resources Manager, is responsible for:

- developing and implementing programs to ensure the inventory, delineation, classification, and management of all applicable natural resources to include: wetlands, scenic areas, threatened and endangered species, sensitive and critical habitats and other natural resource areas of special interest;
- providing for the training of natural resources personnel;
- implementing this INRMP;
- reviewing all construction designs and contract proposals to ensure adequate protection of natural resources, ensuring that technical guidance as presented in this INRMP is adequately considered;
- coordinating with local, state, and federal governmental and civilian conservation organizations relative to natural resources management for IAAAP;
- managing all phases of the natural resources program for IAAAP with appropriate natural resources management personnel; and
- coordinating the Plant pest control program.

General responsibilities of the Natural Resources Manager include

- administering the hunting and fishing program;
- managing wildlife and conducting related research;
- managing agricultural leases;
- managing forest resources;
- managing wetland resources;
- pest management;

- NEPA compliance;
- determining natural resources budget requirements;
- cooperating with the IDNR on regulations governing harvest of fish and wildlife on IAAAP;
- coordinating with safety and security personnel to ensure hunting and fishing activities do not adversely impact the military mission of IAAAP;
- operating wildlife check stations to collect biological and other data during hunting seasons;
- ensuring federal, state, and IAAAP laws and regulations pertaining to natural resources and the environment are enforced; and
- cultural resources management.

2.1.3 Operations Support Division

The Operations Support Division is primarily responsible for all environmental, safety, security and project oversight in coordination with the Contract Administration Division.

2.1.4 Other Installation Organizations

Implementation of this plan requires the assistance of other organizations on IAAAP. Such organizations include the Contract Management Division, which is responsible for oversight of contracts with the operating contractor.

2.2 Other Defense Organizations

2.2.1 Northeast Region Installation Management Command

The Northeast Region Installation Management Command, located at Fort Monroe, Virginia, is responsible for providing technical guidance to the IAAAP natural resources program by:

- assisting with program implementation and conducting staff visits to IAAAP,
- ensuring that effective natural resources stewardship is an identifiable and accountable function of management, and
- providing technical review of the INRMP.

2.2.2 Army Environmental Command

The Army Environmental Command, located at Fort Sam Houston, Texas, provides oversight and centralized management and execution of Army environmental programs and projects. It has support capabilities in the areas of the NEPA, endangered species, cultural resources, environmental compliance, and related areas. The Army Environmental Command is responsible for the agriculture and forestry reimbursable programs and distributes the funding back to installations.

2.2.3 Joint Munitions Command

The Joint Munitions Command, located at Rock Island Arsenal, Illinois, is responsible for command and control of IAAAP and other ammunition plants. The Joint Munitions Command is one of 11 major subordinate commands of the Army Materiel Command, located at Redstone Arsenal, Alabama. Natural resources funding flows to IAAAP through the Joint Munitions Command. Joint Munitions Command is responsible for installation environmental compliance funding in addition to production, storage, issue, and demilitarization of conventional ammunition.

2.2.4 U.S. Army Corps of Engineers

Several districts of the U.S. Army Corps of Engineers (USACE) assist IAAAP with natural and cultural resource issues and guidance. USACE provides agricultural leasing services and monitors lease provisions for the Natural Resources Manager at IAAAP. USACE also provides services in the areas of the CWA, Section 404 jurisdictional wetland permitting and guidance, and cultural resources management planning. In addition, the USACE provides contractual support to the installation.

2.3 Other Federal Agencies

2.3.1 U.S. Fish and Wildlife Service

The USFWS is a signatory cooperator in implementation of this INRMP in accordance with the Sikes Act. Appendix 1.5.6 contains USFWS recommendations on various IAAAP activities that may impact various species and/or habitats. Appendix 2.3.1 contains specific items of agreement among the USFWS, the IDNR, and IAAAP, as required by the Sikes Act. In addition, IAAAP uses reimbursable agreements with the USFWS Columbia Field Office on an as needed basis for functions such as conducting fisheries surveys.

2.3.2 U.S. Department of Agriculture

The U.S. Department of Agriculture (USDA) provides IAAAP with project support and review, as well as comment and approval, of agricultural plans for the installation. The USDA is involved with identifying the location and extent of CWA, Section 404 jurisdictional wetlands on the installation. In addition, the Natural Resources Conservation Service (NRCS) of the USDA provides assistance with erosion and sedimentation plans and advises on soil productivity.

2.4 Iowa Department of Natural Resources

The State of Iowa, functioning through the Director of the IDNR, provides assistance in managing wildlife, consulting on forest management practices, managing threatened and endangered species, and assisting with enforcement. In accordance with the Sikes Act, IDNR is a signatory cooperator in implementation of this INRMP. Appendix 1.5.6 contains IDNR comments on the draft INRMP and IAAAP responses to those comments. Appendix 2.3.1 contains specific items of agreement between the IDNR, USFWS, and IAAAP, as required by the Sikes Act.

2.5 American Indian Tribes

The United States has a unique legal relationship with American Indian tribal governments as set forth in the Constitution of the United States, treaties, statutes, executive orders, and court decisions. Since the formation of the Union, the United States has recognized American Indian tribes as domestic dependent nations under its protection. Executive Order 13175 and the *American Indian and Alaska Native Policy* (Department of Defense 1998) establish regular and meaningful consultation and collaboration with Indian tribal governments. IAAAP provides a process that permits elected officials and other representatives of Indian tribal governments to provide meaningful and timely input on actions or policies that might be of tribal interest, such as those that may affect sacred or Indian cultural sites. The Sac and Fox Nation and the Iowa Tribe claim ancestral use of the lands on IAAAP.

2.6 Universities

IAAAP has used the expertise from universities to provide specialized knowledge. For example, the Botany Department at the University of Iowa conducted an extensive botanical survey on IAAAP in 1995 (Horton *et al.* 1996). Iowa State University has cooperatively developed crop test plots on IAAAP, and the Iowa State University Health Department has collected wildlife samples (blood and ticks) for chronic wasting disease and lyme disease studies and mosquitoes for West Nile research.

2.7 Municipalities

Communities adjacent to, or in proximity of IAAAP are positively affected by natural resources management on the installation. IAAAP provides hunting and fishing opportunities for the general public. There are no significant conflicts between natural resources management on IAAAP and surrounding communities. IAAAP management enhances surrounding wildlife populations with animals moving off-Plant, which offers more consumptive and nonconsumptive opportunities.

2.8 Contractors

American Ordnance LLC is the operating contractor for IAAAP. IAAAP uses contractors for many programs associated with natural resources including NEPA documentation, INRMP preparation, cultural resources surveys, water quality studies, and other similar projects.

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3.0 AFFECTED ENVIRONMENT

*We do not own this land; we are caretakers of the land and the plant and animal species that inhabit it. The American people entrust the land to our care, and we shall fulfill their trust. We shall conserve and protect these resources for the future.*¹⁴

3.1 General Background

Much of the information in this chapter is taken from the *Iowa Army Ammunition Plant, Integrated Natural Resources Management Plan and Environmental Assessment, 2013-2018* (IAAAP 2013). Other sources are specifically referenced.

3.1.1 Location

IAAAP is located about five miles west of the city of Burlington and immediately south of Middletown, Iowa in Des Moines County, located in southeastern Iowa (Figure 3.1.1). U.S. Highway 34 borders the northern section of IAAAP. The installation is easily accessible from the Burlington Municipal Airport and the Burlington Northern Railroad.

3.1.2 Neighbors

The area surrounding IAAAP is mostly agricultural cropland and pastureland. Small businesses, such as general stores or gas stations and rural homes, are located around the periphery of the installation. The community of Middletown borders the installation to the immediate north. The population of Middletown was estimated to be 336 in 2014 (www.city-data.com 2017). Other communities near IAAAP include Augusta, Danville, West Burlington, and Burlington. Burlington is the nearest larger community and had an estimated population of 25,539 in 2014 (www.city-data.com 2017).

3.1.3 Acreage and Acquisition

In 1940, the present-day location of the Plant was selected for World War II-era ammunition production. Homes and other structures were purchased to facilitate construction of the Iowa Ordnance Plant, a shell-loading and munitions facility. At the time the U.S. Government took possession of the new plant location, the property included about 20,450 acres of what had once been about 200 farms, six school districts, several cemeteries and churches, and the Des Moines County Farm for the Indigent (Earth Tech, Inc. 2002). Today, IAAAP consists of approximately 19,011 acres.

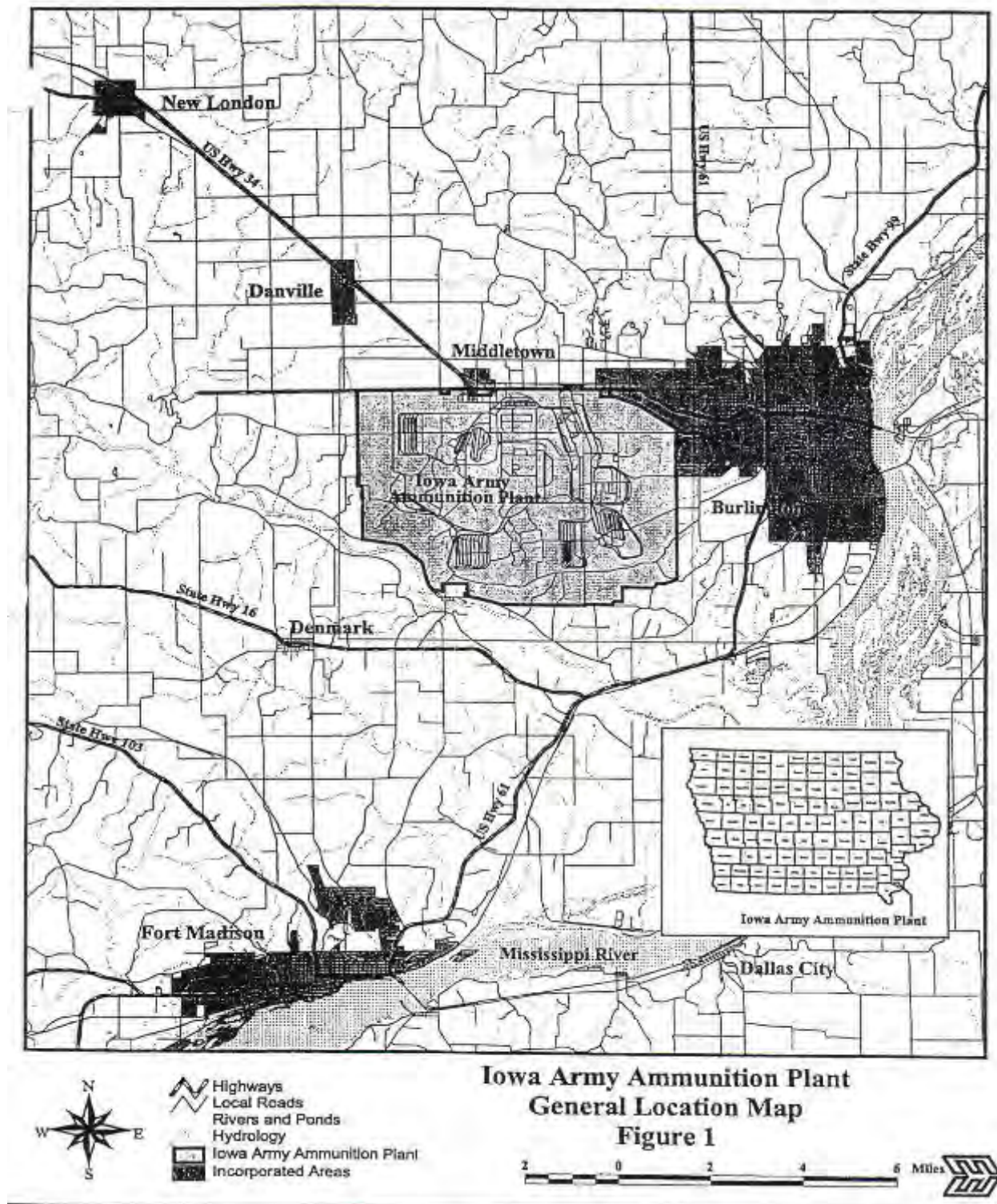
3.1.4 Installation History

The Iowa Ordnance Plant was dedicated in July 1941, nine months after the land for the installation was acquired. The installation was one of several throughout the United States that were established as part of the country's increasing military involvement in World War II. Production of ammunition began in September 1941 and continued daily until the end of World War II in August 1945. During this period, the installation produced artillery rounds, ammunition components, and large aerial bombs. Immediately after World War II, installation work was limited to long-term storage, surveillance, renovation, demilitarization, and reconditioning of wartime munitions.

As part of the renovation of the installation during the post World War II period, private contractors rehabilitated the installation's Line 1 for the Atomic Energy Commission. Line 1 assembled sealed components into nuclear weapons from 1948 until 1975, when its functions were relocated to Texas.

¹⁴ Robert M. Walker, former Assistant Secretary of the Army, Testimony before Congress, July 11, 1995.

Figure 3.1.1 Iowa Army Ammunition Plant Location



Source: IAAAP 2000

Ammunition production at the Iowa Ordnance Plant expanded significantly beginning in June 1950 at the onset of the Korean conflict. Both conventional and nuclear weapons were produced there during the conflict. Production and number of personnel tapered off at the end of the conflict until the mid-1960s, when the United States became more involved in the Vietnam War. Vietnam era production at the installation included artillery rounds, grenade components, demolition blocks, antipersonnel mines, mortar rounds, and assorted components. IAAAP continued to produce a similar line through the 1970s.

During the 1980s, buildings were upgraded, and modern production facilities and equipment were added. In the early 1990s, demilitarization of conventional ammunition became a primary mission of the installation. Demilitarization is the disassembly and disposal of old or obsolete ammunition. This mission continues today.

The installation is also the foremost provider of high-precision warheads and munitions in the nation's defense industrial base and is involved in research, development, production, inspection, assembly, and testing. Within the scope of capabilities, however, there are specific areas of national and international pre-eminence, such as pressing. The installation is recognized as a world leader in the high-, medium-, and low-volume production of pressed warheads. The installation has approximately 500 acres in the fire area that closely support development and production, which are based on the rapid feedback of test results.

Today, IAAAP produces and stores ammunition, performs research, and develops warheads and large-caliber projectiles. Other activities include grazing, agriculture, and outdoor recreation, including hunting and fishing.

3.1.5 Military Mission

3.1.5.1 Mission of IAAAP

The mission of the IAAAP is to manufacture and deliver large caliber items for the Department of Defense using modern production methods in support of worldwide operations. Iowa Army Ammunition Plant is a Group Technology Center for missile warheads, tank ammunition, artillery rounds and demolition charges. The plant is a one-of-a-kind national resource that provides "total munitions solutions" for the Defense industrial base, which includes research, development, production, inspection, testing, assembly, packing and demilitarization.

3.1.5.2 IAAAP Population and Tenants

American Ordnance LLC employs 600-800 persons at IAAAP. There are about 25 government personnel on staff at IAAAP. There are third-party tenants operating under arrangements with American Ordnance LLC; all have fairly small operations and few personnel on the Plant.

3.1.5.3 Natural Resources Needed to Support the Military Mission

IAAAP has adequate land area to support the mission. Open space provided by IAAAP's acreage is essential to the military mission. The importance of open space is due to quantity distance requirements associated with ammunition production and storage areas. A specified quantity distance arc is associated with each production and storage area and is required primarily for safety reasons. Quantity distance arcs restrict other types of uses and access to such areas.

Open space aids in security and is important for the Plant's demilitarization and testing operations. Open space provides options for siting specific demilitarization sites or test areas. Open space also provides options for the amount and type of buffer area surrounding such sites. Natural resources management is an important aspect of maintaining IAAAP's open space. A large area (7,500 acres) on IAAAP is used for explosive buffers and is leased for agricultural and grazing purposes.

Vegetation plays an important role at IAAAP for both the military mission and environmental protection. Vegetation is important in maintaining the Plant's open space as well as providing reduced fire hazard by using specific vegetation. The Army also recognizes the need to minimize damage to vegetation, lest the military environment be compromised, and problems, such as soil erosion, make it unsuitable for future use. Viable water resources are also needed to accomplish the mission at IAAAP.

3.1.5.4 Effects of the Military Mission on Natural Resources

Compared to the surrounding area, IAAAP has retained much of the natural character of the landscape, acting as a refuge for some plants, animals, and natural communities. Much of the land at IAAAP is undeveloped. Nonetheless, threats to these resources arise from military activities.

The industrial nature of the mission does not typically involve land-disturbing activities. Handling and disposing of industrial materials is performed in compliance with relevant state, federal, and DoD requirements. These activities do not have an adverse effect on natural resources, and compliance requirements are related to resources protection and/or remediation (e.g., water quality, air quality, training).

IAAAP is continually experiencing land-disturbing activities associated with mission requirements, construction, and updating of infrastructure such as water and sewer lines. Construction of a new gas line and a 40-millimeter test range have been completed, and improvements continue. A new fire safety and security building has been constructed and occupies approximately 3-5 acres.

Building renovations/updates will be based on mission needs and the Armament Retooling and Manufacturing Support (ARMS) program. The ARMS program is designed to encourage commercial use of the Army's Active Ammunition Plants / Depots through various incentives for businesses willing to locate to a government facility.

Cleanup activities of the Formerly Utilized Site Restoration Program cause land disturbance as do remediation actions of the Installation Restoration Program which are ongoing. The Military Munitions Response Program includes fencing projects that also cause land disturbance.

Munitions Production and Demilitarization

IAAAP has installed a closed-loop, pinkwater treatment system that decreases the use of potable water in munitions production. All munitions items accepted for demilitarization are disassembled to recycle salvageable materials. Explosives, propellants, and steel casings are made available for resale to Army-approved buyers. Air emissions from the equipment are in compliance with state permits.

Dumpster buckets are located throughout the installation. These buckets collect unrecoverable, non-hazardous, non-explosive solid waste from the facility.

Past Military Mission Impacts on Natural Resources

Initial development of IAAAP with its buildings, roads, railroads, igloos and magazines, and associated infrastructure had a significant impact associated with the military mission on IAAAP natural resources. Development of these facilities drastically altered farm lands and natural areas and changed the character of the Plant area indefinitely.

Military Training

Past training activities on IAAAP consisted of bivouacking, digging, grading, and vehicular training. Training affected natural resources, primarily causing erosion and vehicular terrain damage in training areas. However, training did not impede the production of munitions. A license for use of IAAAP lands for training was approved among the Iowa National Guard, local Army Reserve units, and the installation in 1984. This license expired in November 1989; however, training continued at the installation, and more than 2,000 soldiers from four units used the installation for unit training (IAAAP 2000). Utilization increased to 4,070 soldiers within six units in 1990 (Mason & Hanger Corporation 1991). In 1995, five units used the installation for unit training until September 1995 when training was stopped due to the training unit's refusal to provide NEPA documentation for its training activities.

Military training is not an installation mission. However, training currently occurs on about 500 acres in the southeastern corner of IAAAP by the Iowa Army National Guard and local Army Reserve units for improvised explosive device and night driver training exercises. Timing, amount, and type of training are strictly controlled.

U.S. Environmental Protection Agency's National Priorities List

In 1990, IAAAP was listed on the U.S. Environmental Protection Agency's (USEPA) National Priorities List due to contamination from past industrial practices. IAAAP's objective is to clean up the environment to natural levels and be deleted from the National Priorities List. Line 1 Facilities, located in the northeastern portion of IAAAP, reportedly generated the greatest volume of explosive waste and pinkwater from 1948 until 1975. Pinkwater is a hazardous by-product of munitions production. In 1948, an earthen embankment was constructed along the upper reaches of Brush Creek to impound wastewater discharged from Line 1.

IAAAP's objectives led to remedial activities on the installation, which involved land disturbance. IAAAP performed several cleanup activities:

- Groundwater and surface water contamination were detected at and near the Inert Disposal Area. The remedy to ensure long-term protection of human health and the environment included building an impermeable cover or cap over the Inert Disposal Area and performing groundwater monitoring at the site. Monitoring is on-going.
- Wetland Construction: Wetlands have been developed to enhance the IAAAP Environmental Stewardship Program. This project developed new wetlands at Line 1 lagoon and Line 800 lagoon.
- The wetland at a borrow site (Pond 40) has filled with water, creating about three acres of surface water. Native invading wetland vegetation has created habitats for waterfowl, furbearers, herpetofauna, and fish.
- Lines 1 and 800 wetlands primarily function as filtration and wildlife habitat. These areas were planted with flora that specialize in breaking down contaminants.

Although the INRMP is not the appropriate mechanism for dealing with contamination issues, it is a tool to the Installation Restoration Program in gathering information and managing natural resources in a manner that will avoid unnecessary injury from Installation Restoration Program response actions. The Natural Resources Manager continues to provide support and technical expertise to the Installation Restoration Program.

Future Military Mission Impacts on Natural Resources

It is difficult to quantify effects of future military missions on natural resources at IAAAP. If basic mission, land area, and intensity of missions remain unchanged, mission impacts on natural resources will remain similar to those today. IAAAP's primary mission is not likely to change, nor in this era of declining

resources, is the size of its land area. However, the ARMS program could lead to additional building construction, renovations, and infrastructure updates. This in addition to the IAAAP's efforts to centralize its footprint within the facility, could also lead to the demolition and removal of older ancillary buildings and infrastructure.

Unit Changes

The Army is being forced to make do with less in terms of both quantity and quality of training lands. Effective training resources must be managed so as to not exceed the optimum training carrying capacity of sites to ensure the long-term use of the resource can be guaranteed. Base Realignment and Closure is a reality, and other military missions may look toward IAAAP to fulfill their future training needs. New missions would need to be closely scrutinized to determine their compatibility with the current mission and resources of IAAAP.

Environmental Stewardship

There are numerous positive effects of the military mission on natural resources. The most general and most significant on IAAAP is its commitment to natural resources management, including minimization and mitigation of military mission damage. This commitment to natural resources is beneficial for both natural resources and people who use natural resources products.

The environmental, geographic, political, and economic components of the installation are enhanced by cooperation between the Army, state and local agencies, academia, and private individuals. These entities strive to protect the environment from future adverse environmental impacts and to remediate areas that have been impacted by past industrial practices at IAAAP.

The presence of IAAAP continues to preserve native ecosystems by preventing development and by ensuring that land uses are conducted in a manner that protects the environment. Natural resources considerations and safety demands associated with the production, storage, and demilitarization mission limit the extent of other potentially damaging land uses.

3.1.5.5 Effects of Natural Resources or Their Management on the Military Mission

Environmental constraints at IAAAP are related to maintaining and/or exceeding relevant compliance requirements for groundwater, storm water, air, endangered species, and other resources. These constraints affect IAAAP's ability to perform its military mission; however, they significantly benefit the installation's natural communities. By virtue of being a military installation, most resources at IAAAP have retained values often lost in areas less protected. Wetlands and the many functions they provide, such as acting as filtration systems and water retention areas, may have been lost without IAAAP establishment. Natural systems are advantageous to and often enhance the military mission.

The agricultural program has the highest degree of impact on the mission of IAAAP. Foremost, the proper use of grazing, haying, and crop production results in a significant reduction in fire hazard and maintenance costs across the Plant. These areas would normally be mowed or sprayed with herbicide at a significant cost to the government. The agricultural program also provides a significant source of income for the Plant and to the Department of Army Agricultural Reimbursable Account.

Negative aspects of natural resources management are relatively minor. These include increased traffic from the agricultural lessees and occasional stray livestock. There have been no mission conflicts with wetlands or threatened or endangered species on IAAAP. Most wetlands occur well away from production areas, and it is unlikely that conflicts with the mission and wetland conservation will occur over the next five years.

IAAAP is known as a military installation that provides high quality white-tailed deer and wild turkey hunting. This, along with recreational fishing, has influenced the Plant's ability to perform its mission. Security and safety issues are of concern when allowing the IAAAP community, as well as the general public, to access installation areas that would otherwise be off-limits. Procedures for allowing access have been developed and implemented. In general, these procedures require extra effort by IAAAP, particularly for hunting. IAAAP has adapted to impacts that management of its natural resources has imposed on the military mission and is proving that they are not mutually exclusive.

3.2 Physical Environment and Climate

3.2.1 Physiography and Topography

IAAAP is in the Southern Iowa Drift Plain (Prior 1991). The highest elevation in the county, 862 feet above mean sea level (ft msl), is located about three miles southwest of Yarmouth. The lowest elevation, about 520 ft msl, lies at a point where the Skunk River enters the Mississippi River at the southeastern boundary of the county. Vertical intervals between lowlands and adjoining uplands generally range from 50 to 120 feet. Elevations at IAAAP range from 732 ft msl along the northern extent of the installation, to about 544 ft msl throughout the extensive southern area of Long Creek and Skunk River.

3.2.2 Geology

Approximately one million years ago the first of the Pleistocene glaciers began to form in Iowa. The third glacial epoch, the Illinoian, pushed west from the Labradiorean Center and entered Iowa only in the southeastern part of the state. Here the ice pushed the Mississippi River westward, and for a time the river flowed around the western edge of the lobe of ice; when the ice melted, the river returned to its former channel. In the area of the Illinoian ice sheet the glacial drift averaged 30 feet deep.

During interglacial periods, loess was deposited on the glacial drift. Loess is windblown material composed principally of silt with small amounts of sand and clay and is the basis for the development of very good soil. It is found in many places throughout the state, including the installation.

The land of southern Iowa has been subjected to erosion by water longer than the land in northern Iowa. Rivers have deepened their channels; intervening lands, frequently more than 200 feet higher in elevation than the floodplains, are well drained. Southern Iowa is described as a maturely dissected plain.

According to the Seismic Risk Map, the Burlington area of Iowa is in Zone 1, an area relatively free of earthquakes (Mason & Hanger Corporation 1995).

3.2.3 Petroleum and Mineral Resources

No known oil or mineral deposits exist within IAAAP (Mason & Hanger Corporation 1995).

3.2.4 Soils

Des Moines County soils are loess-covered glacial till that formed under prairie and forest vegetation. Native tall-grass prairie once occurred on the nearly level and gently sloping soils in uplands. These soils developed in loess. Steeper areas formed in glacial till and had native vegetation of trees. Trees also occurred along the alluvial bottomland associated with the Mississippi and Skunk rivers (Soil Conservation Service 1983).

With exception of developing soils associated with rivers and drainages, soils on IAAAP belong to either the Mollisols or Alfisols soil orders. Mollisols are relatively fertile soils and are characterized by a soft

surface character, a high base saturation (generally indicative of fertile soil), and a dark color due to abundant humus. Alfisols are also relatively fertile soils with moderate to high base saturation. The U.S. Corn Belt occurs mainly on Alfisols and Mollisols and has one of the most intensive forms of agriculture (Steila 1976). Agriculture plays a major role in Des Moines County with almost 56% of the county designated as prime farmland.

Twenty-seven soil series are mapped by the NRCS as occurring on the installation (Soil Conservation Service 1983). Many series are present only in small areas on IAAAP. NRCS includes soils maps of IAAAP. Maps showing soils on IAAAP are also available in the IAAAP Natural Resources office. Soil series are described in detail by the NRCS (Soil Conservation Service 1983).

Prime Farmland

IAAAP encompasses several areas designated as prime farmland (IAAAP 1997). Prime farmland, as defined by the U.S. Department of Agriculture, is land that is best suited to producing food, feed, forage, fiber, and oilseed crops. It is of major importance in providing the nation's short- and long-range needs for food and fiber (Soil Conservation Service 1983). Almost 75% of the soil series represented on the installation meet criteria for prime farmland.

Soil Erodibility

In general, IAAAP soils are not considered highly erodible. Most soils have an erosion T factor of 5 (5 tons per acre per year). An erosion T factor, as defined by the U.S. Department of Agriculture, is an estimate of the maximum average annual rate of soil erosion by wind or water that can occur without affecting crop productivity over a sustained period. There is a potential for erosion by water at earth-covered magazines and from overgrazing in leased lands.

3.2.5 Water Resources

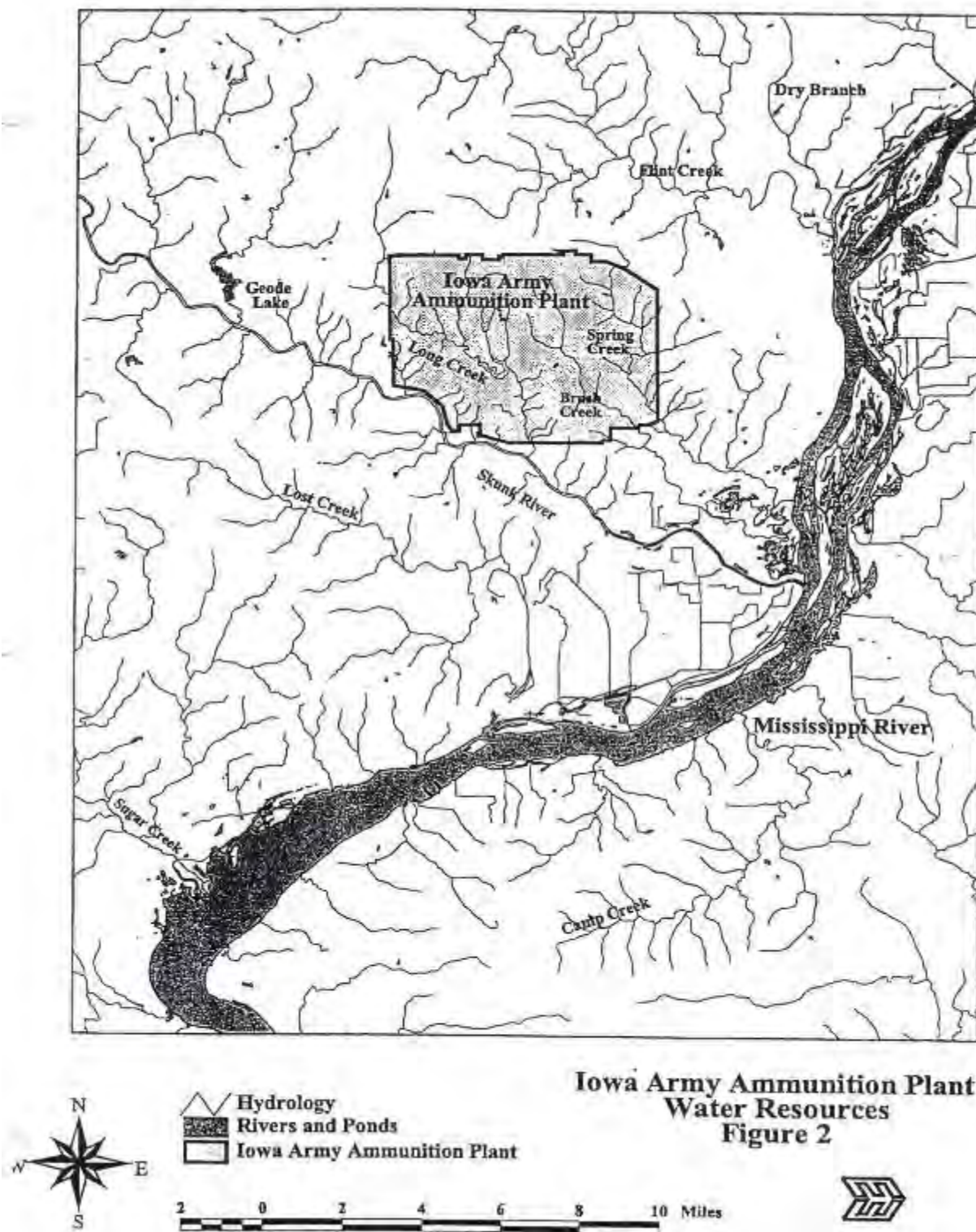
3.2.5.1 Surface Water

About 20 miles of streams are located on IAAAP (Mason & Hanger Corporation 1991). There are three major drainages and numerous minor drainages within the installation. Long Creek is in the western part of the installation and flows into Mathes Lake before leaving the installation on its southern boundary. Brush Creek is more centrally located and leaves the installation in the extreme southeastern corner flowing into the Skunk River. Spring Creek drains the eastern part of the installation. Long Creek is in the Skunk River watershed. The Skunk River is located adjacent to the southern border of the installation and is a major tributary of the Mississippi River, which is about eight miles east of IAAAP. Spring Creek drains directly into the Mississippi River (Figure 3.2.5.1). Flint Creek drains 75-100 acres of the installation on the northern edge.

These drainages primarily flow from northwest to southeast on IAAAP. The creeks are relatively small, averaging about sixteen feet wide and six inches deep. About 90% of the watershed for Long Creek is located outside IAAAP. All of the Brush Creek watershed (6,300 acres) and most of the Spring Creek watershed (8,600 acres) are on IAAAP. The watershed of Long Creek is impounded in two places by Stump Lake (Lake #18) and Mathes Lake (Lake #19) (Mason & Hanger Corporation 1991).

Almost all crop and pasture lands had tile drains installed before the land was purchased by the government. Tile drainage systems have been maintained by lessees as part of lessee services. There are also about 500 miles of drainage ditches on the installation (Mason & Hanger Corporation 1991).

Figure 3.2.5.1 Iowa Army Ammunition Plant Surface Water Resources



Source: IAAAP 2000

Surface Water Quality

IAAAP operates under the National Pollutant Discharge Elimination System (NPDES) Permit authorized under Iowa Code Section 455B.174, and Rule 567-64.3, Iowa Administrative Code, and issued by the Director of the IDNR. The permit regulates point source discharges and establishes monitoring requirements and effluent pollutant limitations on the discharges. The IAAAP permit allows industrial discharges at fourteen locations, sanitary discharges from two domestic treatment plants, and monitoring of non-point source storm water runoff at two locations. Discharges from the units are to Brush Creek, Long Creek, and an unnamed tributary of the Skunk River. Brush Creek and Long Creek are also tributaries of the Skunk River.

3.2.5.2 Floodplains

Floodplains can be defined as lowland, typically flat areas adjoining surface waters, including, at a minimum, that area subject to a one percent or greater chance of flooding in any given year. The magnitude of a floodplain depends on numerous factors, including the size of the watercourse, size of the watershed, topography adjacent to the watercourse, soils and geology, and density of development in the watershed and adjoining the watercourse. Floodplains on IAAAP consist primarily of riparian areas associated with the Plant's streams. Figure 3.2.5.1 shows surface water features of IAAAP and the surrounding area.

3.2.5.3 Groundwater

The town of Burlington provides IAAAP with drinking water. The thick sequence of shale-dominated, Pennsylvanian bedrock underlying central and southwestern Iowa is a poor source of groundwater for wells (Prior 1991). Four major aquifers exist in the IAAAP area (USACE 1985): the Mississippian, Devonian, Jordan sandstone, and Cambrian-Ordovician. The Mississippian aquifer is 250 - 500 feet below ground surface and has a yield of less than 20 gallons per minute. Water quality is fair to good with a high mineral content. The Devonian aquifer is 750 - 1,000 feet below ground surface. In the vicinity of IAAAP, the yield is only 20 - 50 gallons per minute. Water quality is fair to poor with a very high mineral content. The Jordan sandstone, which is part of the Cambrian-Ordovician aquifer, is 1,850 - 2,000 feet in depth. It yields 1,000 gallons per minute and is the source of water for most industry and cities in southeast Iowa that do not use river or stream water. Water is hard, but quality is fair. It is less highly mineralized than the Mississippian and Devonian aquifers.

3.2.6 Climate

IAAAP's mid-continental location and the amount of rainfall received per year characterize the climate as "humid continental long summer" (Sage 1976). This climatic type brings moisture from the Gulf of Mexico, providing adequate rainfall at the right time of year and ensuring temperatures high enough for lush growth of corn, a major crop on IAAAP, during a long growing season. The southeastern section of Iowa is wetter and warmer than most in the state.

In general, winters are mild with infrequent heavy storms. Winter ice storms are common with one or two destructive ice storms each year (USACE 1985). Annual average precipitation is about 35 inches. The average temperature in winter is 25 degrees Fahrenheit (°F) and the average summer temperature is 73°F. The average length of the growing season is 183 days, with the last killing frost occurring on about May 9 and the first frost occurring on about October 18. IAAAP is in an area of moderate tornado frequency as determined by the U.S. Weather Service (Mason & Hanger Corporation 1991). Monthly weather parameters collected by the U.S. Weather Service (www.weather.com 2017) for Middletown, Iowa are shown in Table 3.2.6.

Table 3.2.6 Summary of Middletown, Iowa Climate Data

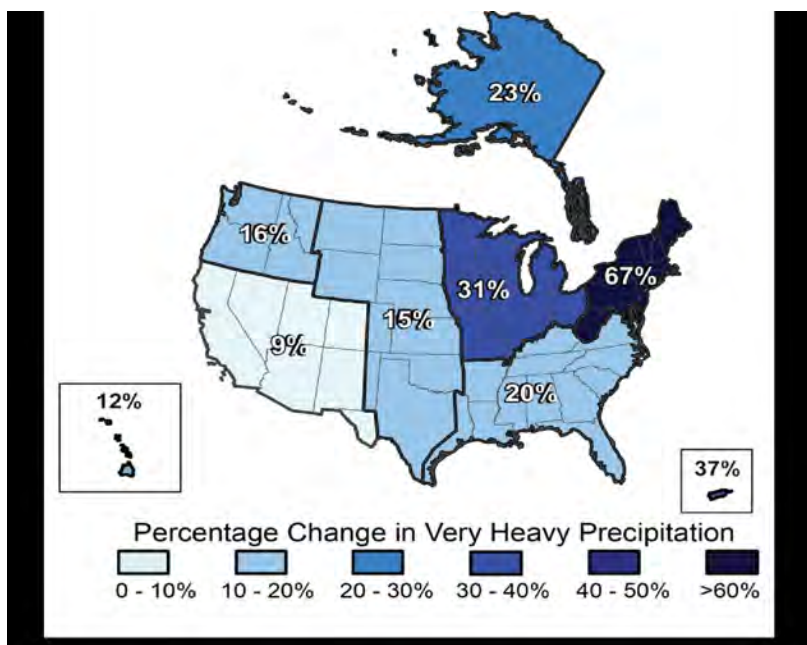
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Avg. High	30°F	36°F	49°F	62°F	72°F	82°F	85°F	83°F	76°F	65°F	49°F	35°F
Avg. Low	15°F	21°F	31°F	43°F	54°F	63°F	67°F	65°F	57°F	46°F	33°F	21°F
Mean	23°F	29°F	40°F	53°F	63°F	73°F	76°F	74°F	67°F	56°F	41°F	28°F
Avg. Precip.	1.31 in	1.61 in	2.96 in	3.61 in	4.40 in	4.45 in	4.48 in	3.86 in	3.60 in	2.91 in	2.72 in	2.10 in
Record High	70°F 1989	72°F 1976	88°F 1986	92°F 1986	94°F 1987	104°F 1988	103°F 2005	105°F 1983	101°F 2000	93°F 2006	79°F 2000	71°F 1998
Record Low	-23°F 1977	-26°F 1996	-6°F 1978	11°F 1982	29°F 1976	40°F 1977	46°F 1971	42°F 1986	30°F 1984	18°F 1972	-2°F 1977	-20°F 1989

3.2.6.1 Climate Change

Iowa is already experiencing the effects of climate change (ICCIC 2011). Iowans are living with warmer winters, longer growing seasons, warmer nights, higher dew-point temperatures, increased humidity, greater annual streamflows, and more frequent severe precipitation events than were prevalent during the past 50 years (ICCIC 2011). In response, the Iowa Climate Change Impacts Committee (ICCIC) was established in 2009 by Iowa Code section 473.7. The Committee was tasked with reviewing climate change impacts and policies for Iowa and submitted their findings to the Governor on 1 January 2011. Their findings and recommendations are summarized below (directly from the report – ICCIC 2011).

Precipitation

- Increases in extreme precipitation events (more than 1.25” in a single day) is resulting in increased flooding.
- Increase of 8 percent more precipitation from 1873 to 2008.
- A larger precipitation increase in eastern Iowa than in western Iowa.



Increase in extreme precipitation events (>1.25”/day) in the US.

Climate change has regional implications for Iowa and the Midwest. Shown here is the increase in very heavy precipitation in different regions of the US from 1958 to 2007. Very heavy precipitation is defined as the heaviest 1% of all events (graph from ICCIC 2011; data from Karl et al. 2009).

Precipitation in Iowa has gradually increased over the last 100 years, although year-to-year variability is high. Eastern Iowa has a higher upward trend than the statewide average. However, there has been a change in “seasonality”: most of the precipitation increase has come in the first half of the year, and less in the second half, leading to wetter springs and drier autumns. Trends toward more precipitation and changed seasonality, as well as higher increases in eastern Iowa, are projected to continue (IPCC 2007).

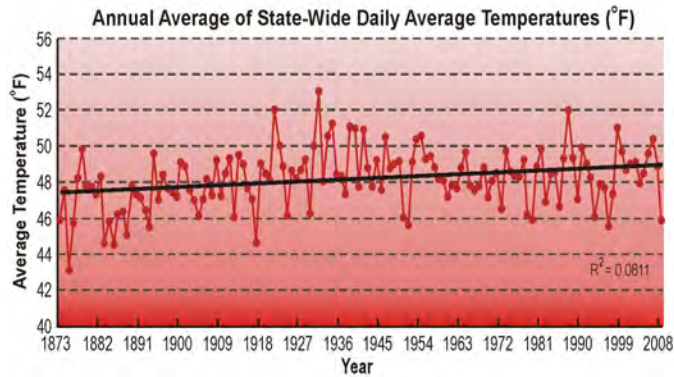
However, for a given amount of rainfall, summertime precipitation has a higher probability of creating flood events than does springtime precipitation. This increased probability can be explained by the seasonal change in alignment of storm tracks passing over the state. Spring (March - May) storms tend to track SW-NE across the state, but summer storms have a more west-to-east orientation, occasionally shifting to a NW-SE track in late summer (Tackle 1995). Tracks of storm cells align more closely with river basins in central and eastern Iowa in summertime than they do in spring. Thus, summertime storms have the potential to dump much larger amounts of rain in a given river basin, and also have a greater probability of causing flooding. Iowa’s recent rise in the number of large summertime rainfall events (those exceeding 1.25 inches) further increases the probability of summertime floods.

Higher winter and spring temperatures seem to be causing earlier and more protracted snowmelt, leading to a reduced probability of spring flooding, while changes outlined in the previous paragraph have led to increased summer flooding. This seems to be the new norm for seasonal flood occurrence in the state.

Higher Temperatures

- Long-term winter temperatures have increased six times more than summer temperatures.
- Nighttime temperatures have increased more than daytime temperatures since 1970.
- Iowa’s humidity has risen substantially, especially in summer, which now has 13 percent more atmospheric moisture than 35 years ago as indicated by a 3-5°F rise in dew-point temperature. This higher dew-point fuels convective thunderstorms that provide more summer precipitation. This extra moisture in the air, soils, and in precipitation also explain why summer daytime temperatures have not increased as rapidly as nighttime and winter temperatures (i.e., additional moisture suppresses surface heating).

Since 1873, Iowa’s annual average temperature has increased at a rather modest rate, but seasonal and day-night changes are proportionately larger and have higher impacts. Temperatures have increased six times more in winter (0.18°F/decade) than in summer (0.03°F/decade), and nighttime temperatures have been increasing more than daytime temperatures (ICCIC 2011). Iowa now has a statewide average of five more frost free days per year than 50 years ago, and 8 to 9 more than at the beginning of the 20th century. This provides Iowa with a longer growing season, earlier seasonal snowmelt, and longer ice-free period on lakes and streams (ICCIC 2011).



Annual average of Iowa state-wide daily average temperatures (°F) from 1873-2008.

Note the increase in the first half of the 20th century and little change since then. Seasonal and day-night changes are proportionately larger and have greater impacts – with winter and nighttime temperatures increasing more than summer and daytime temperatures. (Graph from ICCIC 2011; Data from Iowa Climatology Bureau 2010).

Global and regional climate models predict that Iowa’s annual average temperatures can be expected to continue to increase as they have in recent years (IPCC 2007). These models – which 20 years ago correctly projected polar regions to warm more than equatorial regions, minimum daily temperatures to rise more than maximum temperatures, and US winter temperatures to increase more than summer temperatures – indicate that the current trends likely will continue.

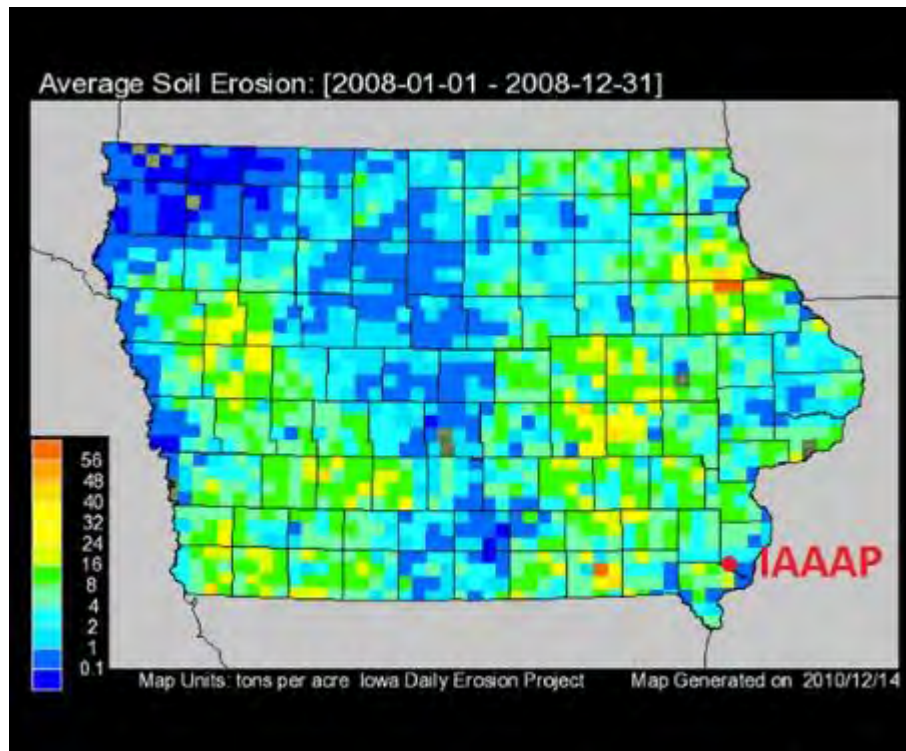
Agricultural Challenges

- Climate extremes, not averages, have the greater short-term impact on crop and livestock productivity.
- Increased soil erosion and water runoff.
- Increased challenges associated with manure applications.
- Favorable conditions for survival and spread of many unwanted pests and pathogens.

Recent weather events and climatic trends are stressing agriculturally related resources. Increased rainfall, and frequency of much heavier-than-normal rainfall events, result in disproportionately negative impacts on soil and water resources and on crop production. Increasing dew-point temperatures and reduced wind flow have potential near-term crop-disease impacts. Subsurface drainage is increasingly necessary to maintain acceptable crop yields. Elevated precipitation and early season rainfall increasingly delay planting, increase nitrate nitrogen losses, and affect nitrogen fertilizer application timing.

Any increase in temperature, especially during nighttime, reduces corn yield by shortening the time in which grain is accumulating dry matter (the grain fill period). According to Takle (2011), Iowa’s nighttime temperatures have been increasing more rapidly than daytime temperatures. In 2010, corn yield forecasts dropped from 179 to 169 bu/acre due to warm temperatures during the grain fill period (Elmore 2010). By mid-century, warmer and drier conditions are expected to decrease crop yields.

The increased intensity and amount of rainfall during 2008 resulted in a soil loss of more than 50 tons per acre in some townships. This contrasts with the “tolerable average” of 5 tons/acre/year). The rise in the intensity and amount of rainfall have increased the erosive power of Iowa’s precipitation (Graph from ICCIC 2011; data from Iowa Daily Erosion Project 2010).



Average soil loss in Iowa in 2008.

High temperatures have been shown to reduce summer milk production, impair immunological and digestive functions of animals, and increase mortality rates among dairy cattle (Klinedinst et al. 1993, Nienaber and Hahn 2007, Mader 2003). On days when the ambient temperature exceeds 90°F, the risk of sow mortality doubles (Carlton 2004). In 1992, 1995, 1997, 1999, 2005, and 2006, the loss of cattle during extended heat episodes exceeded 100 head for some Midwestern farms (Backlund et al. 2008). In 1995, livestock-related economic losses due to heat stress were estimated to be \$31 million in Iowa alone (Hahn et al. 2001).

In general, domestic livestock can adapt to gradual changes in environmental conditions; however, extended periods of exposure to extreme conditions greatly reduce productivity and are potentially life-threatening. During adverse heat events, management alternatives, such as the use of bedding in winter or sprinklers in summer, need to be considered (Mader et al. 2009).

Habitat Changes

- Plants are leafing out and flowering sooner.
- Birds are arriving earlier in the spring.
- Particular animals are now being sighted farther north than in the past.

The flora and fauna of the Upper Midwest have changed constantly in the last 2.6 million years, as glaciers repeatedly advanced and retreated and global temperatures fluctuated by as much as 18° F (Lowe and Walker 1997). Animal and plant species moved to more favorable regions, some new species evolved, and others went extinct (Berendzen et al. 2010). Human caused climate change will have the same general

effect, except that the changes will be faster and they will be unidirectional (representative of warmer climates) rather than cyclical (Tackle 2011). Animals and plants living now will have a more difficult time moving to suitable habitat due to the fragmentation of habitats by our extensive fields, roads, and cities (Walther et al. 2002).

Scientists have reviewed 1,598 animal and plant studies from all over the world. Fifty-nine percent showed changes in their timing of important events, such as earlier spring migration or nesting of birds (Parmesan 2006). In the longest-running studies on the timing of life cycles, spanning hundreds of years, the recent nature of climate warming is particularly evident. In Japan, the timing of cherry blossoms has been recorded since the year 1400. Blossom time was stable until 1952, then began to advance earlier each spring (Menzel and Dose 2005). Similarly, grape harvest dates in Europe going back 500 years show significantly earlier harvests during the last 50 years (Menzel 2005).

A recent study by the Wisconsin Department of Natural Resources modeled the effects of climate warming on the distribution of 50 stream fish species in Wisconsin (Lyons et al. 2010). Water temperature is a key factor in determining the geographical range of fish; changes of only a few degrees can result in major shifts in abundance and survival. With a warming climate, 23 of the species were predicted to decline in distribution and abundance in the future, 23 were predicted to increase, and four had no change (Lyons et al. 2010). All three cold-water species in Wisconsin, including the game fish brook and brown trout, 16 cool-water species, and four warm-water species, were predicted to decline. All species predicted to increase in distribution and abundance were warm-water species, including game fish such as the largemouth bass. The effects of a warming climate on Iowa's stream fishes will be most dramatic in small, geographically isolated headwater streams in the north, which are now dominated by cold and cool-water species (Lyons et al. 2010).

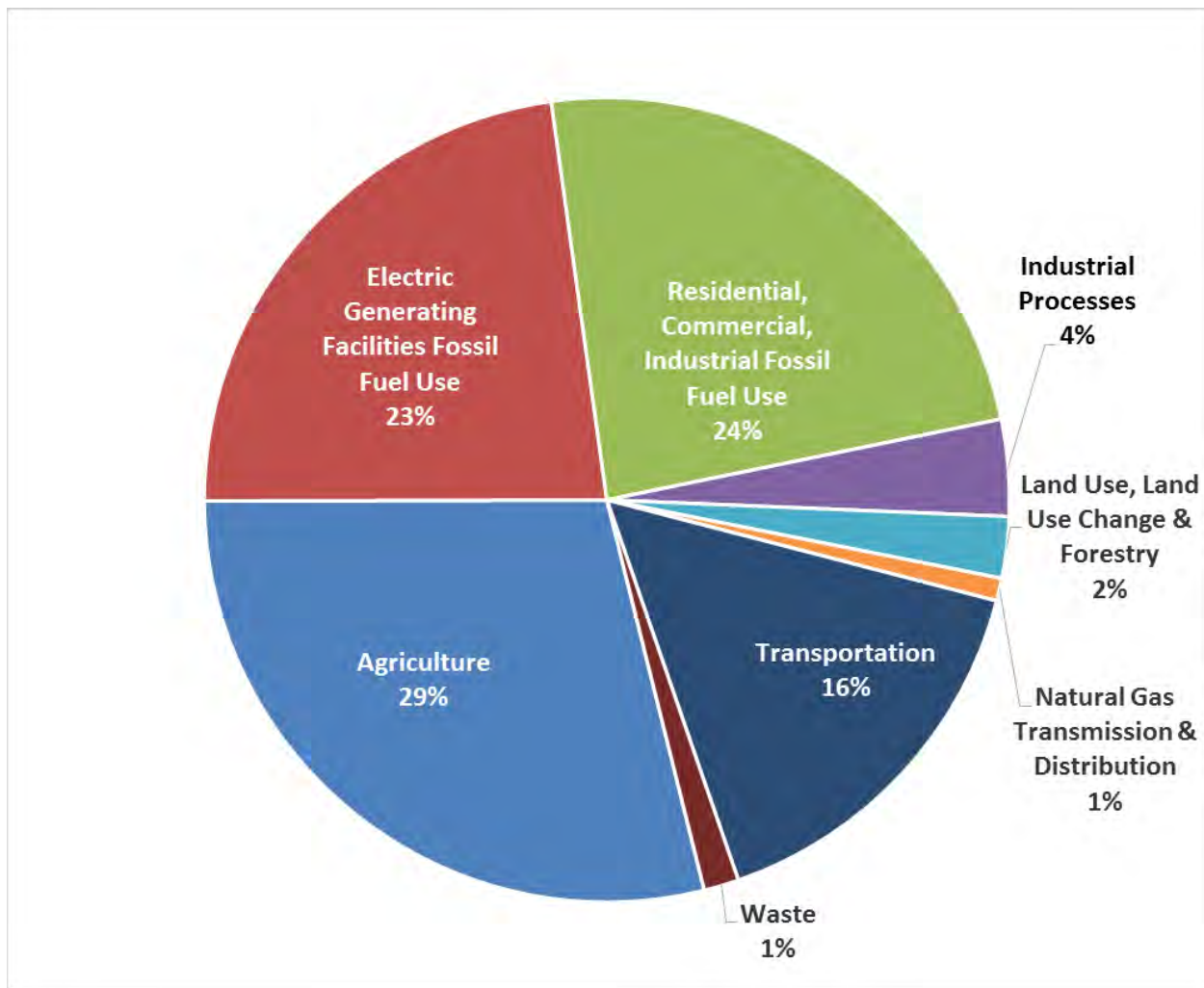
Given the potential for greater streamflows due to increased rainfall, it also makes sense to give rivers more room to flood. Game fish and other animals can survive these floods if we give them room. Greater wetland capacity and wider stream corridors will also reduce downstream flooding and sedimentation, while improving fish and wildlife habitat in normal years (ICCIC 2011).

The following groups of Iowa's wild species are most vulnerable to the effects of today's changing climate (ICCIC 2011):

- 1) Species restricted to cold microclimates such as fens, cold air slopes, and cold-water streams;
- 2) Rare, threatened, or endangered species;
- 3) Specialists that rely on one species of pollinator or host for their survival;
- 4) Declining species, including grassland nesting birds and neotropical migrant birds in general;
- 5) Species that need large blocks of undisturbed forest or prairie;
- 6) Turtles that rely on incubation temperature to determine the sex of the offspring; the sex ratio of their offspring (and thus future reproductive potential) are disturbed by rising temperatures; and
- 7) Turtles and amphibians vulnerable to mid-summer flooding (such as the wood turtle).

Greenhouse Gases

In 2015, total gross Iowa greenhouse gas emissions were 129.05 million metric tons of carbon dioxide equivalents (MMtCO₂e) (IDNR 2016). This is a decrease of 4.42 MMtCO₂e (3.31%) from 2014. Most of this decrease comes from a 3.98 MMtCO₂e reduction from electric generating facilities due to mild weather, decreased electric generation from coal and increased generation from zero-emitting sources such as wind, hydropower and solar. In 2015, 608 MW of new wind generation was installed, 355 MW of coal generating units were converted to natural gas and 131 MW of coal generation was retired (IDNR 2016).



IDNR 2016

Emissions from residential, commercial, and industrial fuel use decreased by 1.85 MMtCO₂e (5.65%). This also helped to offset increases in emissions from agriculture (+2.68%), transportation (+1.72%), waste (+6.78%) and other sectors. Total 2015 statewide GHG emissions were 7.60% lower than their peak in 2007 (IDNR 2016).

The majority of GHG emissions in Iowa in 2015 were from the agriculture sector and from fossil fuel use by electric generating facilities and the residential/commercial/ industrial (RCI) sectors. Together the emissions from electric generation and RCI fuel use account for nearly half (46.82%) of the state's GHG emissions (IDNR 2016).

Agriculture

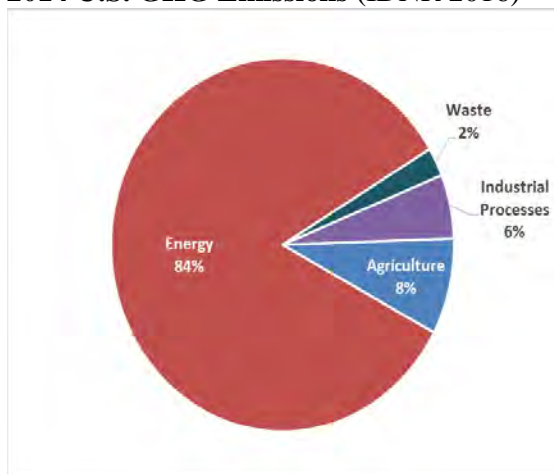
This sector includes GHG emissions from livestock and crop production such as enteric fermentation, manure management, agricultural soils and burning of agricultural crop waste. Enteric fermentation includes emissions from the digestive systems of ruminant animals (IDNR 2016). Emissions from agricultural soils include emissions from animals and runoff, plant fertilizers, plant residues and cultivation of highly organic soils. GHG emissions from fossil-fuel fired agricultural equipment (such as tractors) are

included in the transportation sector. In 2015, agriculture emissions increased 2.68% from the previous year due to increases in both livestock and crop production (IDNR 2016).

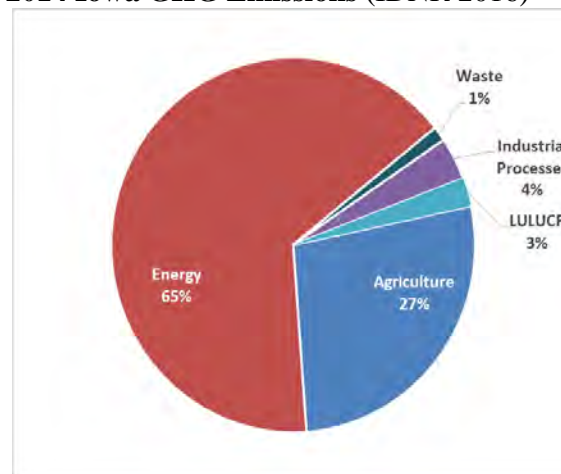
Comparison with U.S. Emissions

For comparison purposes and to be consistent with the sectors in the national GHG inventory, the fossil fuel combustion, natural gas distribution and transmission, and transportation sectors have been combined into one sector called “Energy”. Emissions from 2014 are used for this comparison as the 2015 national GHG inventory has not yet been published (IDNR 2016). Overall, Iowa emitted 1.94% of total 2014 U.S. GHG emissions. Nationally, there were no emissions from the Land Use Land Use Change and Forestry (LULUCF) sector as carbon was stored, not emitted. Agriculture emissions account for a greater percentage of GHG emissions in Iowa than in the total U.S., which is logical given Iowa’s robust agricultural economy (IDNR 2016).

2014 U.S. GHG Emissions (IDNR 2016)



2014 Iowa GHG Emissions (IDNR 2016)



3.2.6.2 DoD Process to Address Climate Change

Climate change will affect the DoD's ability to defend the Nation and poses immediate risks to U.S. national security. As such, the DoD has instructed and provided guidance on how to address climate change in DODM 4715.03 (INRMP Implementation Manual), DODD 4715.21 (Climate Change Adaptation and Resilience (2016)), and by way of the 2014 DoD Climate Change Adaptation Roadmap. The Department is responding to climate change in two ways: adaptation (planning for the changes that are occurring or expected to occur) and mitigation (reducing greenhouse gas emissions). The Department has established three broad adaptation goals:

Goal 1: Identify and assess the effects of climate change on the Department.

Goal 2: Integrate climate change considerations across the Department and manage associated risks.

Goal 3: Collaborate with internal and external stakeholders on climate change challenges.

These goals are supported by four lines of effort:

- 1) **Plans and Operations** include the activities dedicated to preparing for and carrying out the full range of military operations. Also included are the operating environments in the air, on land, and at sea, at home and abroad, that shape the development of plans and execution of operations.
- 2) **Training and Testing** are critical to maintaining a capable and ready Force in the face of a rapidly changing strategic setting. Access to land, air, and sea space that replicate the operational environment for training and testing is essential to readiness.
- 3) **Built and Natural Infrastructure** are both necessary for successful mission preparedness and readiness. While built infrastructure serves as the staging platform for the Department's national defense and humanitarian missions, natural infrastructure also supports military combat readiness by providing realistic combat conditions and vital resources to personnel; this includes natural resources management and INRMPs.
- 4) **Acquisition and Supply Chain** include the full range of developing, acquiring, fielding, and sustaining equipment and services and leveraging technologies and capabilities to meet the Department's current and future needs, including requirements analysis.

Goal 2 (integration) and Effort 3 (infrastructure) are the primary components used to address climate change in INRMPs. In this INRMP, Goal 2 and Effort 3 will be addressed through proposed management strategies for each resource in the following sections, the Land Use Planning process put in place by the installation, and within the IAAAP's Master Plan currently in development.

3.3 Biological Resources

3.3.1 Ecoregion

IAAAP is within the Prairie Parkland (Temperate) Province. Upland forest in this province is dominated by oak (*Quercus* spp.) and hickory (*Carya* spp.) and is part of the oak-hickory forest of the Eastern Broadleaf Forest (Bailey 1995). This extensive ecoregion is found from Canada to Oklahoma and is typified by gently rolling plains with steep bluffs bordering some valleys. Grasses were the dominant native vegetation; however, due to the favorable climate and soils, most tall grass prairie lands were cultivated, and little native vegetation remains, including those areas in and around IAAAP. Native grassland vegetation within this ecoregion was historically dominated by big bluestem (*Andropogon gerardii*), little bluestem (*Schizachyrium scoparium*), switchgrass (*Panicum virgatum*), and Indian grass (*Sorghastrum nutans*) with many species of wildflowers and legumes.

At the regional level, the ecoregion has been further classified for the purpose of water quality assessment and management. This classification places IAAAP within the Southern Iowa Rolling Loess Prairie Ecoregion as it transitions into the Central Irregular Plains Ecoregion (Griffith *et al.* 1994).

Mature landscape in the region provides wintering habitat for passerines and raptors. There are uncommon nesting occurrences of the long-eared owl (*Asio otus*), and dickcissel (*Spiza americana*) reach their greatest abundance in this plain. Many vascular plants found along riparian areas of rivers and streams are species that migrated northward from the Ozark Plateau, such as sycamore (*Platanus occidentalis*). Bats are common in areas that are well dissected by streams and have mature riparian habitat.

3.3.2 Flora

3.3.2.1 Vegetation Types

Vegetative community types on IAAAP are floodplain forest, upland oak-hickory forest, hill prairie, native prairie, wetland, and leased areas (hay, grazing, and row crop areas). Tetra Tech EM Inc. (2001a) recorded a total of 30 semi-natural and natural vegetative community types on the Plant. Major community types include: five pine-dominated forest types, seven upland deciduous forest types, six temporary flooded (bottomland) forest types, one mixed evergreen and deciduous forest type, one evergreen forest type, two shrubland types, and eight types dominated by herbaceous species. Maps showing vegetation types occurring on IAAAP are available in the IAAAP Natural Resources office.

Floodplain Forest

Floodplain forests occur along the floodplains of Long, Brush, and Spring creeks. Dominant species include box elder (*Acer negundo*), black walnut (*Juglans nigra*), black willow (*Salix nigra*), eastern cottonwood (*Populus deltoides*), sycamore, bitternut hickory (*Carya cordiformis*), shagbark hickory (*Carya ovata*), chinquapin oak (*Quercus muhlenbergii*), red oak (*Quercus rubra*), and white oak (*Quercus alba*). Gooseberry (*Ribes* sp.), sedge (*Carex* spp.), trillium (*Trillium* spp.), poison ivy (*Toxicodendron radicans*), and dense tangles of green-briar (*Smilax* sp.) often trace the floodplain margin.

Oak-Hickory Forest

Oak-hickory forests occur predominately on southern, western, and eastern slopes and adjacent rolling uplands of stream valleys. White oak, red oak, chinquapin oak, mockernut hickory (*Carya tomentosa*), shagbark hickory, and bitternut hickory are the major canopy dominants on higher elevated and better-drained sites. Black locust (*Robinia pseudoacacia*), sugar maple (*Acer saccharum*), and wild cherry (*Prunus* spp.) are found on disturbed sites.

Prairies

Hill prairies occur on dry, well-drained silt loam and clay loam soils of steep bluffs and ridge crests and appear as openings in oak-hickory forests. Big bluestem is the dominant species. Other characteristic species of the hill prairie include field pussytoes (*Antennaria neglecta*), a sedge (*Carex medaii*), pale purple coneflower (*Echinacea pallida*), gerardia (*Gerardia grandiflora*), hawkweed (*Hieracium* sp.), slender bush-clover (*Lespedeza virginica*), hoary puccoon (*Lithospermum canescens*), beardtongue (*Penstemon pallidus*), buttercup (*Ranunculus fascicularis*), and gray goldenrod (*Solidago nemoralis*).

Wetlands

Wetlands are discussed in Section 3.3.2.5, *Wetlands*.

Hay and Grazing Areas

Hay and grazing areas are primarily vegetated by tall, smooth brome grass (*Bromus inermis*). There are about 1,500 acres of grazing and 5,500 acres of row crop/hay outleases on IAAAP, although acreages change annually.

Agricultural Areas

The primary agricultural crops are corn and soybeans. Other crops include alfalfa hay and small amounts of wheat and oats. There are about 5,500 acres of agricultural row crop/hay outleases on IAAAP, although acreages change annually.

3.3.2.2 Floral Inventory

Plant communities present on IAAAP are typical of the ecoregion. Horton *et al.* (1996) identified 503 species of vascular plants on IAAAP, representing 97 families and 303 genera. Species richness on IAAAP

for vascular plants is 26% of those recorded statewide by Eilers and Roosa (1994, as reported by Horton *et al.* 1996). A vegetative communities planning level survey was performed at IAAAP during 1999 and 2000 (Tetra Tech EM, Inc 2001a), and an invasive species survey was performed at IAAAP in 2003 (Tetra Tech EM, Inc 2003). The Natural Resources Manager maintains a list of flora known to occur on IAAAP.

The Natural Resources Management Plan (Mason & Hanger Corporation 1991) contains results of a 1974 to 1978 forest inventory for 10 timber compartments on IAAAP.

3.3.2.3 Special Status Flora

No federally-listed plant species have been recorded on IAAAP. Six state-listed threatened vascular plant species have been identified on the Plant. Blue ash (*Fraxinus quadrangulata*), Virginia-snakeroot (*Aristolochia serpentaria*), mint (*Blephilia ciliata*), false hellebore (*Veratrum woodii*), slender ladies' tresses (*Spiranthes lacera*), and sharpwing monkey flower (*Mimulus alatus*) are state-threatened species occurring on the installation. The butternut (*Juglans cinerea*), a former federal candidate species, was found on the IAAAP as recently as 1996 (Horton *et al.* 1996), but has not been found in recent years.

The green fringed orchid (*Platanthera lacera*) is a state special concern species documented on IAAAP by Horton *et al.* (1996). Only two populations of this species are known to exist in Iowa, the second being in Lee County. Southern Adder's-tongue fern (*Ophioglossum vulgatum*), a species also discovered by Horton *et al.* (1996), is also a state special concern species and IAAAP is the only known location for this species in Iowa.

The western prairie fringed orchid (*Platanthera praeclara*) (federally-listed threatened and state-listed threatened) and the prairie bush clover (*Lespedeza leptostachya*) (federally-listed threatened and state-listed threatened) have a potential to occur statewide based on historical records and habitat distribution. These species are not known to occur on IAAAP.

3.3.2.4 Areas of Special Interest

Wetlands are of special interest on IAAAP. Wetlands are discussed in Section 3.3.2.5, *Wetlands*.

3.3.2.5 Wetlands

The U.S. Congress enacted the CWA in 1972 to *restore and maintain the chemical, physical, and biological integrity of the Nation's waters*. Section 404 of the CWA delegates jurisdictional authority over wetlands to the USACE and the USEPA. Waters of the United States protected by the CWA include rivers, streams, estuaries, and most ponds, lakes, and wetlands. The USACE and the USEPA jointly define wetlands as.. *areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.*

The USFWS defines wetlands to include a variety of areas that fall into one of five categories:

- areas with hydrophytes and hydric soils, such as those commonly known as marshes, swamps, and bogs;
- areas without hydrophytes but with hydric soils, such as flats where drastic fluctuation in water levels, wave action, turbidity, or high concentration of salts may prevent the growth of hydrophytes;
- areas with hydrophytes but nonhydric soils, such as margins of impoundments or excavations where hydrophytes have become established but hydric soils have not yet developed;
- areas without soils but with hydrophytes, such as the seaweed-covered portion of rocky shores; and

- wetlands without soils and without hydrophytes, such as gravel beaches or rocky shores without vegetation.

Wetland functions and values include but are not limited to ground water recharge, ground water discharge, flood flow alteration, sediment stabilization, sediment or toxicant retention, nutrient removal or transformation, production export, wildlife diversity/abundance, aquatic diversity/abundance, uniqueness/heritage, and recreation. Executive Order 11990, *Protection of Wetlands* (1977) and the CWA (1977) require no net wetland losses on federal lands in the United States.

In 1992, the Soil Conservation Service conducted a preliminary wetlands investigation on IAAAP by aerial survey. This delineation met the needs of the installation natural resources program in terms of location of wetlands. The findings of the preliminary investigation indicated about 600 acres of wooded wetlands. In general, these are within floodplains of Long, Brush, and Spring creeks (palustrine wetlands) and/or are associated with impoundments (lacustrine wetlands). Findings were delineated on aerial photographs, but wetlands were not classified. Non-wooded wetlands are typically dominated by tall perennial grasses, such as bur-reed (*Sparganium eurycarpum*), reed canary grass (*Phalaris arundinacea*), arrow root (*Sagittaria* sp.), water plantain (*Alisma triviale*), pond weed (*Potamogeton* sp.), duck weed (*Lemna* sp.), smartweed (*Polygonum* sp.), and a variety of sedges.

In 1999, a National Wetlands Inventory was conducted on IAAAP by the USFWS (Swords *et al.* 1999). IAAAP contains 113.2 acres of wetland. Forested wetlands are the dominant type, representing about 50 percent of the installation's wetlands. The next most common type is unconsolidated bottom wetlands (ponds), which comprise about 24 percent of the wetlands on the installation. IAAAP contains 57.3 miles of linear wetlands including rivers and streams (3.1 miles of wetlands and 54.2 miles of rivers and streams respectively). Wetland acreages are as follows: Emergent Wetland – 14.7 acres, Scrub/Shrub Wetland (Broad-leaved Deciduous) – 10.8 acres, Forested Wetland – 60.2 acres (Temporarily Flooded – 56.5 acres and Seasonally Flooded – 3.7 acres), and Unconsolidated Bottom – 27.5 acres (Swords *et al.* 1999). Maps showing wetlands and deepwater habitats on the Plant are available in the IAAAP Natural Resources office.

3.3.3 Fauna

3.3.3.1 General

IAAAP's wildlife species include animals indigenous to the Southern Iowa Drift Plain. Surveys on IAAAP have documented the occurrence of 37 mammal species, 127 bird species, 16 reptile species, 10 amphibian species, 11 species of mollusks, 20 species of dragonflies, and 15 species of damselflies (Tetra Tech EM, Inc 2001b). In addition, 33 fish species have been documented on the Plant. Tetra Tech EM, Inc (2001b) performed a fauna planning level survey on IAAAP in 2000. The Natural Resources Manager maintains a list of fauna known to occur on IAAAP.

Mammals

Mammals known to occur on IAAAP include the white-tailed deer, eastern cottontail (*Sylvilagus floridanus*), eastern fox and eastern gray squirrel (*Sciurus niger* and *S. carolinensis*), raccoon (*Procyon lotor*), coyote (*Canis latrans*), red and gray fox (*Vulpes vulpes* and *Urocyon cinereoargenteus*), bobcat (*Lynx rufus*), river otter (*Lontra canadensis*), beaver (*Castor canadensis*), striped skunk (*Mephitis mephitis*), opossum (*Didelphis virginiana*), American badger (*Taxidea taxus*), muskrat (*Ondatra zibethica*), and woodchuck (*Marmota monax*).

Birds

Birds commonly found on IAAAP include the wild turkey (*Meleagris gallopavo*), northern bobwhite quail (*Colinus virginianus*), American woodcock (*Philohela minor*), American crow (*Corvus brachyrhynchos*), turkey vulture (*Cathartes aura*), red-tailed hawk (*Buteo jamaicensis*), mourning dove (*Zenaidura macroura*), red-headed woodpecker (*Melanerpes erythrocephalus*), American robin (*Turdus migratorius*), European starling (*Sturnus vulgaris*), northern cardinal (*Cardinalis cardinalis*), song sparrow (*Melospiza melodia*), red-winged blackbird (*Agelaius phoeniceus*), eastern meadowlark (*Sturnella magna*), and American goldfinch (*Carduelis tristis*).

Fish

Fish species commonly found on the Plant include the yellow and black bullhead (*Ameriurus natalis* and *A. melas*), green sunfish (*L. cyanellus*), largemouth bass (*Micropterus salmoides*), bluegill (*Lepomis macrochirus*), channel catfish (*Ictalurus punctatus*), central stoneroller (*Camptostoma anomalum*), spotfin shiner (*Cyprinella spiloptera*), common shiner (*Luxilus cornutus*), bigmouth shiner (*Notropis dorsalis*), suckermouth minnow (*Phenacobius mirabilis*), and creek chub (*Semotilus atromaculatus*).

Reptiles and Amphibians

Reptiles occurring on the Plant include the snapping turtle (*Chelydra serpentina*), western painted turtle (*Chrysemys picta*), black rat snake (*Elaphe obsoleta*), northern water snake (*Natrix sipedon*), brown snake (*Storeria dekayi*), western spiny softshell (*Trionyx spinifer*), eastern hognose snake (*Heterodon platyrhinos*), blue racer (*Coluber constrictor*), and eastern (redside) garter snake (*Thamnophis sirtalis*). Amphibians occurring on IAAAP include the American toad (*Bufo americanus*), northern spring peeper (*Hyla crucifer*), gray treefrog (*H. chrysoscelis*), Blanchard's cricket frog (*Acris crepitans*), western chorus frog (*Pseudacris triseriata*), bullfrog (*Rana catesbeiana*), green frog (*R. clamitans*), Plains leopard frog (*R. blairi*), and pickerel frog (*R. palustris*).

Mollusks

Gastropods identified on IAAAP include *Physa* species, *Fossaria* species, *Planorbella* species, and unidentified *succinid* species. Unidentified shells of Sphaeriacean clams have been found, and eleven species of mussels have been documented on IAAAP. These include: the creeper (*Strophitus undulatus* AKA: Squawfoot, strange floater), fatmucket (*Lampsilis siliquoidea*), giant floater (*Pyganodon grandis*), lilliput (*Toxolasma parvus*), mapleleaf (*Quadrula quadrula*), plain pocketbook (*Lampsilis cardium*), pocketbook (*Potamilus capax*), pondmussel (*Ligumia subrostrata*), three-ridge (*Amblema plicata*), white heelsplitter (*Lasmigona complanata*), and the rainbow mussel (*Villosa iris*). To our knowledge, this is the only recent occurrence of the rainbow mussel in Iowa.

Insects

Thirty-five species of dragonflies and damselflies have been recorded on IAAAP. Various other insects and invertebrates, such as worms, beetles, and grubs, are common on IAAAP (Chenger 2003).

3.3.3.2 Special Status Fauna

The Indiana bat (*Myotis sodalis*) (federally-endangered) and northern long-eared bat (*Myotis septentrionalis*) (federally-threatened) are the only federally-listed species known to occur on IAAAP. Tetra Tech EM, Inc. (1998) captured two lactating Indiana bats on IAAAP, and radio tracking of these individuals indicated they forage on IAAAP. One northern long-eared bat was also captured during this survey. In 2003, an additional survey was conducted by Bat Conservation and Management Inc. (BCM). BCM captured six Indiana bats, and radio-tracking recorded the bats day roosting in trees at IAAAP. BCM also captured five northern long-eared bats (Chenger 2003). Although foraging and potential roosting habitat

at IAAAP may comprise only a relatively small fraction of the Indiana and northern long-eared bat's total summer ranges and is not considered to be "critical" (i.e., not listed in the September 24, 1976 Federal Register (FR) (41 FR 41914) as habitat essential to the conservation of the species and requiring special management considerations or protection), the U.S. Army understands that this habitat is important to the local population and potentially to the long-term survival of these species. An Endangered Species Management Plan (Stantec 2015) has been prepared for the Indiana and northern long-eared bat on IAAAP (see Section 4.8.1, *Federally-listed Species Management Practices*).

The federally-delisted bald eagle (*Haliaeetus leucocephalus*) occurs at IAAAP as transients during the migratory period. They can be observed foraging on the Plant and are occasionally found at Mathes Lake. A bald eagle nest is located about two miles from IAAAP on the Skunk River. This nest is not used on an annual basis. The bald eagle is a state-listed special concern species.

Tetra Tech EM, Inc (2001b) observed the Henslow's sparrow (*Ammodramus henslowii*) (state-listed threatened) at IAAAP along the eastern edge of Yard K.

The USFWS (Milligan and Grady 1996) performed a comprehensive drainage basin survey on IAAAP in 1987, which documented the orangethroat darter (*Etheostoma spectabile*) (state-listed threatened) in Brush and Spring creeks. Horton *et al.* (1996) confirmed these findings. A recreational use assessment survey performed by IDNR in 2007 of an unnamed creek in the southwestern portion of the Plant also documented the orangethroat darter (IDNR website 2011).

The western worm snake (*Carphophis amoenus vermis*) (state-listed threatened) was recorded on IAAAP in 1979 by the USFWS. Army regulations require consideration of state-listed species in all Army actions.

3.4 Human Environment

3.4.1 Cultural Resources

Cultural Resources include, but are not limited to, buildings, structures, prehistoric and historic archeological sites, native sacred sites, and cemeteries.

3.4.1.1 Cultural Resources Inventory

Archeological surveys performed on IAAAP revealed that 13,836 acres of the Plant have potential to yield archeological resources. Surveys found that other areas had been disturbed and do not require additional study (IAAAP 2000). To date, over 340 known sites have been recorded on IAAAP, yielding prehistoric, historic, and combination sites. For many of these sites, eligibility for listing in the National Register of Historic Places (NRHP) has not been determined, and their evaluations remain to be completed.

Under the 2006 Program Comments in Appendix 3.4.1.1, the Army has complied with its responsibilities under Sections 106 and 110 of the National Historic Preservation Act with regard to the effect(s) of the following management actions on World War II (WW II) and Cold War Era Army Ammunition Production Facilities and Plants: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, closure of such facilities and is not eligible as a historic district. The Army has complied with Sections 106 and 110 of the National Historic Preservation Act, and as such, consultation on such action(s) is not required. A list of specific IAAAP structures covered by the 2006 Program Comments is available for review at the IAAAP.

IAAAP has over 1,190 architectural resources. A preliminary reconnaissance-level survey indicated that 402 buildings from the World War II and Cold War periods may be eligible for listing in the NRHP. However, a historic context would be required before a formal determination of eligibility can be made.

There are no cultural resources formally listed on the NRHP or nominated to it, and no potential traditional cultural properties have been identified on IAAAP. IAAAP has an Integrated Cultural Resources Management Plan (Earth Tech, Inc. 2002).

3.4.1.2 National Register of Historic Places Eligibility

Eligibility of archeological sites for inclusion on the NRHP is the principal criterion determining management prescriptions. Generally, sites fall into one of three categories with regard to NRHP eligibility.

- **Eligible:** These sites have been determined eligible for the NRHP and therefore are subject to protection. They should not be affected without consultation per Section 106 of the National Historic Preservation Act and development of a plan to mitigate adverse effects.
- **Ineligible:** These sites have been determined ineligible for the NRHP and do not require protection from adverse effects.
- **Potentially eligible:** Further investigation is required to determine NRHP eligibility. Therefore, these sites are potentially eligible for the NRHP and require protection until determinations of eligibility can be made.

No IAAAP buildings that predate the establishment of the installation have been surveyed. The evaluation of these structures and some Cold War era buildings has not been completed.

3.4.2 Land Uses

The Plant mission determines land use patterns in the vicinity of production and storage areas on IAAAP. Outlying lands are used for a variety of purposes, including agriculture, wildlife habitat, and forest land. Table 3.4.2 shows primary land use categories and acreage (IAAAP 2012). An individual tract of land may have multiple uses occurring in the same tract. IAAAP vegetation coverage and land uses are highly variable, and uses overlap one another.

Table 3.4.2 IAAAP Land Use Categories and Acreage

Primary Use	Acreage*
Agricultural Outlease	7,500
Improved Grounds	3,758
Semi-improved Grounds	100
Unimproved/Other	7,766
Total	19,024

* Acreages are approximate

Agricultural Outlease

Agricultural outleases comprise a major portion of acreage on IAAAP. The installation has 56 row crop, hay, and grazing leases on about 7,500 acres. Leases include 46 row crop (including one for hay production only) and 10 grazing and hay leases. Agricultural outleases are discussed further in Section 4.10.

Improved Grounds

IAAAP has about 3,758 acres of improved grounds including pavement, buildings and structures, and ammunition storage. These acres include eight munitions storage yards (earth covered magazines or igloos), 12 production lines, a family housing unit, administrative headquarters, training, utility, and storage areas.

Semi-improved Grounds

There are about 100 acres of semi-improved grounds on IAAAP consisting of administrative lawns, ball fields, drill fields, and cemeteries that require annual grounds maintenance. Shilo Cemetery is the only remaining active cemetery on IAAAP. IAAAP transferred ownership of the installation housing area, including 42 structures and 112 acres, to the city of Middletown in 1997.

Unimproved/Other

There are about 7,766 acres of unimproved grounds on IAAAP. This acreage consists of forest land that requires little or no maintenance.

Wildlife Habitat

Wildlife habitat consists primarily of the acreage considered agricultural outlease and unimproved grounds (15,266 acres) on IAAAP, including forest areas and ponds, lakes, and streams. These areas are maintained as wildlife habitat and buffer.

Hunting and Fishing Areas

Areas open to hunting on IAAAP are scattered throughout the Plant. Figure 3.4.2 shows areas open to recreational use on IAAAP. Recreation units consist of about 775 acres each.

Fishing is permitted only on the 83-acre George H. Mathes Lake (#18), Stump Lake (#19), the emergency water reservoir (#22), North Stump Lake Pond (#23), Red Rock Pond (#46), and four other ponds: #04, #23, #32, and #40. All recreational users are required to meet licensing requirements specified in IAAAP Regulation 420-1. Not all ponds are illustrated on Figure 3.4.2.

3.4.3 Facilities and Utilities

3.4.3.1 Overview

Most of IAAAP is undeveloped rural area, comprised primarily of buffer areas surrounding storage and production areas. Unimproved grounds (lakes, roads, buildings, land not available for development, etc.) account for most of IAAAP's land. Land area descriptions are discussed in Section 3.4.2, *Land Uses*. IAAAP is an industrial complex with production areas, storage areas, a 500-acre test fire area, a 40-millimeter test range (planned for development), a maintenance area, and a cantonment area.

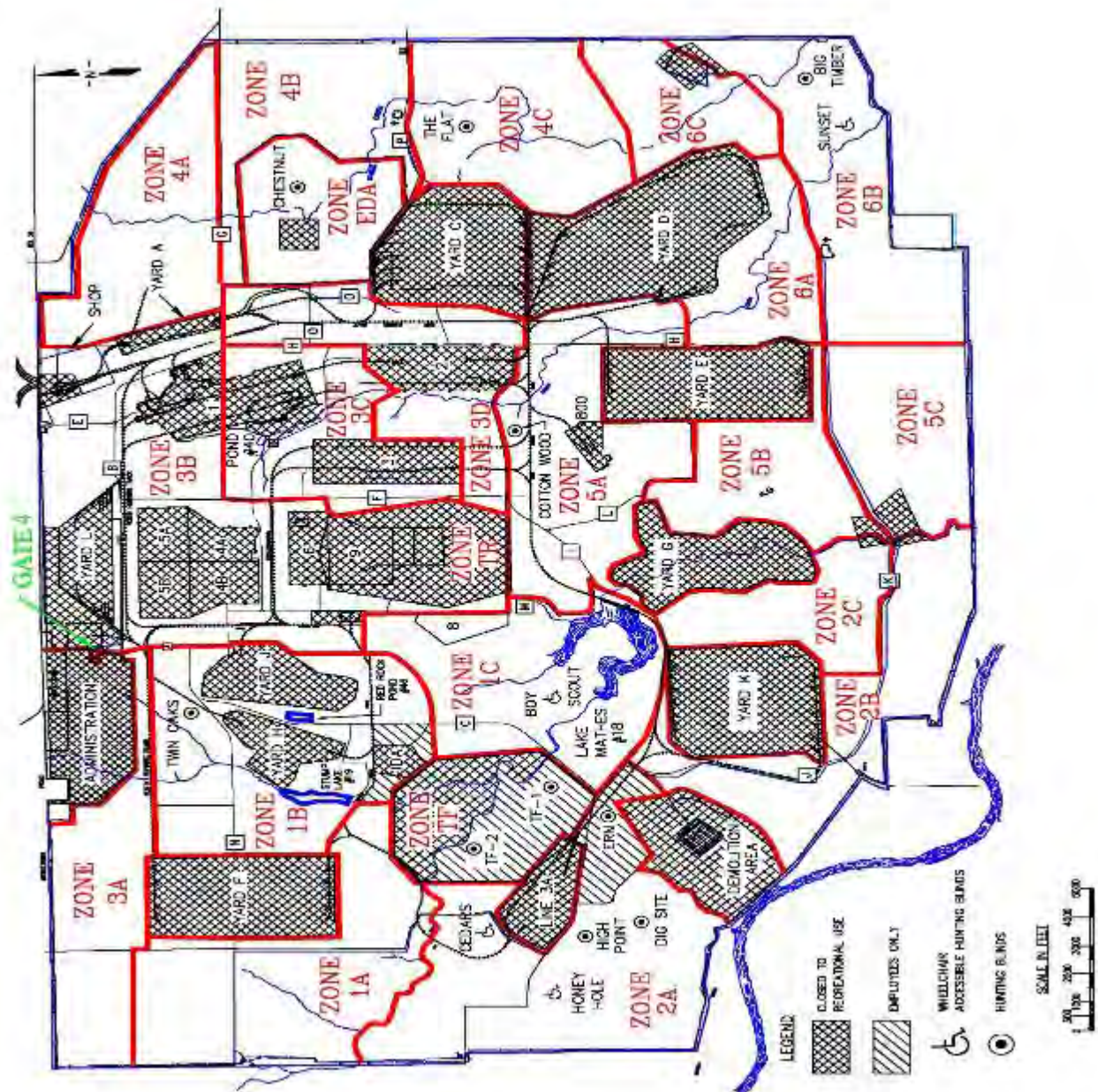
3.4.3.2 Transportation System

Road System

U.S. Highway 34, which runs along part of the northern border, is the major east-west highway near IAAAP. The closest major north-south highway is U.S. Highway 61. U.S. Highway 61 is the main highway between Fort Madison and Burlington. It intersects with U.S. Highway 34 in Burlington. State Highway 16 crosses the state east to west and intersects U.S. Highway 61 just south of the Plant.

IAAAP has 120 miles of roads within its boundaries; about 48 miles of hard-surface paved roads, 60 miles of gravel-surfaced roads, and 12 miles of graded roads (IAAAP 2013). About 14 miles of gravel roads have been maintained using agricultural funding over the last few years to provide access to agricultural areas on IAAAP.

Figure 3.4.2 Recreational Areas on Iowa Army Ammunition Plant



Railway System

IAAAP's railway system interconnects with the Burlington Northern Railroad at the northern installation boundary. There are about 102 miles of rails and railcar storage area within the installation (IAAAP 2012).

Airports

The nearest airport is the Burlington Municipal Airport, located on the southern edge of Burlington. The next nearest airport is in Galesburg, Illinois. The closest local service airports are Fort Madison and Mount Pleasant, Iowa.

3.4.3.3 Water Supply

Water is purchased under a long-term contract with the Burlington Regional Water Works, which draws eighty percent of its water from the Mississippi River. The Burlington Municipal Water Works has the capacity to treat 15 million gallons per day. Its peak demand, which occurs in summer, is about 12 million gallons per day. Water is pumped to the City of Burlington's distribution center from the water treatment plant. The water is then pumped to a series of storage towers. IAAAP has three 100,000-gallon storage towers. Water is distributed throughout the facility using two electrical pumps with a diesel backup.

Prior to 1977 water was obtained from George H. Mathes Lake and treated at a waterworks on the installation (USACE 1985). These systems are no longer operational. IAAAP's distribution center wheels water to Middletown through a meter in the administration area. Middletown has a storage capacity water system. The installation wheels water to the city of Danville (USACE 1985).

3.4.3.4 Waste Water System

IAAAP has two sewage treatment plants. The main wastewater treatment plant consists of a two-stage high rate trickling filter plant, which includes primary and final settling with separate digestion and rotary distributors. It has a capacity of treating 800,000 gallons per day.

3.4.3.5 Range Facilities

IAAAP has a test fire area comprised of a horizontal range, vertical stand, and active test firing. IAAAP has one small arms range, a demilitarization operation area, and a number of igloos-magazines used for munitions storage.

3.4.3.6 Projected Changes to Facilities

Upgrading, modernization, centralization, and 'right-sizing' of facilities is ongoing at IAAAP. The primary changes projected to occur on the facility involve the demolition or revitalization of various vacant buildings on the IAAAP. Buildings that are not anticipated for future use will be demolished; this could include removal of infrastructure (e.g., roads, utilities) that support those buildings. Building renovations/updating will be based on mission needs and the ARMS (Armament Retooling and Manufacturing Support) program. The ARMS program is designed to encourage commercial use of the Army's Active Ammunition Plants / Depots through various incentives for businesses willing to locate to a government facility. Facilities changes are also discussed in Section 3.1.5.4, *Effects of the Military Mission on Natural Resources*.

3.4.4 Hazardous and Toxic Materials

Past construction and production activities at IAAAP have resulted in some areas being contaminated. These activities and restoration efforts are discussed in Section 3.1.5.4, *Effects of the Military Mission on Natural Resources*.

3.4.5 Outdoor Recreation

IAAAP is a large, relatively undeveloped, open space. This open space and outdoor recreation opportunities associated with it are perhaps IAAAP's best natural attributes in terms of community quality of life. With ever-increasing time to pursue recreational interests, the IAAAP community and general public will likely place more demand on the Plant's natural resources.

Hunting and fishing are the primary outdoor recreation activities allowed on IAAAP. However, trapping is allowed and mushroom, nut, and berry harvesting is allowed by Plant employees only. Other outdoor recreation activities are not allowed due to safety and security concerns.

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4.0 NATURAL RESOURCES MANAGEMENT

This chapter includes those programs that are implemented specifically for natural resources conservation. Some programs, such as cantonment area management, may be within responsibilities of organizations other than Natural Resources, but items discussed in this INRMP emphasize those facets of these programs that are conducted by the Natural Resources Program.

Programs are described in terms of their status and recent history (**Current Management**) followed by proposed project(s) (**Proposed Management**), if appropriate. These projects are intended to relate implementation of this INRMP to the budget process (see Section 7.5, *Implementation Funding Options*).

Projects are described in a goal(s)-objective(s) format to provide process descriptions that are compatible with adaptive management analyses and overall INRMP implementation monitoring processes. All goals and objectives are summarized in tabular format in Appendix 7.4, *List of INRMP Goals and Objectives*.

Each project has a summary description at the beginning of the Proposed Management section. The format is as follows:

Project: Title

Justification: Laws, regulations, or policy compliance (*e.g.*, participation in regional initiatives; Sikes Act, ESA, AR 200-1, stewardship)

Project Timing: Dates to be accomplished, by objective (*e.g.*, 2013, 2013-15, ongoing)

Regulatory Coordination: Agencies with whom coordination is required

Change from Current Management: Level of significance (if any) from Current Management

4.1 History of Natural Resources Management

Prior to 1974, the Long Creek Conservation Club managed natural resources on IAAAP. IAAAP hired its first land manager in 1974, a contractor employee, to manage the installation's fish and wildlife resources. In 1994, this function was transferred to the government staff due to natural resources being an inherently governmental function, per Sikes Act (16 USC 670, as amended). A cooperative effort between IDNR, USFWS, and IAAAP has resulted in many management programs, such as restocking wild turkey and ruffed grouse (*Bonasa umbellus*) and Canada goose (*Branta canadensis*) and trumpeter swan (*Olor buccinator*) reintroduction programs on the Plant.

4.2 Ecosystem Management Coordination and Planning

4.2.1 Ecosystem Management Coordination

4.2.1.1 Current Management

Natural resources management on military installations must be coordinated with the military mission to support the mission as well as effectively conserve natural resources. At IAAAP this coordination is accomplished by the Natural Resources Manager in cooperation with American Ordnance LLC personnel.

Project planners have increasingly become more active participants in coordination processes on the Plant. IAAAP has developed a Land Use Control Procedures for project planners and managers. It is a 'living document' that delineates the necessary steps planners must take throughout the project planning process. It also specifies issues and/or resources that must be considered as part of a proposed project. The Land Use Control Procedures includes an environmental concerns map delineating locations of, and issues related

to the environmental cleanup program on IAAAP. The Land Use Control Procedures can be found in the Environmental Office.

As discussed in Section 2.3, *Other Federal Agencies*, Section 2.4, *Iowa Department of Natural Resources*, and Section 2.8, *Municipalities*, IAAAP has much in common with other federal and state agencies, and municipalities interested in Iowa ecosystems. Cooperating with other organizations to manage and protect IAAAP and surrounding ecosystems is a significant commitment.

4.2.1.2 Proposed Management

Project: Ecosystem Management Coordination and Planning

Justification: Participation in regional initiatives, stewardship

Project Timing: Ongoing

Regulatory Coordination: None required

Change from Current Management: Moderate; Land Use Control Procedures now standard

Goal 1. Use coordinated planning to manage natural resources to sustain military mission capability.

Objective 1. Coordinate natural resources planning with planning for the sustainment of the military mission.

Objective 2. Adhere to IAAAP Land Use Control Procedures to ensure natural resources are thoroughly considered in the project planning process.

Goal 2. Promote and participate in regional planning for natural resources conservation at scales larger than IAAAP.

Objective 3. Coordinate with and support regional planning and programs.

4.2.2 Integrated Natural Resources Management Planning

4.2.2.1 Current Management

AR 200-1 (Department of the Army 2007) requires the preparation, implementation, and monitoring of an INRMP for each installation. This regulation also requires a regular review of INRMPs by the Army, not less than every five years, with updates, as appropriate. The list of goals and objectives (Appendix 7.4) can be used to guide the review and adjust programs, per the adaptive management process. The next major review is scheduled for FY 22 with implementation to begin in FY 23.

4.2.2.2 Proposed Management

Project: Integrated Natural Resources Management Planning

Justification: Sikes Act compliance, AR 200-1, stewardship

Project Timing: Objective 1 - annually; objective 2 - 2022

Regulatory Coordination: USFWS and IDNR

Change from Current Management: No significant change

Goal. Use coordinated planning to fully integrate the natural resources program at IAAAP.

Objective 1. Internally review this INRMP annually using project goals and objectives to guide reviews; revise projects and budgets as required; review changes with the USFWS and IDNR as appropriate and necessary.

Objective 2. Review and, if needed, update the INRMP at least every five years or when major changes are made to the natural resources program; coordinate this update with the USFWS and IDNR. (This will require the next INRMP review/update to begin in 2022)

4.3 Soils Management

4.3.1 Current Management

IAAAP has a complete soil inventory (Soil Conservation Service 1983). Descriptions of soils on IAAAP are in Section 3.2.4, *Soils*. No additional general soils surveys are required during the next five years.

Protection is the primary mechanism used to manage soil resources on IAAAP. For example, the following principles are followed when facility-siting decisions are made.

- New facilities normally will be sited on lands currently developed.
- Whenever possible, buildings slated for demolition on the outside edge of the cantonment area will be demolished first, and the land will be returned to a more natural grassland or woodland habitat.
- Whenever possible, new testing sites will be established on sites now or formerly occupied by testing sites.
- New facilities will be established on undeveloped land only if currently or previously developed lands are not available to meet the needs of the facilities.

Prevention and correction of soil erosion on IAAAP is accomplished by improving vegetative cover and installing supporting engineering measures. Potential erosion problems can be overcome by planting stabilizing vegetation and/or planting legumes of low palatability to grazers (Mason & Hanger Corporation 1991). Vegetation provides effective control of erosion for most sites. Even on slopes, vegetation is used effectively where combined with other control measures.

Land rehabilitation work on IAAAP is not normally dependent upon intensive heavy equipment work with massive land reshaping. Projects strive to minimize damage to vegetation and to use natural drainages. Care is taken to ensure that heavy equipment operations do not disturb native vegetation more than absolutely necessary. This is especially true in areas with more erodible soils due to the difficulty in revegetating these areas.

Contour farming is practiced as part of the conservation tillage program. Contour farming significantly reduces erosion and runoff by following natural contours of the land. In areas where cropland is gently sloping and smooth, with a stable topsoil and high infiltration capacity, soil and water loss can be reduced by a factor of up to four by conducting planting and tillage parallel to field contours (Dunne and Leopold 1978). Grass-lined terraces have been constructed in agricultural areas to help minimize erosion.

IAAAP has initiated a program to improve soil resources through the agricultural outlease program, which provides support for the ecosystem as well as the agricultural program. The Plant has assumed control of the application of lime and fertilizer on agricultural areas. Some outleases were experiencing reduced soil productivity due to inappropriate management by leasees. The Natural Resources Manager determines locations and applicable rates of application. IAAAP started an aerial seeding of cover crop program in 2017. It is expected that this program will lead to reduced erosion by wind and water, increase soil health, and reduce the need for commercial fertilizers over time. These programs are further discussed in Section 4.10, *Agricultural Outleases*.

Road drainage maintenance is important to control sedimentation. General road maintenance and construction is done within provisions of the contract for IAAAP operation by American Ordnance LLC.

Earth-covered magazines are a special concern at IAAAP where ammunition storage is a significant activity. Steep sides of earth-covered magazines are susceptible to erosion. Storage areas are primarily vegetated with smooth brome grass. Ammunition storage areas have been grazed, and cattle tend to cut paths on igloo sides, leading to erosion. IAAAP has fenced earth-covered magazines to restrict cattle from these areas. However, more recently, the Plant has started to remove cattle and fences from storage areas as leases expire. This is primarily due to inappropriate or lack of maintenance being performed by leasees. The areas around magazines are being converted to hay areas and the magazines themselves are being otherwise maintained by IAAAP. The Plant still allows grazing but not to the same degree as in the past. The Natural Resources office monitors and maintains cattle stocking rates on the Plant to minimize soil compaction and erosion. Other management issues with storage igloos are animal burrowing and tree roots penetrating the slopes, which are addressed on a case-by-case basis.

Boundary and other fencing projects have erosion potential. For example, the construction of a 12-mile section of fence along the southern portion of the installation cleared a 50-foot width along the entire route. However, measures were taken to reduce erosion, such as the use of silt fences, land contouring, and revegetation. These projects are coordinated with the USFWS with regard to possible effects to the Indiana and northern long-eared bats. Mitigation is necessary for this type of project on IAAAP.

In accordance with AR 200-1, IAAAP has developed a Soil Erosion and Sediment Control Component to the INRMP. Appendix 4.3 is the component document, which is a resource for the installation to use to identify potential erosion and sediment control issues and take appropriate measures to prevent or minimize the associated impacts.

4.3.2 Proposed Management

Project: Soils Management

Justification: Maintaining the capability of military lands to support the military mission (Sikes Act), compliance with the CWA, stewardship

Project Timing: Ongoing

Regulatory Coordination: None required

Change from Current Management: Moderate; Aerial seeding of cover crops

Goal. Repair damaged soils and use soil parameters to manage military activities, protect soil stability, restore installation lands, and conserve wildlife habitat.

Objective 1. Assess effectiveness of aerial seeding of cover crops and expand program if appropriate.

Objective 2. Use improvement of vegetative cover and contour farming to prevent soil erosion.

Objective 3. Ensure that roads are maintained and upgraded as necessary.

Objective 4. Consider soils management in implementation of the agricultural grazing program.

Objective 5. Use soil inventory data to make decisions regarding land use, rehabilitation options, and wildlife habitat management options.

Objective 6. Use the Soil Erosion and Sediment Control Component document (Appendix 4.3) to identify potential erosion and sediment control issues and take appropriate measures to prevent or minimize the associated impacts.

4.4 Water Resources Management

AR 200-1, *Environmental Protection and Enhancement*, (Department of the Army 2007) establishes the following general policies for water resources on Army lands within the United States:

- Comply with applicable federal, State, and local laws and regulations regarding water resources management and permitting.
- Obtain and comply with all required federal, State, and local CWA, Coastal Zone Management Act, and Safe Drinking Water Act permits (includes wastewater and storm water permits, operational permits for drinking water systems, groundwater discharge permits, wetland 404/401 permits, septic system permits, underground injection control, etc.).
- Identify and implement pollution prevention initiatives.
- Participate with regional authorities in the development and implementation of water resource initiatives and plans.
- Mitigation wetlands are wetlands that replace the functions performed by drained, filled, or degraded wetlands on installation project sites. They should, whenever possible, be sited within the same watershed as the affected installation wetlands and outside installation boundaries so installations can retain maximum land-use flexibility.

Some of the responsibilities for implementation of the above policies are outside the scope of this INRMP, but to one degree or another, all potentially affect IAAAP's water resources programs. The below discussion emphasizes water resources actions taken by the Natural Resources program.

4.4.1 Current Management

Monitoring

Water quality reflects environmental pollution. Surface water monitoring is done as required by the IAAAP NPDES permit requirements. Spring Creek and Brush Creek storm water is monitored quarterly.

Groundwater is one of IAAAP's most valuable natural resources. Long-term monitoring is designed to test for total metals, explosives, volatile organic compounds, and semi-volatile organic compounds. Over 300 wells are monitored on an as-needed basis. There is also some pesticide and radionuclide testing of groundwater. Some mission-associated groundwater contamination exists both on and off of IAAAP.

Management

Most water quality laws and regulations are not the responsibility of the Natural Resources office at IAAAP and are thus not within this INRMP. Erosion is a significant threat to water quality, and it has locally significant impacts. Decades of formal land management have greatly enhanced IAAAP's capability to protect water quality from sedimentation. Sections 4.3 - *Soil Management*, 4.6.1.2 - *Wetland Management*, 4.10 - *Agricultural Outleaves*, 4.11 - *Pest Management*, and 5.4 - *NEPA* specifically reduce negative impacts to water quality or mitigate such damage.

IAAAP has many terraces on agricultural fields. These terraces detain water, causing sediment to drop out. The water slowly drains via tile pipes to the nearest ditch or waterway. A by-product of this system of terraces is an increased runoff of pesticides. The installation has increased the use of grass waterways, instead of terraces, which increases the retention of both sediment and pesticides on the land and reduces

deposition in surface water. Pesticide runoff may be reduced by as much as 70% through the use of grass waterways. IAAAP primarily uses a combination of grass waterways and tile systems. Replacement of some tile systems has been necessary due to holes in the plastic tile piping caused by mice, which, although small to start, can result in large eroded holes/areas in agricultural fields. The use of these practices creates a significant improvement in surface water quality.

IAAAP is committed to the protection of water quality and its associated values on IAAAP watersheds and on watersheds that drain from the Plant. IAAAP controls or eliminates runoff and erosion through sound vegetative and land management practices and considers nonpoint source pollution abatement in all construction, operations, and land management plans and activities.

4.4.2 Proposed Management

Project: Water Resources Management

Justification: Stewardship

Project Timing: Ongoing

Regulatory Coordination: USACE (CWA objectives)

Change from Current Management: No significant changes

Goal. Protect surface water quality at IAAAP.

Objective 1. Use water quality data to make decisions regarding land use, restoration options, and fish and wildlife habitat management options.

Objective 2. Control or eliminate runoff and erosion that could affect surface waters.

Objective 3. Consider nonpoint source pollution abatement in construction, operations, and land management plans and activities.

4.5 Forest Management

AR 200-1 (4-3d(7)) and 4-3d(8)(b), (f), and (j)(2)) (Department of the Army 2007) requires the following with regard to forest management.

- Practice responsible stewardship of forested lands to support the mission.
- Routinely examine Army land to determine what areas, if any, are available for forest management.
- Sell no forest products unless the effects of the sale are compatible with the INRMP.
- Use revenues from forest product sales only for management of forests and natural resources that support forest stewardship on land affected by conservation reimbursable forestry programs.

Army policy regarding commercial forest products includes the following requirements¹⁵:

- continue the evolvement from commercial-oriented forest management to ecosystem-oriented forest management that gives first priority to the mission requirements;
- include planning and NEPA analysis in all timber sale decisions;
- incorporate forest management into INRMPs;
- assure natural resources managers are available and as free as possible of commercial influence;

¹⁵ Memorandum for Assistant Chief of Staff for Installation Management from Ray Clark, Principal Deputy Assistant Secretary of the Army (Installations and Environment), 2000, *Army Forest Resources Conservation*.

- ensure natural resources professionals need not rely exclusively on the economic returns of commodity production to accomplish landscape management, compliance, and stewardship; and
- eliminate pressure to conduct unsustainable forest management.

No forest product or timber sales are anticipated over the next five-year period.

4.5.1 Current Management

Forests on IAAAP are either pre-acquisition farm woodlots, which were often grazed both before acquisition and during the first 10 years of acquisition, or areas that have grown since acquisition (which makes them relatively young). Prior to 1970, mixed hardwood stands were managed under a modified uneven-aged management system. Between 1970 and 1977, installation forests were managed under an even-aged system using growth rates to determine harvests, which were accomplished using group selection and small clearcuts. Since then, individual stands have been managed using uneven-aged management, a 100+-year rotation, and a 10-year cutting cycle (Mason & Hanger Corporation 1990). Mason & Hanger Corporation (1990) divided IAAAP into 10 compartments (stands of forest with similar species, size classes, and stocking).

The forest inventory was performed using a variable plot cruise by the IDNR District Forester. From 1992 to 1994, field data were collected to update this inventory. This inventory includes stand-specific data for the 10 forest compartments. It includes sawtimber volumes, 10-year incremental growth of sawtimber, data by size classes, and recommendations for timber stand improvement (Geode Resource Conservation and Development 1994). Timber stand improvement is defined as improvements to timber stands that do not involve intermediate or final commercial harvest.

Forest resources on IAAAP are relatively young, and quality sawtimber is available. It will likely be another 10 - 20 years before some walnut sawtimber becomes available. It is too costly to actively manage the limited forest resources on the Plant. Management is primarily in the form of protection, such as prohibiting the use of screw-in tree stands. Any future forest inventory should include more detailed information regarding undergrowth. This would be useful for making harvest/regeneration decisions, as well as for evaluating the overall forest ecosystem.

The 1974 to 1978 inventory indicated 7,766 acres under management, with an estimated 10,170,000 board feet of merchantable volume (Mason & Hanger Corporation 1991 and 1990). The last timber sale on IAAAP was in 1983 (Mason & Hanger Corporation 1990), although, a salvage cut was performed in 2000 to remove trees with oak wilt and prevent the spread of the disease (IAAAP 2000). From 1977 through 1990, tree planting for forest regeneration was stopped because of extensive deer damage. In 1992, 80 acres of mixed hardwoods were planted, but failed to mature due to heavy deer pressure and improper selection of soil types. Discovery of the Indiana and northern long-eared bat on IAAAP in 1998 significantly affected forest management planning on the installation. Management of these two federally-listed species is via the *Endangered Species Management Plan for the Indiana Bat, Myotis sodalis, and Northern Long-Eared Bat, Myotis septentrionalis, Iowa Army Ammunition Plant, Des Moines, Iowa* (Stantec 2015). The ESMP specifies management prescriptions for forest management.

IAAAP manages its forest resources, but not for commercial value. Security and cultural resources requirements as well as personnel limitations have curtailed the ability of IAAAP to support commercial forestry management. Forest ecosystem management is considered a wildlife habitat program. IAAAP's forestry management emphasizes support of the military mission, enhancement of ecosystem integrity, protection of watersheds, management of wildlife habitat, and provisions for outdoor recreation. Forest management practices on IAAAP reflect USFWS Indiana and northern long-eared bat guidelines, as

specified in Appendix 4.8.1.1. This appendix includes management prescriptions and implementation portions of the ESMP (Stantec 2015).

4.5.2 Proposed Management

Project: Forest Management

Justification: Maintaining the capability of military lands to support the military mission (Sikes Act), stewardship

Project Timing: Ongoing

Regulatory Coordination: USFWS regarding Indiana and northern long-eared bats

Change from Current Management: No significant change

Goal. Manage the forest ecosystem to support the military mission and maintain ecosystem integrity.

Objective 1. Use ecosystem-focused management with emphasis on the military mission, enhancement of ecosystem integrity, protection of watersheds, management of wildlife habitat, and provisions for outdoor recreation.

Objective 2. Implement forest management prescriptions (Stantec 2015) to preserve habitat for Indiana and northern long-eared bats on IAAAP.

Objective 3. Ensure that natural resources personnel are as free as possible of commercial influence to accomplish landscape management, compliance, and stewardship.

Objective 4. Plant trees as necessary to mitigate projects that damage or remove wildlife habitat and to enhance existing wildlife habitat.

Objective 5. Consider the issue of deer damage when using tree planting as a forestry technique.

4.6 Habitat Management

General fish and wildlife habitat management programs are described in this section, including wetland management. Forest management is described in Section 4.5, *Forest Management*. Programs to manage and protect sensitive and listed species are described in Section 4.8, *Rare and Listed Species Management*. Programs designed to manage special interest areas are described in Section 4.9, *Special Interest Areas Management*. Fire management aspects of habitat management (*i.e.*, prescribed burning) are described in Section 4.13, *Fire Management*.

4.6.1 Current Management

4.6.1.1 Inventory and Monitoring

Floral Inventory

Horton *et al.* (1996) established a list of vascular plants for IAAAP. A forest inventory was conducted from 1974 to 1978 on IAAAP. The Natural Resources Manager updates the list of known species on IAAAP as discoveries are made. These studies are useful both as benchmarks for future comparisons and as basic references for current and future management and studies. The list of plants known to occur on IAAAP is maintained in the Natural Resources office. Section 3.3.2.2, *Floral Inventory* discusses studies of flora on IAAAP in further detail.

Vegetative Mapping

Vegetative communities mapping of IAAAP was completed by Tetra Tech EM Inc. (2001a). Maps should be periodically updated. Maps are available in the IAAAP Natural Resources office.

4.6.1.2 Wetland Management

The CWA (1977), its pertinent Sections, regulatory administration and wetland definitions and functions are discussed in Section 3.3.2.5, *Wetlands*.

Inventory

Inventory of wetlands on IAAAP is discussed in Section 3.3.2.5, *Wetlands*. IAAAP has no need for further wetland surveys since adequate wetlands information for the Plant is readily available from the National Wetlands Inventory (Swords *et al.* 1999). In depth surveys are a requirement of projects on IAAAP and are performed on a case by case basis. Maps showing wetlands and deepwater habitats on IAAAP are available in the IAAAP Natural Resources office.

Management

Wetlands protection is required by Executive Order 11990, *Protection of Wetlands*. Protection and maintenance of habitat are the primary thrust of wetlands management on IAAAP. The quality of wetland watersheds affects the quality of downstream wetland plant and animal communities.

Environmental clearance review is the primary means of detecting threats to wetlands on IAAAP. The Natural Resources Manager reviews actions that may affect wetlands. The CWA (1977), Section 404, requires that a permit be obtained for any activity that may affect *waters of the United States, including wetlands*. The USACE has the primary responsibility for administering the Section 404 permitting process. If necessary, projects with potential impacts are referred to the USACE to determine if jurisdictional wetlands are implicated, establish mitigation procedures, and/or obtain permits. Wetland-affecting projects require NEPA documentation.

Activities in wetlands that require federal permits include, but are not limited to:

- placement of fill material, ditching activities when the excavated material is sidecast,
- mechanized land clearing,
- land leveling, most road construction, and
- dam construction.

The USACE permit process requires coordination with the USFWS and the State Historic Preservation Office to allow for the assessment of potential impacts to protected species and cultural resources.

IAAAP takes the following measures to protect and manage wetlands:

- encourage project managers to coordinate early with the Operations Support Division to determine adverse impacts to wetlands;
- constrain development to avoid wetland impacts to the maximum extent possible and mitigate unavoidable impacts;
- review Operation and Maintenance programs that potentially impact wetlands, and develop procedures and guidelines to avoid loss of wetland functions;
- pursue water quality management procedures that protect wetlands from excessive silt-laden runoff (*e.g.*, reduce tillage, plant grasses, use silt fences); and
- consider impacts of forestry operations on wetlands, especially wooded wetlands.

IAAAP constructed wetlands on three sites; Line 1, Line 800, and the Line 1 borrow site, in association with a project to use phytoremediation to remove residual TNT from soils and surface water. A fourth wetland near Line 4A was developed in association with the south boundary fence project, and another was completed next to the Line 4A wetland, which will be in association with the 40-millimeter test range project.

Other sections of this INRMP have provisions to protect water quality and, therefore, wetlands: Section 4.3, *Soils Management* and Section 4.4, *Water Resources Management*.

4.6.1.3 Terrestrial Habitat Management

General

Providing quality habitat for indigenous plants and animals is the primary mission of the natural resources program. Habitats are managed by maintaining edge areas, providing well-distributed water sources, and other maintenance, such as invasive species control, prescribed burning, and agricultural crops. Protection of riparian areas and wetlands and restoration of native prairie areas enhance the variability of wildlife habitats available on IAAAP.

Below habitat management practices on IAAAP are categorized as a means to discuss them. However, there is overlap within these sections as well as with other sections of this INRMP. Agricultural area, including hay and grazing area management is a significant program directly related to management of terrestrial habitats on IAAAP. Section 4.10, *Agricultural Outleaves*, discusses this program.

Prairie Areas

Although some areas of IAAAP have relatively undisturbed native prairie communities, they are usually less than one acre. Examples of these small, remnant patches include an area on the eastern boundary, behind D Yard; and another southwest of Stump Lake and northwest of Test Fire where the railroad track splits. In addition to protecting these small patches, IAAAP has established about 40 acres of native grass prairie since the early-1990s. Primary factors in successful prairie restoration on IAAAP include proper site selection, use of local genotype seeds, planting in spring, and using local experts and resources as necessary. IAAAP's goal is to restore prairie on smaller areas not suitable for, or difficult to farm. In 1992, Pheasants Forever, Des Moines County Conservation Board, and IAAAP planted 3.8 acres to native grasses as a demonstration project to draw public attention and interest to native grass prairie. During spring 2012, about 12 acres of native grass prairie were planted. This planting enhanced wetland mitigation efforts for the two sites near Line 4A (discussed in Section 4.6.1.2, *Wetland Management*) by connecting these sites with native vegetation. Agricultural track 19 (approximately 186 acres) was converted to prairie using a modified pollinator seed mix in the spring of 2007.

Remnant prairie sites and established prairie areas are managed to protect native grasses. Eastern red cedar (*Juniperus virginiana*), a common prairie invader, are cut, and the areas are prescribe burned following removal. Development activities on prairie sites are generally avoided. Prairie areas provide habitat for numerous wildlife species.

Brush pile wildlife habitat is created on IAAAP as a by-product of native prairie restoration. This is important habitat for game and nongame birds and mammals. There are no plans to specifically build brush piles on IAAAP, but brush pile construction as part of other land clearing projects is done on an opportunistic basis.

Invasive Species Control

An invasive species survey was performed at IAAAP in 2003 (Tetra Tech EM, Inc 2003). Eastern red cedar control is discussed above, under *Prairie Areas*. Multiflora rose (*Rosa multiflora*) is a problem in many areas of the Midwest. IAAAP has used an integrated pest management tactic of killing this noxious plant with disease. Rose rosetta disease was spread to unaffected multiflora bushes using grafts. This was effective, but labor intensive. Boy Scouts assisted with this effort.

Musk thistle (*Carduus nutans*) is a problem in grazing areas and on earth-covered magazines. Mechanical, chemical, and biological (weevil) means of control have been used for musk thistle. It is anticipated that the extent of musk thistle infestation will diminish with removal of some cattle lease areas on the Plant.

Garlic mustard (*Alliaria petiolata*) has been spreading throughout the installation in forested areas and along edge habitat. Biological control agents are the only true option for control of garlic mustard. Teasel is a roadside/pasture invader on IAAAP. Mechanical and chemical methods of control are used. Section 4.11, *Pest Management*, discusses noxious plant control further.

For the Plant to succeed in control of these invasive species, manpower, equipment, and funding are required. These management measures for invasive species on IAAAP are the best combination of options to meet the Plant's vegetative management needs at a reasonable cost. IAAAP is dedicated to the prevention of introduction of invasive species as well as their control, per Executive Order 13112, *Invasive Species*.

Nest Boxes

IAAAP has 75-100 eastern bluebird (*Sialia sialis*) nest boxes. These are ideal projects for volunteers and other conservation organizations. Bluebird nest boxes must be cleaned out and maintained each March. Nest boxes unused by bluebirds are a favorite night roost for black-capped Chickadees (*Parus atricapillus*). Swallows and wrens also utilize the nest boxes.

4.6.1.4 Aquatic Habitat Management

IAAAP has 42 widely-distributed ponds and lakes. As of August 2017, a new pond is 99 percent complete at a borrow site along C Road. The Natural Resources Manager is coordinating this effort with onsite heavy equipment operators. Borrow activities are nearing completion, and the pond will be completed as funding becomes available.

With exception of Mathes Lake, only five impoundments are managed for bluegill, redear (*Lepomis microlophus*), bass, white crappie (*Pomoxis annularis*), and catfish. Due to small size and shallow water conditions, many ponds do not support a fishery population; therefore, amphibian habitat is the focus of management of many of these water bodies. Only Mathes Lake is managed to support a greater variety of fish. This variety includes walleye (*Sander vitreus*), although walleye have not been stocked for about three years due to cost; hybrid striped bass (*Morone saxatilis* x *M. chrysops*) were stocked in the past.

Over the years Mathes Lake had lost holding capacity from sedimentation. There are railroad tracks on the dam and a trestle across the spillway, so instead of removing or replacing the dam, a 4-foot concrete wall was constructed in front of the spillway to deepen the lake. Other improvements, such as installation of a jetty for angler access, picnic tables, and providing portable toilets, have enhanced recreational fishing at Mathes Lake.

Most recently a project has been initiated to repair the dam at Mathes Lake due to erosion and sloughing of the embankment, which is jeopardizing the railroad tracks and trestle. In addition, the spillway has been undercut and damaged by high water events and will be repaired/replaced as part of the project. As of

August 2017, these issues have been addressed/repared without need of draining the lake. However, outlet work still needs to be addressed. The Division is currently pursuing an agreement with USFWS for renovation and restocking assistance. Renovation would include removal of an estimated 30,000 to 40,000 cubic yards of sediment in the boat ramp area. In addition, as funding will allow, renovation would include installation of a concrete boat ramp and improved fish habitat.

Stump Lake (Lake 19) had relatively large amounts of sediment in the upper basin. The USACE completed removal of about 60,000 cubic yards of sediment and increased the height of the dam in 2002. Spoils were used as cover for closure of the inert landfill on IAAAP.

Sunken brush piles, reefs, logs, stumps, gravel, and other objects provide cover that promotes fish breeding. These structures provide security for fish fry, make defense of nests easier, and concentrate larger predator fish. Fish structure projects have been accomplished on an opportunistic basis at IAAAP, often using volunteer labor. One source of material for these projects is cedar and other trees removed from areas that are being converted to native prairie. The trees are sunk into ponds or anchored into lakes to keep them from flushing during flooding.

4.6.2 Proposed Management

Project: Habitat Management

Justification: Maintaining the capability of training lands to support the military mission (Sikes Act); compliance with Executive Order 13112, *Invasive Species*; stewardship

Project Timing: Objective 12 and 17 - 2013; objective 20 and 21 - 2014; objective 16 - uncertain; other objectives - ongoing

Regulatory Coordination: USACE (CWA objectives)

Change from Current Management: No significant change

Goal 1. Monitor vegetative communities that are indicators of ecosystem integrity, capability of lands to support military missions, status of sensitive species or communities, and other special interests.

Objective 1. Update the flora inventory as new species are found through field observations, site-specific surveys, sensitive plant species surveys, and other projects.

Objective 2. If plants that are federally-listed are found on IAAAP, develop an inventory/monitoring program for these species.

Objective 3. Periodically update the vegetation map for IAAAP.

Goal 2. Manage wetlands to ensure “no net loss” per Executive Order 11990.

Objective 4. Maintain the database on wetland resources at IAAAP.

Objective 5. Use site-specific surveys to evaluate wetland resources if potential wetland impacts are proposed.

Objective 6. Use the environmental review process to protect wetlands.

Objective 7. Provide certified jurisdictional wetland delineations (and permit application, if necessary) if a project is planned in a suspected wetland.

Objective 8. Maintain wetlands quality through active management (e.g., prescribed burning), if necessary.

Goal 3. Manage wildlife species habitats based on conservation needs, distribution and threats, population trends, importance of areas to species, potential for population and/or habitat management, and human interests.

Objective 9. Maintain terrestrial habitats, primarily through the agricultural outlease program.

Objective 10. Manage native prairie areas through appropriate grazing management, reintroduction efforts, clearing woody vegetation, and prescribed burning.

Objective 11. Concentrate native prairie restoration efforts on smaller tracts that may be problematic to farm.

Objective 12. Control invasive species, such as eastern red cedar and multiflora rose, using integrated pest management techniques.

Objective 13. Continue the Bluebird nest box program at IAAAP using volunteers to construct and maintain the boxes as appropriate.

Goal 4. Maintain and enhance the natural diversity of aquatic communities on IAAAP.

Objective 14. Manage Mathes Lake to support a greater variety of fish and the five other primary impoundments on IAAAP for bluegill, redear, bass, white crappie, and channel and flathead catfish.

Objective 15. Use land use control procedures to manage the small, shallow ponds on IAAAP for amphibian habitat.

Objective 16. Add rip-rap to the Mathes Lake spillway to form a fish barrier as funding becomes available.

Objective 17. Install fish structures as opportunities arise.

4.7 Fish and Wildlife Management

Native species biodiversity conservation is a cornerstone of ecosystem management. IAAAP is taking appropriate steps via this INRMP and numerous studies and reports that have preceded it to ensure that overall biodiversity is not compromised at the Plant. Wildlife population management directly influences populations as opposed to the soil, water, and vegetation management practices and protective measures, which indirectly affect populations, as discussed in other sections of this INRMP.

The overall fish and wildlife management goal is to maintain populations in accordance with species priorities, population ecology, population health considerations, and habitat capacities. General fish and wildlife population management programs are described in this section. Specific habitat management programs are described in Section 4.6, *Habitat Management*. Programs to manage and protect sensitive and listed animal species are described in Section 4.8, *Rare and Listed Species Management*. Pest species management related to natural resources programs is described in Section 4.11, *Pest Management*.

4.7.1 Current Management

4.7.1.1 Inventory and Monitoring

Information on species occurrence has been collected through numerous projects. Section 3.3.3, *Fauna* discusses faunal species found on IAAAP.

White-tailed Deer

White-tailed deer are the primary wildlife species regularly monitored on IAAAP. Harvest indicates herd growth from low levels in 1961 through 1966. Winter counts indicated an increasing herd in the mid-late 1970s. Harvest levels remained fairly stable until about 1980. The herd apparently grew rapidly in the early 1980s as indicated by both harvest and census data, peaking in 1985 when 1,843 deer were harvested. Exceptionally large harvests from 1983 through 1988 apparently helped reduce herd size considerably. The herd fell to the point where no hunting was allowed in 1992; however, hunting resumed in 1993. The herd increased until 1995 when a cold, wet spring apparently resulted in high fawn mortality, which decreased herd size, as verified by the 1996 census. Hunting was not allowed in 2001 due to heightened security prompted by the September 11 terrorist attack. Hunting has been allowed annually since it resumed in 2002. Based on data collected since then, the 2017 herd was estimated to be at about 1,000 animals. IAAAP has set a goal of 380-400 animals harvested each year to keep the population near 1,000 animals with a female:male sex ratio of 2 or 3:1.

Spotlight Surveys

Spotlight census began in 1995 when two surveys were conducted in August and September. These surveys have continued but with more emphasis on maintaining census protocols to ensure that yearly data comparisons are reliable. This requires 5 - 10 years of consistent data before changes in spotlight count data can be correlated with deer population trends. Since 1996 spotlight counts have been used to estimate sex ratios, stock numbers, and health in the herd. Presunset counts are used to track changes in recruitment. Deer census protocol includes the following:

- Two sets of counts conducted annually, one in April and one between 15 July and 15 August. The April count determines stock numbers. The summer count determines sex ratios and recruitment. It is important to survey deer while they are foraging in hay and soybean fields, as they are more visible there than in corn fields. Conducting this count earlier would underestimate fawn populations since they are not all moving with adult deer prior to mid-July. Separate evening fawn counts are conducted in mid-late August to estimate fawn survival.
- If rain or fog interrupts a survey, it is repeated. A repeat is the preferred alternative since deer often become inactive or highly active before a storm arrives.
- Spotlight counts begin at dusk and are generally completed in 3 - 4 hours.
- Survey routes do not vary. Two people (minimum) are required to conduct the surveys. Binoculars are used to help determine sex. Any uncertainties are classified as unknowns. Unknowns are not included in buck:doe or doe:fawn calculations, but are included in the total.
- Spotlights used have at least one million candlepower.

Aerial Surveys

The IDNR conducted annual fixed winged aerial transect counts that included IAAAP. The IDNR conducted counts in 1994 - 2011 with exception of 1998, 2005, and 2009 due to lack of snow cover.

IAAAP has a goal of achieving a 2:1 sex ratio for its deer herd with no higher than a 3:1 ratio (females: males) acceptable. The installation also has a goal of a winter herd of 800 - 1,000 animals. The Army's 1994 and 1995 helicopter surveys found 800 and 828 deer respectively, and the 1996 survey showed 590 deer. With the helicopter no longer affordable, IAAAP switched to spotlight and forward looking infrared

radar counts. In March 2003, the first forward looking infrared radar count was conducted and showed 1,500 deer in the spring herd, no doubt due to the effect of no hunting in 2001. A second forward looking infrared radar count was conducted in 2007 and counted 1,113 deer. The spring 2011 herd estimate was under 800 animals.

Harvest Check Stations

Overall deer herd health is monitored using harvest check stations. Legally harvested deer are checked prior to being transported off IAAAP. Data collected includes sex, zone harvested, field-dressed weight, and number of tines (if antlered). The Natural Resources Manager ages harvested deer when he is available. Photographs are taken of bucks with particularly nice racks. Reproductive data are not taken since previous studies showed that reproductive data were not particularly needed for harvest management decisions.

Past studies of ticks from harvested deer proved that Lyme disease is found on IAAAP. At least two confirmed cases of this disease in humans have been documented on the installation. Tissue studies have been conducted on deer, but no significant disease indicators were found during the study. Chronic wasting disease testing was performed on the installation, and no cases were found. No additional disease or parasite studies on deer are planned at this time.

Wild Turkey

Wild turkeys were transplanted onto IAAAP as part of an IDNR turkey restoration program. Reintroduction to IAAAP began in 1974, and wild turkeys have done so well that IAAAP has been used as a source of birds for transplanting to other regions. Prior to 1995, about 100 wild turkeys were trapped and removed by the IDNR from IAAAP annually. In 1995, 50 birds (10 toms and 40 hens) were removed for transplanting. Turkeys are no longer trapped at IAAAP. IAAAP harvest data are collected and include weight, hunting zone, spur length, and beard length.

IAAAP monitors effects of turkey hunting through the collection of harvest data. Summer survey data, observations by the Natural Resources Manager, are collected and sent to IDNR. The IDNR uses this data to develop annual population trend reports. Turkey sighting data is combined with harvest and hunter success data to help evaluate harvest goals.

Other Game Species

Other game species are monitored using harvest data. Harvest generally reflects relative population size, and this information is adequate for the management of other IAAAP game species. Harvest data for the eastern fox squirrel, eastern gray squirrel, eastern cottontail, bobwhite quail, ring-necked pheasant, American woodcock, mourning dove, American crow, and coyote are collected by Security personnel at installation gates and turned over to the Natural Resources Manager for use in inventory, monitoring, and planning purposes.

Fish

Prior to 1989 voluntary creel surveys were used to monitor fish harvests on IAAAP, but this practice was discontinued at the recommendation of the USFWS due to unreliability and insufficient voluntary compliance (Milligan 1987). Fish harvested are reported to Security personnel at installation gates. This provides adequate monitoring of fish harvest on most impoundments.

Other Species

Other species are not formally monitored other than through incidental observations for abundance and general health. Such observations are normally made by the Natural Resources Manager while performing other management activities.

4.7.1.2 Fish and Wildlife Population Management

The manipulation of fish and wildlife populations is an important aspect of fish and wildlife management. Human use of sustainable resources is a critical aspect of ecosystem management. This use includes hunting, trapping, and fishing on IAAAP. Army Regulation 200-1 (Department of the Army 2007) requires the management of game and sport fish to ensure sustainability of harvests and protection of species involved.

Section 4.14, *Outdoor Recreation* includes recreational aspects of game management. Below descriptions of harvest strategies do not include detailed historic harvest data, which are available at the IAAAP Natural Resources office. IAAAP Regulation 420-1, *Hunting and Fishing Regulation* outlines responsibilities, eligibility, safety, etc. for hunting and fishing on the installation. Figure 3.4.2 shows areas open to recreation, including hunting.

IAAAP is considered a Deer Population Management Zone by IDNR, which means harvest regulations are designed specifically for its lands. Game harvest is controlled by IDNR with regard to general harvest regulations. IAAAP has the option to be stricter within IDNR regulations for seasons, methods of take, and limits. This gives the advantage of providing more flexibility to manage hunting within needs of the military mission. For example, shotgun hunting could be prohibited in certain areas due to nearby production or storage facilities.

White-tailed Deer

Annual harvest of white-tailed deer is the primary control measure used for the Plant's deer population. The number of deer harvested on IAAAP has been relatively consistent over the past several years, especially when compared to fluctuations in harvest in the 1980s (see Section 4.7.1.1, *Inventory and Monitoring*, under White-tailed Deer). Four years were required to achieve population control following the 2001 season when no hunting was allowed. The number of deer harvested in 2002, 2003, 2004, and 2005 was 532, 601, 429, and 439 respectively. During 2009, 356 deer were harvested, 81 bucks and 275 antlerless; and during 2010, 199 deer were harvested, 46 bucks and 153 antlerless. The number of deer hunters remains stable at about 215-260 annually. IAAAP can sustain an annual harvest of about 200 animals.

IAAAP's archery season normally runs from early October through early December (1 October - 2 December, 2011-2012 season) and a late season of about mid-December through early January (19 December - 10 January, 2011-2012 season). Two shotgun (slugs-only) deer seasons are held during the archery break, an early season (3 - 7 December, 2011-2012 season) and a late season (10 - 18 December, 2011-2012 season). The bag limit is such that a hunter may take no more than one antlered deer during these combined seasons. Party hunting, during gun season only, is allowed in Iowa (whereby a hunter may shoot a deer for another member of his or her hunting party).

Iowa allows two muzzleloader deer seasons, an early season (15 - 23 October, 2011-2012 season) and a late season (19 December - 10 January, 2011-2012 season). Iowa also has a youth and disabled hunter deer season (17 September - 2 October, 2011-2012 season). IAAAP bag limits and harvest goals change annually.

A special requirement on IAAAP is that all deer hunters, with exception of youth and handicapped hunter seasons, must harvest an antlerless deer prior to harvesting an antlered deer. Furthermore, the antlered deer must be harvested in the same season as the antlerless deer. The IAAAP deer hunting program is designed

for Iowa residents as the installation is a Deer Population Management Zone under IDNR regulations, and special hunt area deer tags are not issued to nonresidents.

The Plant's deer management philosophy has been refined over the years. Management of white-tailed deer on IAAAP focuses on maintaining the population slightly below or at the carrying capacity of the range to allow for an upward trend in habitat condition. The change in philosophy has allowed IAAAP to develop into a quality management area, providing both quality animals and quality hunting experiences and opportunities.

Wild Turkey

The wild turkey population on IAAAP is healthy; the goal for the population is to allow it to reach habitat carrying capacity. The Plant uses harvest to manage its turkey population.

Spring turkey hunting season should begin soon after most hens have been bred and are thus largely separated from vulnerable toms. This period changes slightly from year to year. Iowa has four separate spring turkey seasons and a youth spring season. The youth season is first, 7-15 April 2012. The first general spring season is 16-19 April 2012. The four seasons last 4, 5, 7, and 19 days, respectively. In 2012, these seasons will be held between 16 April and 20 May. IAAAP hunters may harvest one tom during the spring seasons. About 40-50 turkeys are taken annually on IAAAP, mostly during spring seasons.

Fall turkey season was opened for the first time in many years on IAAAP during fall 1995. Fall 2011-2012 turkey hunting seasons include combination gun/bow (10 October - 2 December) and archery-only (1 October - 2 December and 19 December - 10 January). The bag limit on IAAAP is one either-sex bird per license, but no more than two total birds.

Other Game Species

The following game species are managed by the IDNR using controlled hunting and trapping for species producing annual surpluses. IAAAP uses state-established seasons and regulations. Trapping and hunting regulations are described in Iowa Hunting and Trapping Regulations, which are published annually by the IDNR.

Quail

There are no population trend data available for quail on IAAAP. In general, bobwhite quail have been at low levels since the 1970s when a series of severe winters caused a major population decline. Quail harvest requires little census input due to hunter-caused mortality largely compensating for natural mortality rather than adding to it. Also, hunting pressure (and resulting mortality) tends to be directly correlated to quail population density. Hunters will not spend time afield if a reasonable opportunity for harvest does not exist. Thus, it is extremely unlikely that quail harvest would ever be high enough to lower the population to levels which would result in too few birds the following breeding season. The Iowa quail season generally is open from the last Saturday in October through 31 January. The bag limit is eight birds daily.

American Woodcock

There are reasonably good numbers of American woodcock on IAAAP, and numbers appear to be fairly constant. In 1995 IAAAP initiated the first woodcock hunt on the installation. Woodcock season is from mid-September through mid-November with a daily bag limit of five birds.

American Crow

American crows are not hunted much on IAAAP. However, the population is healthy, and numbers appear to be steadily increasing. Crow hunting is allowed from mid-October through the end of November and from mid-January through the end of March. There are no bag limits.

Waterfowl

There is limited hunting of waterfowl or geese on IAAAP. Following dramatic declines in many important duck species for almost 30 years, duck numbers have made good comebacks throughout most of their range in North America.

Rabbits

There are few eastern cottontail rabbits (*Sylvilagus floridanus*) on IAAAP, and rabbit hunting is relatively unimportant. There are no data on population trends, except to note continuing low numbers. The season for cottontail rabbits is from September 3, 2011 through February 28, 2012. The daily bag limit is 10.

Squirrels

Fox squirrels are plentiful on IAAAP; gray squirrels are less abundant. Neither is hunted to any significant degree. Numbers appear to be relatively stable. Squirrel season is from September 3, 2011 through January 31, 2012 with a daily bag limit of six combined (fox or gray) squirrels.

Pheasants

Ring-necked pheasant numbers are declining statewide, and this appears to be the case on IAAAP. In the past, a ring-necked pheasant stocking program occurred as a cooperative effort between the IDNR and IAAAP. Although successful, pen-reared birds experienced high mortality rates when released into the wild. Overall declining habitat and predation appeared to be the primary problems with this bird's recovery. With the pheasant population already in trouble, the past few cold, wet springs have greatly reduced production to the point where pheasants are rarely even seen on the facility anymore.

Furbearers

Furbearers are managed by the IDNR using controlled hunting and trapping for species producing annual surpluses. IAAAP uses state-established furbearer seasons and regulations. In Iowa, furbearers are beaver, badger, American mink (*Neovison vison*), muskrat, raccoon, striped skunk, opossum, weasel (*Mustela sp.*), coyote, river otter, bobcat, and red and gray fox. Although trapping of foxes is permitted by IDNR, it is discouraged by IAAAP due to so few foxes inhabiting the Plant. Trapping and hunting regulations are described in Iowa Hunting and Trapping Regulations, which are published annually by the IDNR.

Trapping of all furbearers is permitted by the IDNR, but only those other than otter, beaver, weasel, mink, and muskrat may be hunted. IAAAP restricts hunting to coyotes, bobcats, and raccoons, and the use of dogs is not permitted. Hunting is only allowed during daylight hours. IAAAP also discourages the trapping of foxes and requires that foxes accidentally caught be released, unless they have broken leg bones. The civet cat (spotted skunk; *Spilogale putorius*) and gray wolf (*Canis lupus*) are completely protected in Iowa.

Fish

Fish management is directed at maintaining a harvestable surplus of game fish. Each pond is managed as its own system and may experience population fluctuations over the short and long terms, stemming from fish harvest, enforced regulations, stocking, fish kills, pond productivity, aquatic weed infestation, etc. The *Iowa Army Ammunition Plant Fisheries Management Plan* (Elkington *et al.* 2010) guides fisheries management on the Plant. Primary species emphasized in the IAAAP fisheries program are bass, bluegill, redear, and catfish.

Fish Harvest Management

Fishing on IAAAP is allowed on Mathes Lake #18, Stump Lake #19, and ponds #04, #23, #32, and #40. Fishing regulations are identical to State limits, except that some IAAAP regulations are more restrictive (daily limits, length limit, etc.). Figure 3.4.2 shows areas open to recreation, including fishing. Regulations, permits, bag limits, procedures, etc., applicable to fishing on the Plant are discussed in Section 4.14, *Outdoor Recreation*.

Fish Population Control

Fish population control for game species consists of recreational harvest, which is managed through bag and other limits established for the Plant. There has been little need for direct control of undesirable species in Plant ponds.

Fish Stocking

Stocking of game species has been performed using recommendations provided by the USFWS through a cooperative agreement on an as-needed basis. If stock is available, the USFWS provides maintenance stocking of walleye and striped bass hybrids in Mathes Lake. Channel catfish are generally stocked in new impoundments or to supplement natural reproduction. Some natural channel catfish reproduction has been noted in Mathes Lake. The installation has occasionally purchased 8-inch or larger channel and flathead catfish (non-vulnerable to predation) for supplemental stocking and to encourage natural reproduction in Mathes and Stump lakes. The USFWS provided fingerling fish to restock Stump Lake following completion of the rehabilitation project in 2002. Smallmouth bass (*Micropterus dolomieu*) have been stocked in the emergency water reservoir, and reproduction has occurred. IAAAP continues to rely on the USFWS for stocking recommendations.

The winter of 2013-2014 was the 9th coldest on record for Iowa. Average temperature in the state for the 3-month period of December, January, and February was 14.7° F. This resulted in massive fish kills for many regional ponds and lakes, including on IAAAP. Shad and carp, which had become a problem, were no longer an issue. The remaining fish population is coming back slowly with the help of restocking and a drop in annual anglers. Prior to the fish kill, approximately 200 anglers a year fished the facility. Since 2013, that number is down to approximately 100 anglers each year.

Other Species

In 1988, IAAAP was used as a transplant site for restoration of Ruffed Grouse (*Bonasa umbellus*); 80 birds were released. This release was marginally successful. In 2000 three different individuals sighted grouse on the installation, which were the last known sightings on IAAAP. Additional transplants are not anticipated.

During 1991 - 1995, 240 Canada Geese were released onto IAAAP by the IDNR. These birds did very well and reproduced. This program was enhanced by the volunteer efforts of the Oquawaka Conservation Club, Illinois, which donated an aerator to keep water open and constructed more than 20 goose nest platforms. This effort no longer requires the support of the Plant.

IAAAP was a participant in the Iowa America wildlife diversity/nongame program by serving as a rearing site for Trumpeter Swans (*Olor buccinator*). Two pairs were put into a fenced area in 1994; one pair survived until the program was discontinued in 1999, due to mission requirements. This pair was relocated from IAAAP to an authorized swan rehabilitator.

The natural resources program has produced excellent habitat for songbirds, raptors, and other nongame bird species. Specific management actions are not undertaken for nongame species, with exception of the bluebird nest box program, and such management is not anticipated during 2018-2023. All nongame mammal, bird, and reptile species, with exception of European starlings (*Sturnus vulgaris*) and house sparrows (*Passer domesticus*), are completely protected by state law. If nongame numbers decline, IAAAP will use research and/or management programs to deal with individual or groups of species.

Rogers (1995) indicated that the forest bird community at IAAAP is dominated by permanent residents and short-distance Nearctic migrants. Nearctic migrants comprise less than half of the most common species during summer. Nearctic migrants steadily drop in abundance on IAAAP as summer progresses. Species diversity of forest and forest-edge birds is high, indicating that habitat requirements are being met on the installation. It is suspected that this is a recent phenomenon considering the relatively young age of most of the forests. Rogers (1995) theorized that IAAAP could be of regional significance to songbird populations in southeast Iowa in that it may be supplying colonists to maintain populations at less suitable sites, such as scattered small forest tracts.

Neotropical Birds

A number of studies have implicated that highly fragmented forests with increased edge, especially agricultural/forest edge, are major factors producing reduced fitness of neotropical migrants. This is due to increased rates of predation and brown-headed cowbird (*Molothrus ater*) parasitism. There is also evidence that food supply varies with fragment size. In Australia, Zanette *et al.* (2000) found that prey biomass was significantly lower in small forest fragments (~55 acres) than in large (>400 acres) fragments. With these factors in play, IAAAP could be a population sink for forest-nesting neotropical migrants.

According to the National Breeding Bird Survey (Sauer 2017), grassland bird populations have shown steeper, more consistent, and more geographically widespread declines than any other guild of North American bird species. Factors that may be contributing to this decline are habitat loss through urbanization, succession, agricultural (haying) and grazing practices, and increased fragmentation and edge.

IAAAP enhances habitat quality for neotropical migrants and nearctic grassland and forest dwelling birds. Priority is given to creating larger blocks of grassland habitat by strategically converting some cool season hay leases to warm season grass hay leases, increasing the size of existing prairies, establishing only “light grazing” leases, and/or retiring low to marginal crop lands and converting them to warm season grasslands. To the greatest extent possible, these areas are connected to establish larger blocks of suitable grassland habitat. If need be, wooded ditches, fence rows, and small isolated woodlots within the grassland area can be removed to reduce perch sites for cowbirds and habitat for predators, such as raccoons.

IAAAP connects blocks of forest patches to reduce forest fragmentation. Indigenous tree species are planted in forest openings, and natural succession is allowed in old fields adjacent to forest blocks. Removing isolated forest patches is also considered if it benefits grassland restoration. The intent is to create larger blocks of higher quality habitat that results in reduced parasitism and predation rates. Any tree removal is done in accordance with the Indiana and northern long-eared bat ESMP. Complete roadside mowing is delayed until September and hay cutting on two hay leases is delayed until after August 15 to support the nesting of birds such as the northern bobolink (*Dolichonyx oryzivorus*).

Reptiles and Amphibians

Reptiles and amphibians are not specifically managed on IAAAP; however, small and shallow water areas are protected to support breeding amphibians on the installation. Fish are not stocked in these water bodies

to improve amphibian breeding success. Vegetation buffers are allowed to develop around these areas as dispersal and travel corridors, and the use of pesticides within or around these areas is avoided.

Populations of reptiles and habitat conditions on the installation are unknown. It is assumed that ample cover and resources exist for snakes, lizards, and land turtles to satisfy food and cover requirements. If certain areas do not provide adequate cover, such as downed logs and wooden debris, cover boards are randomly placed within the area. These can also be used for monitoring purposes. Sufficient habitat exists for aquatic turtles on the installation, and continued protection of these aquatic habitats benefits these turtles.

Agricultural practices, roadways, and human fear of these creatures are probably factors that may affect reptile populations, especially snakes, on IAAAP. An effort is made to educate installation personnel on the benefits of reptiles, especially snakes. The Natural Resources Manager is available for removal or relocation of snakes found in unwanted areas.

Knowledge of installation reptile and amphibian species and populations would benefit from initiation of a monitoring program. This effort could involve early and late spring anuran call surveys, use of drift fences for capture and release, randomly placed cover boards, and visual surveys of aquatic turtles. Over time, a standardized monitoring program would provide valuable information on population trends of reptile and amphibian species and possible environmental health issues at IAAAP. An extensive reptile and amphibian survey should be a part of the next planning level survey which would provide a baseline moving forward.

4.7.2 Proposed Management

Project: Fish and Wildlife Management

Justification: Managing fish and wildlife populations for outdoor recreation (Sikes Act), stewardship

Project Timing: All objectives - ongoing indefinitely

Regulatory Coordination: None required

Change from Current Management: No significant change

Goal 1. Regularly monitor species that are indicators of ecosystem integrity and other special interests.

Objective 1. Perform white-tailed deer data collection through reporting requirements at installation gates.

Objective 2. Perform wild turkey data collection through reporting requirements at installation gates.

Objective 3. Perform small game and fish population data collection through reporting requirements at installation gates.

Objective 4. Monitor other species through incidental observations for abundance and general health.

Goal 2. Maintain fish and wildlife populations at optimal levels in accordance with species priorities, population ecology, population health considerations, and habitat capacities.

Objective 5. Use established hunting seasons, procedures, methods, etc. to maintain white-tailed deer and turkey populations at or slightly below carrying capacities.

Objective 6. Maintain small game and furbearers within habitat carrying capacities.

Objective 7. Manage fisheries resources to maintain a harvestable surplus and use recreational harvest to manage game fish populations.

Objective 8. Stock fish to support recreational fishing use as funding allows.

Objective 9. Investigate options and/or regional facilities (commercial operations) to procure fish for stocking.

Objective 10. Consider neotropical migrants and nearctic grassland and forest dwelling birds in grassland and forest habitat management.

Objective 11. Protect small and shallow water areas as reptile and amphibian habitats; ensure ample cover and resources exist for snakes, lizards, and land turtles to satisfy food and cover requirements; and educate installation personnel on benefits of reptiles, especially snakes.

Objective 12. Investigate the feasibility of additional surveys for nongame birds, reptiles, and amphibians on IAAAP with emphasis on species of concern as funding, personnel, and time allows.

4.8 Rare and Listed Species Management

Sections 3.3.2.3, *Special Status Flora* and 3.3.3.2, *Special Status Fauna* discuss the status of species that are federal and/or state endangered, threatened, or species in need of conservation at IAAAP. These sections also discuss surveys performed on IAAAP for threatened and endangered species.

4.8.1 Federally-listed Species Management Practices

The ESA of 1973, as amended (Act) requires lands under the jurisdiction of the Department of the Army to conserve listed species (Section 7(a)(1) of the Act). As defined in the Act, conservation is the use of all methods and procedures necessary to bring any listed species to the point where protections provided by the Act are no longer necessary. Section 7(a)(2) of the Act requires the Army to ensure that its actions do not jeopardize the continued existence of any endangered or threatened species, and sections 7(a)(3) and 7(a)(4) require the Army to consult and confer with the USFWS if any Army action may affect a listed species.

AR 200-1 (Department of the Army 2007) states (Section 4.3.d(5)) that the Army has the following program requirements for threatened and endangered species.

- (a) Prepare and implement an Endangered Species Management Component to the INRMP consistent with current policy and guidance.
- (b) Carry out mission requirements in compliance with the ESA.
- (c) Integrate endangered species management in installation planning functions to ensure compliance with the ESA.
- (d) Take appropriate actions to conserve suitable habitat in order to preclude the need for critical habitat designation.
- (e) Assess all activities (to include Military Construction) at the earliest opportunity to determine whether they may affect listed species or critical habitat.
- (f) Coordinate threatened and endangered species actions or issues with commanders and other tenants that may be affected by them.
- (g) Conduct biological assessments for activities that may affect listed species or critical habitat where they are present, or may be present in the action area.

- (h) Informally consult with the USFWS; document the results in writing; and if necessary, conduct a biological assessment or biological evaluation to assess whether an action may affect a listed species or critical habitat. If the action is likely to adversely affect the listed species or its habitat, formal consultation with USFWS is required. If the action is not likely to adversely affect the listed species or its habitat, and the USFWS concurs in writing, formal consultation is not required.
- (i) Coordinate with affected installation organizations and higher headquarters prior to initiating formal consultation.
- (j) Confer with the USFWS on any action that is likely to jeopardize the continued existence of any proposed species or result in the destruction or adverse modification of proposed critical habitat.
- (k) Review all ongoing and proposed actions immediately upon listing of a threatened or endangered species or designation of critical habitat to determine if formal consultation is necessary (even if a conference has previously occurred).
- (l) Complete a Biological Evaluation before initiating formal conference on actions affecting a proposed species or proposed critical habitat.
- (m) Develop and implement strategies to promote, in cooperation with other landowners, the use of conservation banking and/or Army Compatible Use Buffer initiatives to minimize impacts of an action on threatened and endangered species and/or critical habitat.
- (n) Within 24 hours, report ESA violations, by telephone or electronic means, through the chain of command to Headquarters, Department of the Army. Submit a follow-up written report within 7 days.
- (o) Coordinate with higher headquarters and Headquarters, Department of the Army in taking final action to correct any endangered species management problems contributing to ESA violation(s).
- (p) Ensure that threatened and endangered species awareness is included in unit training for personnel who may come in contact with listed species and/or their habitats or critical habitat. Coordinate training with the installation engineer, environmental directorate, and Integrated Training Area Management sustainable range component.
- (q) Obtain Headquarters, Department of the Army approval before supporting USFWS's introduction and/or reintroduction of Federal and State listed, proposed, and candidate species on Army lands.
- (r) Protect water rights necessary for the survival and recovery of listed, proposed, or candidate aquatic or riparian species. Coordinate all water rights issues with appropriate legal counsel.
- (s) Participate in the listing/delisting process, recovery plan development, and critical habitat designation where the species in question may impact installation military missions.
- (t) Cooperate with State and local authorities in the management of Assistant Chief of Staff for Installation Management-designated Army species at risk and habitats with the goal of avoiding listings that could adversely affect military readiness.
- (u) Participate in regional/habitat-wide efforts to conserve candidate and Assistant Chief of Staff for Installation Management-designated Army species at risk and habitats when it has the potential to benefit the Army.
- (v) Include State-listed species in the installation INRMP.

IAAAP is committed to these program requirements.

4.8.1.1 Current Management

Indiana and Northern Long-Eared Bat

The Indiana and northern long-eared bat are the only federally-listed species known to occur on IAAAP. The northern long-eared bat was listed in April of 2015 and was not covered by the previous INRMP. However, IAAAP did revise its ESMP in 2015 to cover both bat species. Management for these species is via the *Endangered Species Management Plan for the Indiana Bat, Myotis sodalis, and Northern Long-Eared Bat, Myotis septentrionalis, Iowa Army Ammunition Plant, Des Moines, Iowa* (Stantec 2015). The ESMP specifies management prescriptions for forest management; agricultural management; construction, demolition, and environmental remediation; training exercises; hunting and other outdoor recreation; operating contractor activities; test firing; and monitoring of the Indiana and northern long-eared bat and its habitat, implementing an awareness program, and communicating with the USFWS. Compliance with the ESMP is evaluated through an annual compliance checklist, which the IAAAP Natural Resources Manager completes.

The ESMP specifies that minor updates should be completed annually and major revisions once every five years, or as required. The primary update/revision is for the total estimated cost of conservation actions and the estimated level of effort and cost by management prescription. A supplement updating this information is in Appendix 4.8.1.1. The ESMP is also incorporated into the INRMP by reference.

White-nose syndrome is a disease associated with the *Geomyces destructans* fungus that is rapidly spreading south and west across North America and causing unprecedented mortality of hibernating bats in the United States. White-nose syndrome may be transmitted in two ways: bat-to-bat transmission is believed to be the primary route, and circumstantial evidence suggests humans may inadvertently carry it from site-to-site. DoD Memorandum (September 20, 2011), *Interim Policy on Management of White Nose Syndrome in Bats* includes strategies to help combat the spread of white-nose syndrome. IAAAP will implement, to the extent feasible and appropriate, these strategies. White-nose syndrome occurrence is suspected in Missouri about 100 miles south of IAAAP (www.nwhc.usgs.gov/disease_information/white_nose_syndrome 2011).

Bald Eagle

The Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), enacted in 1940 and amended several times since then, prohibits anyone, without a permit issued by the Secretary of the Interior, from “taking” bald eagles, including their parts, nests, or eggs. The Act provides criminal penalties for persons who “take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof.” The Act defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” Federal agencies are required to support the intent of the Bald and Golden Eagle Protection Act by integrating conservation principles, measures, and practices into agency activities and by avoiding or minimizing, to the extent practicable, adverse impacts on eagles when conducting agency actions.

The USFWS has developed National Bald Eagle Guidelines (May 2007). In developing these guidelines, USFWS relied on existing state and regional bald eagle guidelines, scientific literature on bald eagle disturbance, and recommendations of state and federal biologists who monitor impacts of human activity on eagles. Despite these resources, uncertainties remain regarding effects of many activities on eagles and how eagles in different situations may or may not respond to certain human activities.

Bald eagles (formerly federally-threatened) documented on IAAAP are transients. Bald eagles have been observed foraging on the Plant and are occasionally found at Mathes Lake. A bald eagle nest is known to

occur south of the Plant on the Skunk River. Management specific to the bald eagle on IAAAP is not warranted at this time.

No other federally-listed fauna is known to use IAAAP. No faunal species on IAAAP are proposed or candidates for federal listing. Management activities described in other sections of this INRMP, such as 4.6 - *Habitat Management*, 4.9 - *Special Interest Area Management*, 4.10 - *Agricultural Outleasings*, and 4.13 - *Fire Management*, are performed in accordance with requirements of the ESMP and benefit flora and fauna in general.

Critical Habitat

Within the spirit and intent of the Sikes Act Amendments of 1997 and the ESA (as amended by Section 318, Military Readiness and Conservation of Protected Species, National Defense Authorization Act of 2004), this INRMP serves to provide *adequate management or protection*, a term that originated in the definition of occupied habitat from Section 3 of the ESA. If *adequate management or protection* is already in place, then additional special management (*i.e.*, critical habitat designation) is not required when lands are found to contain physical and biological features essential to the conservation of the species. *Adequate management or protection* is provided by a legally operative plan that addresses the maintenance and improvement of primary constituent elements important to the species and manages for the long-term conservation of the species. This reasoning leads to the conclusion made by the USFWS and adopted as internal policy that, where applicable, federal critical habitat designation is not warranted if the INRMP includes the following three criteria:

1. **The plan provides a conservation benefit to the species.** Cumulative benefits of the management activities identified in a management plan, for the length of the plan, must maintain or provide for an increase in a species' population or the enhancement or restoration of its habitat within the area covered by the plan [*i.e.*, those areas deemed essential to the conservation of the species]. A conservation benefit may result from reducing fragmentation of habitat, maintaining, or increasing populations, ensuring against catastrophic events, enhancing and restoring habitats, buffering protected areas, or testing and implementing new conservation strategies.
 - Flora and fauna inventory and monitoring, habitat management, wildlife population management, non-game species protection, and numerous other projects discussed in this INRMP will provide a cumulative conservation benefit to federally-listed species on IAAAP.
2. **The plan provides certainty that the management plan will be implemented.** Persons charged with plan implementation are capable of accomplishing objectives of the management plan and have adequate funding for the management plan. They have the authority to implement the plan and have obtained all necessary authorizations or approvals. An implementation schedule (including completion dates) for the conservation effort is provided in the plan.
 - The Commander has the authority to implement the INRMP, which will be accomplished primarily by the Natural Resources Manager, as scheduled (Appendix 7.4, *Project/Program Summary*) and budgeted (Section 7.5, *Implementation Funding Options* and Section 7.6, *INRMP Implementation Costs*).
3. **The plan provides certainty that the conservation effort will be effective.** The following criteria will be considered when determining the effectiveness of the conservation effort. The plan includes (1) biological goals (broad guiding principles for the program) and objectives (measurable targets

for achieving the goals); (2) quantifiable, scientifically valid parameters that will demonstrate achievement of objectives and standards for these parameters by which progress will be measured are identified; (3) provisions for monitoring and, where appropriate, adaptive management; (4) provisions for reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided; and (5) a duration sufficient to implement the plan and achieve benefits of its goals and objectives.

- Goals, objectives, and long-term ecosystem needs, based on land use sustainability for the IAAAP mission, have been analyzed and considered extensively in collaboration with persons contacted while preparing this plan. Goals and objectives are defined for the plan as a whole (Section 1.1, *Natural Resources Mission, Goals, and Objectives*) and each project within the plan (chapters 4, 5, and 7, as summarized in Appendix 7.4, *Project/Program Summary*). The INRMP will be evaluated through monitoring programs, including the Environmental Performance Assessment System, the Environmental Quality Report, and reviews by the Joint Munitions Command and other interested parties.

No critical habitat has been proposed or designated on IAAAP.

4.8.1.2 Proposed Management

Project: Federally-listed Species Management

Justification: ESA and the ESMP

Project Timing: Objective 3 - 2020, other objectives - ongoing

Regulatory Coordination: U.S. Fish and Wildlife Service

Change from Current Management: No significant change

Goal. At a minimum, sustain residential populations of endangered, threatened, or special status species and their habitats, with the long-term goal of conserving listed species and their habitats in accordance with specific Recovery Plans and the ESA.

Objective 1. Implement requirements of the ESA, as stated by AR 200-1.

Objective 2. Implement Indiana and northern long-eared bat management prescriptions specified in the ESMP (Stantec 2015).

Objective 3. Update the IAAAP Endangered Species Management Plan.

Objective 4. Survey for other federally-listed species as funding permits.

Objective 5. If species other than the Indiana and northern long-eared bat that are federally-listed are discovered on IAAAP, or if species already known on the Plant become federally-listed, consult with the USFWS and develop an inventory/monitoring program and management plan for these species.

4.8.2 Other Special Status Species Management

The USFWS Birds of Conservation Concern include species that are of concern because of (a) documented or apparent population declines, (b) small or restricted populations, or (c) dependence on restricted or vulnerable habitats. These birds are listed with the intent of avoiding future designations of these species under the ESA. The most recent USFWS report (2008) lists 276 species, nationwide.

IAAAP is in Bird Conservation Region 22, which lists 35 birds of conservation concern, 11 of which are documented on IAAAP. Species listed as game birds, below desired condition, and known to occur at IAAAP are the mourning dove, American woodcock, mallard (*Anas platyrhynchos*), and wood duck. A species listed as a non-migratory bird species of concern and occurs on IAAAP is the northern bobwhite quail (www.dodpif.org 2011).

4.8.2.1 Current Management

Army regulations require consideration of state-listed species in all Army actions. Six state-listed threatened vascular plant species have been identified on IAAAP. These are discussed further in Section 3.3.2.3, *Special Status Flora*. Section 3.3.2.3 also identifies two species, green fringed orchid and southern Adder's-tongue fern, which may become state listed as endangered on an upcoming revision of the state list of threatened and endangered species. Field work documenting these species on IAAAP is more than twenty years old, thus, a revisit to last known locations and areas of similar habitat should be accomplished. One state-listed special concern and three state-listed threatened faunal species have been documented on IAAAP. These are discussed further in Section 3.3.3.2, *Special Status Fauna*.

IAAAP understands the importance of sensitive species that may not be federally-listed, particularly since these species have the potential to become federally-listed, potentially affecting the military mission. Thus, even though it is more difficult to justify funding specifically for the management of these species, IAAAP will protect and manage them as funding permits.

4.8.2.2 Proposed Management

Project: Nonfederally-listed Species Management

Justification: Stewardship

Project Timing: All objectives - ongoing indefinitely

Regulatory Coordination: None required

Change from Current Management: No significant change

Goal. Monitor and manage nonfederally-listed, special status plant and animal species on IAAAP to the degree possible with available staffing and funding.

Objective 1. Consider state-listed and Birds of Conservation Concern species in all IAAAP actions.

Objective 2. Whenever possible, use actions designed for federally-listed species to protect or manage other sensitive species.

Objective 3. Resurvey last known locations and areas of similar habitat of state threatened, endangered, or species of concern, and/or species that may be listed in the near future.

4.9 Special Interest Areas Management

4.9.1 Current Management

DoD Instruction 4715.03 (Department of Defense 2011) requires INRMPs to address the management of special interest areas. Designation of special protection status for unique or fragile areas is an important management tool. It is more cost effective to minimize damage or disturbance than to mitigate damage or disturbance. For example, damage to exotic species-dominated grasslands is generally easier to repair than damage to native grasslands. Thus, it makes both biological and economic sense to provide a higher degree of protection for the little remaining native grassland than for the more prevalent annual grasslands.

IAAAP has some small areas of relatively undisturbed native prairie remnants. Prairie areas on IAAAP are discussed further in Section 4.6.1.3, *Terrestrial Habitat Management*, under *Prairie Areas*. Wetlands are another resource of special interest on the installation and their management is described in Section 4.6.1.2, *Wetland Management*.

4.9.2 Proposed Management

A specific project for management of special interest areas on IAAAP is not necessary as these areas are included in other sections of the INRMP. Implementation of Land Use Control Procedures (discussed in Section 4.2, *Ecosystem Management Coordination and Planning*) and installation of physical barriers to protect sensitive resources (discussed in Section 5.3, *Cultural Resources Protection*) support special interest areas management on IAAAP.

4.10 Agricultural Outleases

AR 200-1 (4-3d(2)(a-b) and 4-3d(8)(b) and (j)(2)) (Department of the Army 2007) requires the following with regard to leases.

- Address leases within the INRMP.
- Ensure all conditions of leases are consistent with the military mission and natural resources conservation and protection.
- Routinely examine Army land to determine what areas, if any, are available for outleasing.
- Use revenues from agricultural/grazing outleases only for reimbursement of administrative costs of outleasing and other expenses incurred in support of multiple-land use management of natural resources.

4.10.1 Current Management

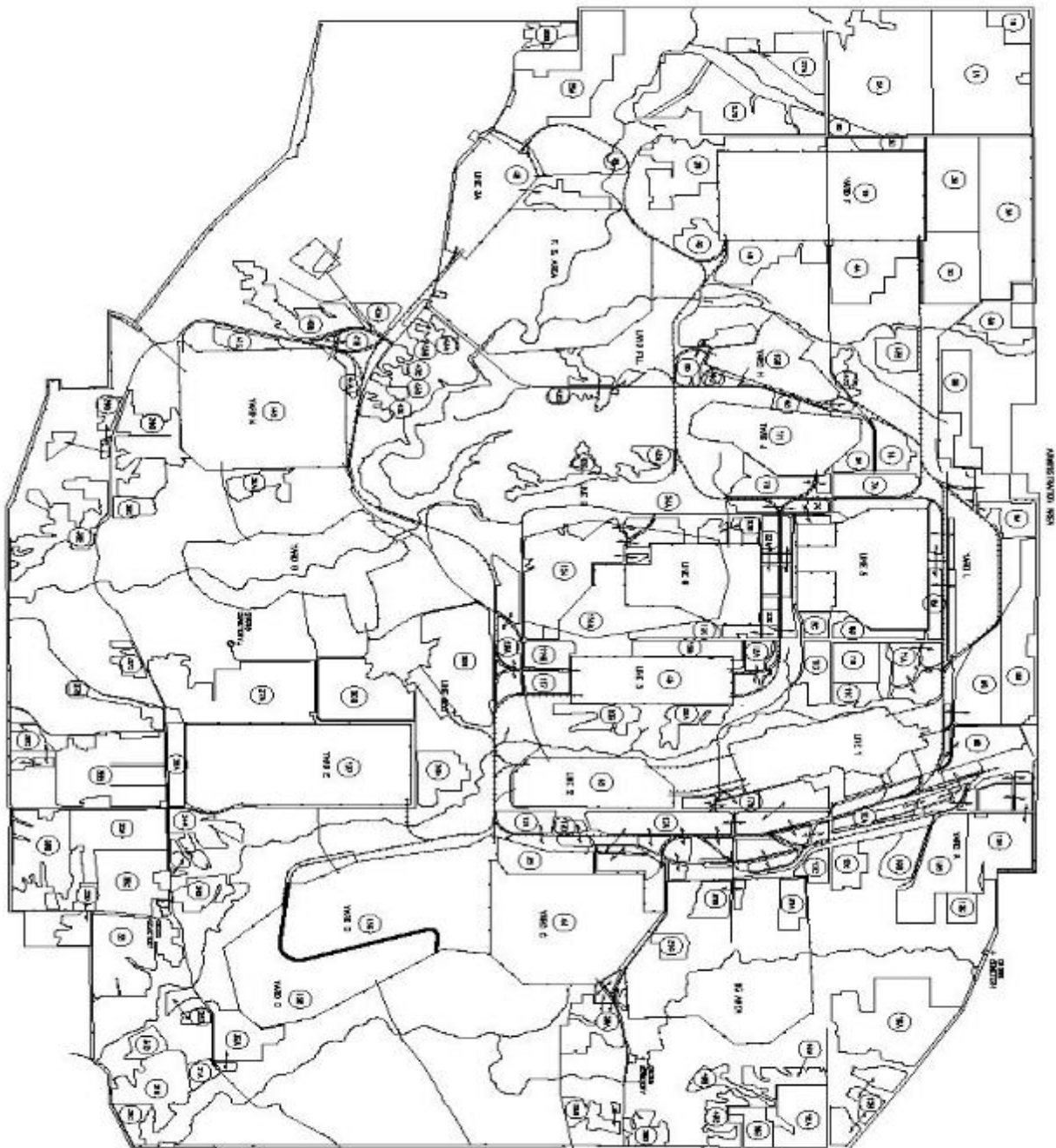
General

IAAAP has one of the Army's largest agricultural programs. Agricultural programs include row crops, hay, and cattle grazing. Some agricultural land has been converted to native grass prairie.

Agricultural leasing is the major commercial land use on IAAAP dating back to 1943. These leases generate considerable revenue for natural resources management, support ecosystem functionality (*e.g.*, maintaining soil resources, maintaining edge habitat, control noxious weeds, prevent woody plant encroachment in grasslands), provide options for wildlife management and associated recreation, enhance security, and provide services needed by the Plant (*e.g.*, mowing).

There are 43 crop leases on IAAAP (Figure 4.10.1). All new leases are for a maximum of five years, and 9 - 14 leases are up for renewal annually. Tract management plans are drawn up by the Natural Resources Manager and once approved are submitted to the USACE for issuance. Each lease is unique but deals with the same management issues (*e.g.*, pest management, cultural resources). Each lease has a tract management plan, as required by the Farm Bill (the Federal Agricultural Improvement and Reform Act of 1996 (FAIR)). Leases on highly erodible lands also have conservation compliance plans.

Figure 4.10.1 Land Leases on Iowa Army Ammunition Plant



There are about 5,200 acres of agricultural row crops on the installation. Primary crops are corn and soybeans. Other crops include alfalfa hay and small amounts of wheat and oats. Most sites can be continually row-cropped. Fertilizer and lime are applied by the Plant to all agricultural land through a contract, but lessees apply nitrogen as needed. Some agricultural areas on the installation are experiencing the breakdown of tile drainage systems. These systems have been replaced as needed to allow continued agricultural activities.

Rotational farming practices have been established on agriculture fields on IAAAP, and minimum-till farming is practiced. Typically, this type of farming uses methods of growing crops that involve little seedbed preparation. In 2017, IAAAP is implementing the use of aerial seeding of cover crops to further protect soils. A total of 2,063 acres will receive aerial application of cover crop seed. In Iowa, planting a cover crop after harvest has proven to produce less than desired results including failed plantings due to delayed harvest, lack of timely rain fall, frost, etc. As such, cover crop seed will be aurally applied into standing row crops prior to harvest. It is expected that this program will help reduce soil erosion from wind and water, increase overall soil health, and reduce the need for commercial fertilizers over time.

Persons operating on or leasing land at IAAAP are subject to all installation and government safety and security regulations. Penalties for violations of regulations may consist of verbal or written warnings, written reprimand, denial of entrance, fines, lease cancellations, or any combination thereof, depending upon the seriousness of the violation (IAAAP 2006).

Hay and Grazing Areas

There are 10 leases where grazing and/or haying can be conducted, which consist of about 2,300 acres of the installation (Figure 4.10.1). Lessees have the option to graze and/or cut and bale the areas. Two areas are hay-only areas due to the susceptibility of earth-covered magazines to damage by cattle. All areas are primarily in tall, smooth brome grass. Five grazing/hay areas are within ammunition storage areas; three are fenced pastures in areas not suitable for row crops; and the other is hay-only in an ammunition storage area. IAAAP has begun to phase out grazing leases as they expire for areas with magazines due to maintenance issues. The areas around magazines are being converted to hay areas and the magazines themselves are being otherwise maintained by IAAAP. The Plant still allows grazing but not to the same degree as in the past.

The grazing program has relatively minor effects on the overall IAAAP mission, especially considering the few areas affected. There is minor surface water pollution due to cattle getting into water and depositing excreta. Biodiversity is limited in these areas due to the predominance of one grass species. Trapping is allowed in storage yards but interaction is minimal. There is no military training in any areas within this program. The agricultural program maintains about 12 miles of gravel road providing an annual cost avoidance of \$75,000 to \$100,000.

Each tract of land has a grazing plan. Cattle are grazed at a rate of one animal unit per 2 - 3 acres. An animal unit is a cow/calf or a bull, and a heifer is 0.75 animal units. Grazing is permitted during May through November.

The grazing program depends on monitoring numbers of cattle grazed. The Natural Resources Manager monitors cattle on an opportunistic basis or when there is any reason to believe that numbers might be excessive. All pasture tracts in the leased areas have had some soil remediation activities completed in the past. Water for the cattle is provided through farm ponds and small watercourses.

4.10.2 Proposed Management

Project: Agricultural Outlease Management

Justification: Compliance with Sikes Act and Department of Defense policies

Project Timing: Ongoing

Regulatory Coordination: None required

Change from Current Management: Moderate change; Aerial seeding of cover crop program

Goal. Provide opportunities for agricultural use of IAAAP when consistent with the military mission and native ecosystem functionality.

Objective 1. Update the Agricultural Land Use Regulations and individual tract management plans as needed to manage grazing, hay, and crop production activities on IAAAP.

Objective 2. Ensure that requirements of the Agricultural Land Use Regulations and individual tract management plans are followed.

Objective 3. Continue to apply fertilizer and lime to agricultural crop areas through a contract.

Objective 4. Repair or replace tile drainage systems as necessary.

Objective 5. Harden or otherwise improve access roads for agricultural and recreational purposes.

Objective 6. Manage and protect land resources on IAAAP while maximizing land use and providing an economic resource to the natural resources program through agricultural outleases.

Objective 7. Include planning and NEPA analysis in agricultural outlease decisions.

Objective 8. Implement, monitor, and adjust (as/if necessary) aerial seeding program in order to evaluate and improve its effectiveness on soil conservation.

4.11 Pest Management

4.11.1 Current Management

Responsibility for pest management on IAAAP is tripartite between the American Ordnance Pest Manager, the Natural Resources Manager, and agricultural lessees. The Natural Resources Manager is responsible for oversight of the pest management program and noxious weed control inside agricultural and forested areas. Other responsibilities include updating the Integrated Pest Management Plan (IAAAP 2013) and submission of pesticide use to Army Environmental Command. A copy of the Integrated Pest Management Plan is on file in the Natural Resources office and is incorporated into the INRMP by reference.

American Ordnance LLC is responsible for pest management activities within all improved areas included in the facilities use contract. These include structural pests and vegetation that would interfere with production activities or would otherwise degrade facilities. American Ordnance LLC uses state-certified pest applicators.

Agricultural lessees are responsible for control of weeds and brush on their leases. This is limited to requirements outlined in the Agricultural Land Use Regulations and special considerations requirements of individual leases. To apply pesticides, either the agricultural lessee is state-certified or the lessee uses state-certified applicators.

Most of the below discussion is based on the IAAAP Integrated Pest Management Plan (IAAAP 2012). This plan should be reviewed annually. The pest management plan identifies and prioritizes pests and their destructive effects to determine levels of protection.

Integrated pest management is used at IAAAP, and typically a combination of integrated pest management techniques is required to resolve a problem on a sustained basis. IAAAP uses an integrated pest management approach (strategy) to pest control or prevention that considers various methodologies that incorporate both chemical (pesticides) and nonchemical controls; physical (barriers), biological suppression techniques (biological), the habitat of the pest (cultural), traps or glueboards (mechanical), and the interrelationship between pest populations and the ecosystem. Integrated pest management includes the implementation and coordination of optimum sanitation, good structural design and maintenance of facilities. The integrated pest management comprehensive approach to pest control or prevention, using methods of pest control in a compatible manner, avoids damage and minimizes adverse side effects to nontarget organisms and the environment.

The IAAAP pest management program is consistent with the directive and measures of merit to reduce pesticide use by using integrated pest management. IAAAP only uses chemical control when non-chemical techniques are inadequate or impractical. Furthermore, chemical control will not be used as a substitute for good sanitary practices or proper building maintenance. All chemicals used on IAAAP are USEPA-approved.

Undesirable vegetation often occurs near fire hydrants, around building foundations, and along sidewalks, fence lines, and other paved areas. It is difficult and expensive to regularly use weed eaters in these areas. Therefore, some areas are treated with chemicals, which provide relatively long-term control. In some cases, unwanted vegetation near paved areas can be bladed with a road grader. This technique is commonly used on road shoulders and open ground storage sites.

Reduced chemical use is a goal of the pest management program. The Plant understands both obvious and long-term threats to humans and ecosystem functions from chemical abuses. Emphasizing surveillance before chemical application and using more efficient equipment and techniques to reduce chemical volume and toxicity will help ensure that threats are minimized.

There have been significant reductions in the use of agricultural pesticides on IAAAP. According to lessee-supplied data, amounts of active ingredients have been reduced due to improved application techniques and new chemicals. The degree of reduction of pesticide use within the cantonment area is likely to be more than in agricultural areas.

Pesticide application is managed to enhance wildlife habitat and to protect the environment and public health. Wetlands require special precautions when applying pesticides. The possibility of federal- and state-listed species occurring on IAAAP requires that special precautions be followed closely during any pest management activities that could affect these species. Most migratory bird species are federally protected.

To ensure that environmental issues are considered when applying pesticides, IAAAP follows precautionary statements on labels regarding contamination of water when pesticides are sprayed near wetlands. IAAAP takes special precautions during pest management activities that could affect special status species and coordinates and obtains approval of the USFWS for bird control activity, except for unprotected species.

The IAAAP Integrated Pest Management Plan (2012) discusses many aspects of pest management that are not directly within the scope of this INRMP, such as control of disease vectors and protection of facilities.

Invasive Plants

AR 200-1 (4-3d(10)(a) and (c)-(f)) (Department of the Army 2007) requires the following with regard to noxious weeds and invasive species management.

- Prepare and implement an invasive species management component of the INRMP consistent with specific Federal or State initiatives.
- Conduct mission activities in a manner that precludes the introduction or spread of invasive species.
- Do not use invasive species in installation landscaping or land rehabilitation and management projects.
- Use the most effective and environmentally sound approach for controlling invasive species, to include the use (or reduction in use) of pesticides.
- Assure that the INRMP and Integrated Pest Management Plan are in concert regarding noxious weeds management.

Non-native and/or noxious weeds pose threats to native habitats, sensitive species, and plant community composition and diversity. More specifically, they threaten wetland ecosystems, complicate land management projects, add to the cost of pest management, and in general, threaten ecosystem functionality. IAAAP is dedicated to the prevention or introduction of invasive species as well as their control, per Executive Order 13112, *Invasive Species*.

Musk thistle is the primary noxious plant found on the Plant. This species is controlled by seed head weevils, which is augmented with herbicide treatment when these insects fail to control large stands of the thistle. Multiflora rose is also considered a noxious weed, and elimination of this plant is through naturally occurring rose rosetta disease, which is present on the installation, and through the use of herbicides. Other invasive plants include, but are not limited to, non-native honeysuckles, garlic mustard, teasel, bar berry, and tree-of-heaven. Control of these species is discussed in Section 4.6.1.3, *Terrestrial Habitat Management*, under *Invasive Species Control*.

Tetra Tech EM Inc. (2003) conducted an invasive species survey of IAAAP, which focused on determining the extent of the garlic mustard infestation within forested areas. Garlic mustard was found in the Long Creek and Anderson Creek watersheds and in two unnamed tributaries. A total of 44 invasive plant species were documented, including 14 woody species and 30 herbaceous species (Tetra Tech EM Inc. 2003). Garlic mustard is now known to be in most forested areas on IAAAP.

Animal Pests

IAAAP (2012) includes discussions of animal pest control requirements. Typical animal pests include feral and stray cats and dogs, raccoons, bats (in buildings), pigeons (*Columba livia*), and other birds. Typical control involves trapping and relocation. Pigeons, house or english sparrows, and European starlings are three bird species that occur on the Plant that are not protected under the MBTA. To implement any action that impacts protected birds, their nests, eggs (hatched or unhatched, egg shells, bird parts, etc.) requires coordination with and possibly a permit issued by the USFWS.

4.11.2 Proposed Management

Project: Pest Management Support

Justification: Compliance with Executive Order 13112, *Invasive Species*; compliance with Presidential directive; stewardship

Project Timing: Objective 1, 2021, all other objectives - Ongoing

Regulatory Coordination: None required

Change from Current Management: No significant change

Goal. Control plant and animal species that affect natural resources management (*e.g.*, reduce ecosystem functionality, displace native species) or directly affect the military mission on IAAAP.

Objective 1. Maintain an updated Integrated Pest Management Plan on a five-year cycle.

Objective 2. Emphasize integrated pest management techniques to reduce the use of pesticides.

Objective 3. Ensure pesticide applicators are fully certified, including sending the Natural Resources Manager to the Pest Management Quality Assurance Evaluator course.

Objective 4. Control nuisance wildlife as needed to protect facilities and infrastructure and to support the military mission.

Objective 5. Prevent the introduction of, and control invasive species, per Executive Order 13112, *Invasive Species*.

4.12 Cantonment Area Management

4.12.1 Current Management

Management of cantonment areas (administrative and production areas) on IAAAP is under the facility use contract. Primary objectives of grounds maintenance in developed areas are to maintain an aesthetically pleasing area, enhance safety and security, and maintain natural ecosystem functions as much as possible. In managing natural resources in developed areas, IAAAP acknowledges its responsibilities as listed in the White House Memorandum, *Environmentally and Economically Beneficial Practices on Federal Landscaped Grounds* (Office of the President 1994). The memorandum's requirements include:

- using regionally native plants for landscaping;
- using construction practices that minimize adverse effects on the natural habitat;
- reduce pollution by reducing the use of fertilizer and pesticides, using integrated pest management, recycling green waste, and minimizing runoff;
- implementing water-efficient practices; and
- creating demonstrations of these practices to promote their use elsewhere.

4.12.2 Proposed Management

A specific project for grounds maintenance support by the Natural Resources Manager is not required.

4.13 Fire Management

AR 200-1 (4-3d(12)(a)-(d)) (Department of the Army 2007) requires the following with regard to wildland fire management.

- Reduce wildfire potential using appropriate management practices, such as prescribed burning, firebreak maintenance/construction, etc.
- Installations with wildfire hazards and/or utilize prescribed burns as a land management tool will develop and implement an Integrated Wildland Fire Management Plan that is compliant and integral with the INRMP.
- Assure that all civilian, contractor, and emergency services personnel involved in wildland fire management possess the level of training and physical fitness needed for their expected level of involvement.
- Ensure that only qualified personnel conduct prescribed burns.

General

In comparison to some woodlands and grasslands under private and public ownership, IAAAP has a greater fire occurrence potential. This is due primarily to the required use of the area by a large number of personnel engaged in military mission operations and recreational activities. The ammunition production and storage mission of IAAAP makes the mission of providing adequate fire protection more complex and perhaps costlier than operations on other areas.

American Ordnance LLC has a fulltime Fire Department that is responsible for fire protection on IAAAP. The Fire Department is responsible for conducting prescribed burns, in coordination with the Natural Resources Manager, and controlling wildfires on the Plant.

Types of Fires

Fire is both a threat to natural resources and, if used properly, a valuable ecosystem management tool. All fires can be classified as either wildfire or as prescribed fires. Wildfire is a free-burning fire requiring suppression. Wildfires burn with intensities capable of causing loss of life, detrimental impacts to natural resources, and damage to or destruction of man-made developments. Prescribed fires are the managed application of fire resulting from either planned or unplanned ignition. These fires are conducted in predetermined areas to produce the intensity of heat and rate of spread required for accomplishment of specific management objectives.

Below sections describe means used by IAAAP to protect natural and human resources from wildfires and use fire to ensure continued ecosystem functionality.

4.13.1 Current Management

4.13.1.1 Integrated Wildland Fire Management Plan

The Natural Resources Manager is designated the Installation Wildland Fire Program Manager. IAAAP has an updated Integrated Wildland Fire Management Plan, which is integrated into this INRMP as Appendix 4.13.1.1. The plan provides general policy and supports fire management sections of the INRMP. The IAAAP Integrated Wildland Fire Management Plan will be updated and further refined to meet the needs of IAAAP during the next five years.

Mason & Hanger Corporation (1986) reported that there had been no reported woodland fires on IAAAP since acquisition. That remains true today. The IAAAP Fire Department is responsible for preventing and suppressing wildfires.

Prescribed burning maintains fuel loading at reasonable levels; response time is rapid; and personnel and equipment are readily available to suppress (or manage) wildland fires. Thus, the IAAAP Integrated Wildland Fire Management Plan has some exceptions to the Army Wildland Fire Policy Guidance, which is within the authority of the IAAAP Commander.

4.13.1.2 Wildfire Management

Prevention

Strict adherence to fire-related restrictions on IAAAP minimizes the number of human-caused fires. Smoking by recreational users within the installation is not allowed, and items, such as flame producing devices (matches, lighters, flame-initiated hand-warmers, etc.) explosives, and explosive devices, are considered contraband on the installation.

Publicity

It is important to minimize the potential for wildfires. To accomplish this, installation personnel and those who visit IAAAP are made conscious of the need for fire prevention.

Prescribed Burning

Using prescribed fires to reduce fuel loads creates conditions that make it difficult for a wildfire to start and spread. Should a wildfire occur within about three years following a prescribed burn, the fire will not burn as intensely and is much easier to contain due to the limited fuel buildup.

Containment/Suppression

Containment of wildfires is the responsibility of the IAAAP Fire Department. Fire suppression is provided by the Fire Department, which is manned fulltime during active production periods and equipped with structural, brush, and grass fire fighting apparatus. Fire fighters are trained in wildfire suppression. An all terrain vehicle equipped with a water tank is available to access more remote areas of the Plant and various hand tools are carried on trucks to allow suppression in areas inaccessible to vehicles. Mutual aid agreements have been developed with several local fire departments.

Firebreaks

IAAAP has less than one mile of 35-foot wide firebreak that is disked annually. This firebreak is within the test fire facility area. Firebreaks are rough disked and generally revert to green grass cover soon after diskings, which minimizes soil erosion.

Roads, railroads, agricultural fields, mowed areas (especially along fences), streams, and other wet areas act as firebreaks, giving the installation an extensive firebreak system. Vegetation is mowed on each side of chain link fences for security from June through September, and vegetation under power and steam line rights-of-way is periodically cut. Changes to this system are not planned.

4.13.1.3 Prescribed Burning

Prescribed burning is planned fire applied to a predetermined area under strict guidelines and parameters for ecosystem restoration, sensitive species habitat improvement, fuel reduction, control of undesirable species, and wildlife habitat improvement. IAAAP had many years of fire suppression management on an area that was originally prairie grassland. This prairie evolved with fire as a regular component of the ecosystem. Changes in the vegetative composition and, perhaps more important from a fire perspective, the fuel load have altered the area.

The fuel load on IAAAP is high and potentially dangerous in some areas, especially considering safety issues associated with the Plant's mission. Native vegetation is being crowded out by such species as eastern red cedar, which is beneficial to wildlife only if it is in the proper proportion. Additionally, prescribed burning is one of the most cost effective and efficient management tools available to managers for improving the overall nutritional quality of wildlife habitat.

During the mid-1990s IAAAP initiated a limited prescribed burning program emphasizing burning open areas during periods when fires could be kept cool and tightly controlled. Objectives were to prepare seedbeds for native grasses, manage prairies grasses, and provide timber stand improvement. Periodic burning is especially important on unmowed uplands, which are dominated by brome grass. The emphasis on returning lands to native prairie necessitates burning prior to seeding, at least twice, which is important to prepare the seedbed. This is especially true of sites dominated by brome grass. About 60 acres of brome grass were burned for this purpose in 1995. Following prairie establishment, it is important to periodically burn these areas to maintain prairie ecosystems. From 20 to 60 acres are planned for burning annually on IAAAP, mostly to restore and maintain prairie areas. Burning for timber stand improvement has been limited.

The installation does not normally use prescribed burning to reduce wildfire incidence or intensity. All burning is done in accordance with IAAAP Fire Department protocols. Opportunities to prescribe burn are weather-dependent, and parameters for prescribed burning (wind speed, relative humidity, fuel moisture, and atmospheric conditions) must be followed closely. Prescribed burning is generally accomplished from early January through early April. However, based on location, current conditions, desired results, etc., burning may be performed outside these parameters. Prescribed burning that may affect potential Indiana and northern long-eared bat summer habitat is restricted to the period outside the summer maternity dates of April 15 - September 15. The Natural Resources Manager provides the Fire Department a map of areas to be burned each year.

Realistic long range scheduling of prescribed burning is not feasible as annual burning conditions greatly affect burning schedules. However, IAAAP's goal is to burn about 50 acres annually. A long range burning plan is difficult to develop as there are many unpredictable variables that affect burning, such as weather, Fire Department personnel strength, and competing tasks. Such a plan must be developed as a flexible, evolutionary document.

4.13.2 Proposed Management

Project: Fire Management

Justification: AR 350-4, AR 200-1, stewardship

Project Timing: Ongoing

Regulatory Coordination: None required

Change from Current Management: No significant change

Goal. Prevent and suppress wildfires; utilize prescribed burning to sustain or enhance mission capabilities and maintain ecosystem biodiversity and functionality.

Objective 1. Provide natural resources management-related recommendations relative to fire suppression activities and provide support as needed to the IAAAP Fire Department.

Objective 2. Update and refine the *Integrated Wildland Fire Management Plan* (Appendix 4.13.1.1) as necessary.

Objective 3. Use prescribed burning to maintain the military mission and enhance IAAAP ecosystems.

Objective 4. Provide the Fire Department a map of areas to be burned each year.

Objective 5. Maintain firebreaks and roads to provide for quick access for fire management and facilitate an effective prescribed burning program.

4.14 Outdoor Recreation

4.14.1 General

IAAAP is a large, relatively undeveloped, open space. This open space and outdoor recreation opportunities associated with it are perhaps IAAAP's best natural attributes in terms of community quality of life.

Outdoor recreation enhances the quality of life for military and civilian personnel. As such, Army lands with suitable natural resources are to be managed to allow outdoor recreational opportunities, consistent with the Sikes Act. For the purposes of this INRMP and to be consistent with AR 200-1 (Department of the Army 2007), outdoor recreation is defined as recreational programs, activities, or opportunities that depend on the natural environment. Developed or constructed facilities and activities, such as golf courses, tennis courts, baseball facilities, etc., are not included.

People and social uses/needs are an integral part of ecosystem management. The outdoor recreation program is based on providing quality experiences while sustaining ecosystem integrity. Activities that have a direct effect on species populations, such as game harvest, will be monitored for impacts. Special consideration will be given to protecting critical areas (e.g., cultural resources sites, special interest areas) from negative impacts due to outdoor recreation. Outdoor recreation on IAAAP is limited to hunting, fishing, and trapping. Mushroom, nut, and berry hunting activities are allowed for all authorized persons with exception of the general public.

Military Mission Considerations

The military mission has priority over outdoor recreation involving access to the Plant. If outdoor recreational activities are to continue to thrive on IAAAP, this military mission priority must not be compromised. IAAAP, consistent with its Army leadership role, has shown that producing and storing ammunition while providing quality recreational opportunities for military personnel, their families, civilian employees, and the general public can be achieved simultaneously.

It is the policy of the Commander to restrict certain activities and access to IAAAP in the interest of national defense and to restrict other activities as safety, security, and common sense dictate. The exercise of care, judgment, and cooperation with authorities is expected of all persons who enter the installation to hunt, fish, and trap.

Public Access

Public access is a tradition on IAAAP. There are several opportunities for the general public to participate in Plant activities. In maintaining a policy of public access to the greatest extent possible, the Plant relies on a responsible public to adhere to restrictions placed on range access.

IAAAP's policies toward public access are within both the spirit and letter of Army and DoD policies. Access to the installation for recreational activities is controlled by each type of activity (e.g., fishing, hunting). About 15% of game hunters are IAAAP employees. Personnel authorized to hunt, fish, or trap in restricted areas of the installation are categorized to limit access to areas within the installation. Seasonal

licenses, which must be renewed annually, may be issued to personnel in several categories in accordance with IAAAP Regulation 420-1. Quotas are based on safety and quality of the experience (*e.g.*, prevention of overcrowding), as well as the status of game populations with regard to their capability to sustain harvest. Lottery drawings are conducted by IAAAP to fill hunt quotas.

Individuals who desire to hunt, fish, or trap must obtain IAAAP permits and the required State and/or federal license, permit, or stamp for the activity they wish to pursue. Hunters, anglers, and trappers must attend the mandatory safety briefing annually.

4.14.2 Hunting, Fishing, and Trapping

Military installations usually have complex hunter and angler control systems. These are needed to accommodate recreational activities without interference with the military mission and to ensure safe, high quality recreational experiences.

AR 200-1 (4-3d(9)(b) and (d)-(g)) (Department of the Army 2007) requires the following with regard to hunting and fishing.

- Coordinate with morale, welfare, and recreation for the management and collection of fees for hunting and fishing. Do not expend environmental appropriated funds for non-appropriated fund administration of hunting and fishing activities.
- Provide for controlled recreational access where feasible at Army installations containing land and water areas suitable for recreational use.
- Provide access to uniformed personnel, family members, and the public for hunting and fishing, consistent with security requirements and safety concerns.
- Provide access to disabled veterans, military dependents with disabilities, and other persons with disabilities when public access is available and when topographic, vegetative, and water resources allow access for such persons without substantial modification to the natural environment.
- Include hunting and fishing plans within the INRMP.

Where not otherwise specified, natural resources regulations of Iowa are adopted by IAAAP. Hunters, anglers, and trappers must abide by federal, state, and local regulations. Species authorized for harvest are the same as those authorized by the state unless restricted by the Commander.

4.14.2.1 Current Management

Records of permit sales, trips afield, and harvest are maintained by the Natural Resources Manager. Access to the installation for hunting, fishing, and trapping is strictly regulated, and all prospective recreational users must apply for permits using the IAAAP Recreational Use Application.

Interest in hunting and fishing has increased on IAAAP over the last several years. IAAAP annually has about 250 deer hunters, about 3 trappers, and about 100 anglers.

Hunting, Fishing, and Trapping Regulations

The IDNR issues regulations for hunters, trappers, and anglers in Iowa, including those who use IAAAP. IAAAP Regulation 420-1, *Hunting and Fishing Regulation* is the primary means of establishing controls on hunting, fishing, and trapping on IAAAP.

IAAAP fishing seasons are identical to those used outside of the Plant. Regulations specific to fishing on IAAAP include, but are not limited to, the following:

- general public anglers are permitted to fish Mathes Lake #18, Stump Lake #19, and Line 1 Pond #40;
- fishing is not authorized on days scheduled for shotgun deer hunting;
- the use of trot and limb lines is prohibited;
- unauthorized persons will not stock installation waters;
- anglers must check the Recreational Activities Control Board prior to entering the installation;
- anglers must abide by established entry and exit hours;
- cleaning of fish on the installation is prohibited;
- anglers must attend the IAAAP safety briefing; and
- anglers must abide by IAAAP bag and length limits and other special regulations, such as catch and release of all flathead catfish.

IAAAP hunting seasons mirror those used outside the Plant, but bag limits are different than those used outside the Plant. Bag limits, method of take, and number of permitted hunters are determined annually prior to the start of the season. Species hunted on IAAAP are deer, turkey, and small game, such as quail, squirrel, and rabbit. Authority to hunt is tightly controlled, and permits are obtained through issue of permits on a first-received, first-served system or a lottery drawing (only mailed applications are accepted).

Regulations specific to small game hunting on IAAAP include, but are not limited to, the following:

- dogs may be used to hunt dove, quail, pheasant, rabbit, and waterfowl only;
- only shotguns using shot are approved for small game and varmint hunting;
- hunters must observe a 100-yard minimum distance from above-ground magazines, outdoor ammunition storage locations, workshops, and other above-ground ammunition facilities; and
- waterfowl hunters must remove all decoys and blinds daily.

IAAAP has specific regulations for turkey hunting, such as the youth season is per state regulation with some exceptions including, but not limited to, the following:

- youth must be 12-15 years old and must have a hunter safety card,
- youth will be escorted by an adult with an IAAAP recreational permit that has spring turkey privilege listed on it,
- to escort a youth requires the adult to be within arms reach of the youth when the youth is handling a weapon and within 30 feet of the youth if the youth is not handling a weapon, and
- youth are not allowed to hunt, scout, or assist during the regular adult seasons.

IAAAP deer regulations vary from the State regulations significantly. A few of the more obvious differences are listed below.

- The number of antlerless deer tags that a resident is required to obtain is announced at the annual hunter safety briefing.
- Deer hunters must harvest the required antlerless deer prior to harvesting an antlered deer (youth and disabled hunters are the exception).
- Deer hunters must have harvested an antlerless deer in the same season in which they harvest an antlered deer.
- Each year the number of antlered deer allowed to be harvested per hunter per year is announced at the annual hunter safety briefing.

- Because installation deer hunting is designed for Iowa residents as the installation is a special hunt area under IDNR regulations, nonresident hunters may use a regular state deer tag obtained through the IDNR drawing.

Wheelchair accessible hunting blinds were built in Recreational Zones 1A, 1C, and 2A. An additional three or four handicapped, but not wheelchair accessible, were purchased and installed in 2016. Use of these blinds is for disabled persons only, and such use is on a first come first served basis. The first deer harvested from the Zone 2A blind occurred during fall 2011. Additional elevated blinds were installed in 2017.

Regulations specific to trapping on IAAAP include, but are not limited to, the following:

- trappers must turn in a daily harvest report to Security Officers;
- only pellet guns are allowed for retrieving game from traps;
- blaze orange must be worn while operating trap lines; and
- leg-hold traps will not be attached to any fence.

Mushroom, nut, and berry harvesting is allowed on IAAAP for all authorized persons with exception of the general public. An IAAAP recreation permit is not required.

IAAAP Permits

Individuals must obtain appropriate Plant permits to participate in hunting, trapping, and fishing on IAAAP. Permits cost the same for both IAAAP personnel and the general public. 2018 permit fees were \$30 each for small game (includes fall turkey), fishing, trapping, deer (single or multiple), and spring turkey. There is no application fee. IAAAP permit fees are used solely for the protection, conservation, and management of fish and wildlife on the Plant.

IAAAP requires each person who applies for recreational access to read and sign a disclaimer statement. This agreement reduces government and the operating contractor's liability associated with recreation on the Plant and serves as a reminder to participants that there are inherent dangers to recreating on IAAAP.

State Licenses

Persons are responsible for obtaining Iowa hunting or fishing licenses and/or applicable game tags or stamps before obtaining IAAAP permits. These licenses are not available at IAAAP.

Check-in and Check-out Procedures

All recreational users are required to check the Recreational Activities Control Board before entering IAAAP. All participants must process in and out through Gate #4. All individuals entering and exiting are subject to inspection of their person, property, and vehicles as a condition of entry. Recreational users must show their IAAAP Recreational Permit and indicate the zone or body of water they will be using. When exiting, each individual must report all fish and game harvested.

IAAAP Regulation 420-1 outlines specific requirements for hunters, trappers, and anglers for check-in and check-out procedures. The above briefly-described process works well on IAAAP, and there are no plans to change the system.

Hunting and Fishing Maps

IAAAP maps are essential for hunter and angler use of the Plant. A recreational use map is in IAAAP Regulation 420-1 and shown on Figure 3.4.2 of this plan.

Safety Considerations

IAAAP Regulation 420-1 contains references to recreational use safety practices and requirements. All recreational users on IAAAP are required to attend a safety briefing. Certain activities also have minimum requirements for wearing blaze orange clothing and carrying a cell phone and whistle.

All persons eligible for recreational access on IAAAP are subject to a background check, and all personnel and vehicles are subject to search by Security personnel. Items prohibited on IAAAP include matches, illegal drugs, alcoholic beverages, fireworks, flares, trail cameras, GPS units, and any weapon or ammunition other than what is authorized for the particular hunt being conducted.

The possibility exists for encountering potentially hazardous items or unexploded ordnance on IAAAP. There are five sites in the Military Munitions Response Program that have potential explosive hazards. These sites are at Line 6, Central Test Area in Line 5, West Burn Pads Area in Zone EDA, Incendiary Disposal Area in Zone 6C, and Possible Demolition Site in Zone 5C. Unexploded ordnance is a major portion of safety briefings. Hunters and anglers are warned to never pick up, move, or otherwise disturb any suspect or unusual items on IAAAP.

4.14.2.2 Proposed Management

Project: Hunting, Trapping, and Fishing Programs

Justification: Stewardship; compliance with Sikes Act (public use and wildlife management)

Project Timing: Ongoing

Regulatory Coordination: None required except for IDNR regulatory support for hunting, trapping, and fishing

Change from Current Management: No significant change

Goal. Provide opportunities to the IAAAP community and general public for quality, safe, and equitable hunting, trapping, and fishing, consistent with needs of the IAAAP military mission.

Objective 1. Follow IDNR season, bag limit, and other regulatory instruments for hunting, trapping, and fishing, with exceptions for management or safety purposes.

Objective 2. Continue recreation control systems to ensure safe conditions and equitable treatment of users.

Objective 3. Update recreation rules and regulations as needed.

Objective 4. Continue to provide hunting, trapping, and fishing permits on the Plant.

Objective 5. Periodically evaluate the IAAAP recreational user fee schedule.

Objective 6. Ensure IAAAP recreational users follow state and Plant safety requirements.

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5.0 Natural Resources-related Programs

This chapter includes those programs that are directly related to natural resources management but are not being implemented solely for that purpose. Some, such as enforcement and NEPA implementation, are totally or partially within responsibilities of organizations other than the Natural Resources Office.

Programs are described in terms of their status and recent history (**Current Management**) followed by proposed project(s) (**Proposed Management**), if appropriate. These projects may be Operations Support Division submissions or submissions through another organization's budget process on IAAAP to integrate implementation of this INRMP to the budget process.

Projects are described in a goal(s)-objective(s) format to provide concise process descriptions that are compatible with adaptive management analyses and overall INRMP implementation monitoring processes. All goals and objectives are summarized in tabular format in Appendix 7.4, *List of INRMP Goals and Objectives*.

Each project has a summary description at the beginning of the Proposed Management section. The format is as follows:

Project: Title

Justification: Participation in regional initiatives, Sikes Act, ESA, AR 200-1, stewardship, etc.

Project Timing: Dates to be accomplished, by objective (*e.g.*, 2013, 2013-14, ongoing)

Regulatory Coordination: Agencies with whom coordination is required

Change from Current Management: Level of significance (if any) from Current Management

5.1 Natural Resources Enforcement

Many aspects of natural resources management require effective environmental law enforcement (*e.g.*, protection of rare or unique species, harvest controls, protection of sensitive areas, water pollution prevention, hunting and fishing recreation).

The Sikes Act (16 USC 670(a)) requires that each INRMP shall, where appropriate and applicable, provide for enforcement of natural resource laws and regulations. The Sikes Act also states that with regard to the issuance of special state hunting and fishing permits, in accordance with the INRMP, the Commanding Officer of the installation or persons designated by that Officer are authorized to enforce such special hunting and fishing permits, acting as agent or agents of the state if the cooperative plan (this INRMP) so provides. The Sikes Act states that priority shall be given to the entering into of contracts for the procurement of enforcement services with federal and state agencies having responsibility for the conservation or management of fish or wildlife.

The Sikes Act (Section 670e-1, Section 106) gives the Commanding Officer of an installation, acting as an agent of the Secretary of Defense, the authority to enforce all federal laws relating to the management of natural resources on federal land with respect to violations of the laws that occur on military installations within the United States.

With regard to implementation of this INRMP, the Sikes Act (Section 670e-2, Section 107) states, "*To the extent practicable using available resources, the Secretary of each military department shall ensure that sufficient numbers of professionally trained natural resources management personnel and natural resources law enforcement personnel are available and assigned responsibility to perform tasks necessary*

to carry out this subchapter, including the preparation and implementation of integrated natural resources management plans.”

5.1.1 Current Management

History, Authority, and Operations

American Ordnance LLC Security Officers have historically performed natural resources law enforcement on IAAAP. Security Officers monitor access to the Plant for recreational purposes.

Jurisdiction

IAAAP has concurrent jurisdiction where state or federal commissioned officers can enforce laws. A cooperative relationship exists between IAAAP and IDNR. IDNR Conservation Officers are available to assist Plant Security Officers if requested.

Federal citations are written for most violations. The Federal Magistrate in Rock Island, Illinois adjudicates these citations. Additionally, the Commander of IAAAP has the authority to revoke IAAAP permits as a result of violations of IAAAP regulations or state or federal laws. The Head of Army Security, in consultation with the Natural Resources Manager, makes recommendations on revocations to the Commander. These recommendations are based on the seriousness of Army violations, the incident report, and case history.

Enforcement Emphasis

Security regarding hunters and anglers begins at the gate. Hunters are allowed to check in at certain times and must clear the gate by specified times. Information recorded includes recreational badge number, permit number, license number, hunting zone, cell phone number, number and type of weapon, and name. Recreational users are issued vehicle placards to be displayed on the dashboard as a condition of entry. Placards are only to be displayed while on IAAAP.

Patrol activities are specific to hunters only during shotgun deer season. Patrol during other hunting or fishing seasons is generally incidental to other Security activities. Security Officers investigate suspicious activity, but they do not function as game wardens.

Training

The Sikes Act authorizes DoD to enforce all federal environmental laws, including National Historic Preservation Act (NHPA), Archeological Resources Protection Act, MBTA, Lacey Act, CWA, and ESA when violations occur on the installation. Game law enforcement is a fairly minor part of Security activities on IAAAP. American Ordnance LLC Security Officers do not receive specific natural resources enforcement training.

Hunters are used to dealing with game wardens, and tactics employed by Security Officers sometimes lead to complaints. This is generally a mutual lack of understanding. Security Officers are taught to deal more aggressively with armed persons, and hunters fall into this category. The Natural Resources Manager works with Security Officers to lessen contact tensions. In addition, all Security Officers who are scheduled for working hunter assignments should attend the installation safety briefing for hunters to become aware of responsibilities placed upon hunters.

5.1.2 Proposed Management

A specific project for law enforcement is not required since it is performed as part of American Ordnance LLC Security duties. However, the following goal and objectives are pertinent to natural resources management on IAAAP.

Goal. Assure legal compliance of military and civilian activities with regard to natural resources on IAAAP.

Objective 1. Maintain a law enforcement program for military and civilian activities that relates to natural resources protection on IAAAP.

Objective 2. Coordinate enforcement activities with other agencies, particularly IDNR and USFWS as necessary.

Objective 3. Work with Security Officers to lessen hunter contact tensions, and ensure Security personnel understand recreational user responsibilities on IAAAP.

5.2 Conservation Awareness

Conservation awareness is instrumental in creating conditions needed to manage natural resources. IAAAP's approach to awareness stresses education. It provides government and contractor personnel and the public with insights into the Plant's natural environment and conservation challenges. The more people know about the Plant's unique natural resources, the more responsibly they act toward them.

Education also promotes awareness of critical environmental projects and the rationale behind them. Activities, such as erosion control, wildfire suppression, etc., can be accomplished with little conservation awareness effort since Plant personnel, recreationists, and the general public naturally supports these easily understood efforts. However, issues such as protection of sensitive areas for little understood plant and wildlife species, restrictions on military operations, prescribed burning, permit fees and their uses, etc., require effective communication to get positive support and, perhaps more importantly, to avoid adverse reactions from various users.

5.2.1 Current Management

Use of Media

The American Ordnance LLC email kiosk system is one avenue used by the Natural Resources Manager to access the installation community. Natural resources-related items, such as hunting and fishing and mushroom harvest season dates are posted on this system. The installation web page and facebook page are also used to keep the IAAAP community informed.

The Burlington newspaper, *The Hawkeye* has occasional interest in IAAAP events related to natural resources. This paper provided considerable coverage of the Trumpeter Swan transplant onto IAAAP, and it is used for paid announcements of agricultural lease information.

Special Events

Special events are limited on IAAAP due to safety and security considerations. Earth Day was celebrated on IAAAP for the first time in 1995. About 80 people participated in that event, and 30 volunteers assisted. In 1996, IAAAP conducted its second annual Winner's Circle Science Fair in Burlington and held its semi-annual road clean up day of public highways running north of the installation to commemorate Earth Day. IAAAP developed a slide show and video of its environmental program, which was used as part of a program given to area groups, such as school classes, health centers, and civic clubs. Special events and program presentations have been curtailed substantially due to personnel and funding limitations.

Youth Groups

IAAAP is committed to cultivating a conservation ethic in local youth. Boy Scouts, in particular, need support with projects, merit badges, and conservation talks. Scouts have assisted the natural resources program on numerous projects (*e.g.*, tree trimming, flora identification, nest boxes, fish habitat, augmentation of rose rosetta disease (grafting to kill multiflora rose)) in the past. Personnel limitations have curtailed the ability of IAAAP to support these projects.

5.2.2 Proposed Management

A specific project for conservation awareness is not required since it does not require funding beyond personnel salaries. However, the following goal and objectives are pertinent to natural resources management on IAAAP.

Goal. Provide information to IAAAP and external interested communities regarding natural resources and associated management programs at IAAAP.

Objective 1. Improve the general knowledge of all persons associated with the natural resources program, particularly those who come into regular contact with interested persons.

Objective 2. Use the installation web page, facebook page, and the American Ordnance LLC email kiosk system to keep the IAAAP community informed.

Objective 3. Encourage youth to participate in the natural resources program, whenever possible.

5.3 Cultural Resources Protection

Cultural resources management at IAAAP is provided in accordance with Section 106 and Section 110 of the NHPA (16 USC Section 470, as amended), the Archeological Resources Protection Act (16 USC Section 470aa-47011), the American Indian Religious Freedom Act (42 USC), the Native American Graves Protection and Repatriation Act (25 USC Section 3001 *et seq.*), Executive Order 11593 (*Protection and Enhancement of Cultural Environment*), DoD Directive 4710.1 (*Archeological and Historic Resources Management*, 1984), and AR 200-1, *Environmental Protection and Enhancement* (Department of the Army 2007).

5.3.1 Current Management

5.3.1.1 General

IAAAP's Natural Resources Manager has overall responsibility for historic and prehistoric cultural resources management, including coordination with the Iowa State Historic Preservation Officer, the Advisory Council on Historic Preservation, Native American tribal organizations, and the public, as appropriate. IAAAP has a Cultural Resources Management Plan (Earth Tech, Inc. 2002).

5.3.1.2 Cultural Resources Inventory

Section 3.4.1, *Cultural Resources* describes the status of cultural resources on IAAAP.

5.3.1.3 American Indian Tribe Consultation and Coordination

Various laws and regulations require IAAAP to consult with American Indian tribes regarding Army activities on sites within the installation.

The *National Historic Preservation Act* requires that federal agencies consult with the Advisory Council on Historic Preservation regarding any proposed action that has the potential to affect a property on or

eligible for the National Register. This includes consultation and coordination with the State Historic Preservation Officer and interested parties, including but not limited to Native Americans.

The ***Archaeological Resources Protection Act*** requires that archaeological resources on public and Indian lands be protected. This includes notifying American Indian tribes, in advance, of possible harm to sites with religious or cultural importance.

The ***Native American Graves Protection and Repatriation Act*** protects the ownership and control of Native American human remains and related cultural items excavated or discovered on federal lands. If human remains are discovered during projects, work must stop, and a reasonable effort must be made to protect the discovery. Appropriate Native American groups must be notified, and requirements of Section 106 of National Historic Preservation Act and the Native American Graves Protection and Repatriation Act must be followed for excavation and disposition of the remains. The Native American Graves Protection and Repatriation Act also requires a 30-day delay period after the discovery of human remains before project work in the area of the discovery can resume. Work may resume earlier if consultation and agreement occur.

The ***American Indian Religious Freedom Act*** covers the protection of intangible, ceremonial, or traditional values and concerns not tied to specific cultural properties. IAAAP must establish contact with interested Native American groups during the regular course of the National Historic Preservation Act Section 106 process.

Executive Order 13007 (Indian Sacred Sites) stipulates that if a federally-recognized American Indian tribe or representative of an Indian religion identifies a sacred site on IAAAP, the installation commander must enter into consultation with that group or individual to provide access to and ceremonial use of the site and avoid adversely affecting the physical integrity of such sites. No such sites have been identified on IAAAP.

Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments) states Native Americans shall have access to DoD sites and resources that are of religious importance or are important to the continuance of their cultures (*e.g.*, areas containing traditionally used plants and traditionally used hunting areas), consistent with the military mission, appropriate laws (42 USC 1996, reference (d)) and regulations, and subject to the same safety, security, and resource considerations as the general public.

Department of Defense American Indian and Alaska Native Policy (Department of Defense 1998) emphasizes that the relationship between military services and American Indian tribes is to be on a *government-to-government* basis. Consultation and coordination with federally-recognized American Indian tribes is to be initiated with the heads of the tribal governments. Department of the Army guidance places the responsibility for initiating tribal consultation at the installation commander level.

5.3.1.4 Natural Resources Management Implications

Natural resources management on IAAAP has little potential to affect historic architectural properties. However, natural resources management has potential to affect archeological sites on IAAAP, as outlined below.

- **Cultivation:** Agricultural activities (*e.g.*, cropland soil tillage) can adversely impact cultural resources through mechanical soil disturbance. Such activities can also lead to erosion of cultural deposits.
- **Forestry operations:** Forest management, tree planting and cutting, can cause moderate ground disturbance and result in damage to archeological sites.
- **Grazing:** Improper grazing practices can change the landscape, particularly vegetation, and lead to

erosion. It can also directly affect sites such as old homesites.

- **Erosion control:** Projects involving excavation, earth moving, and fill deposition can damage or bury archeological sites. Generally, however, effects to archeological sites from reduced erosion are positive.
- **Prescribed burning:** Prescribed fire has some potential to affect archeological sites by denuding areas of vegetation and promoting erosion. Fire has a greater potential to adversely impact historic archeological sites with significant surface features.
- **Outdoor recreation programs:** Public access associated with recreational activities has limited potential to increase the risk of vandalism to archeological sites.

Even with proper review, natural resources projects still have potential to affect archeological sites through accidental discovery. IAAAP will avoid adverse effects to cultural resources from natural resources management through proper review and planning. Proposed projects will be submitted, as part of standard NEPA review, for approval, determinations of effect, and Section 106 consultation, as necessary.

Numerous provisions of this INRMP benefit cultural resources management on IAAAP. These include, *Soils Management* (Section 4.3), *Wetlands Management* (Section 4.6.1.2), *Special Interest Area Protection* (Section 4.9), *Natural Resources Enforcement* (Section 5.1), and *NEPA Implementation* (Section 5.4).

5.3.2 Proposed Management

Project: Cultural Resources Protection

Justification: Compliance with various cultural resources laws and regulations, stewardship

Project Timing: Ongoing

Regulatory Coordination: State Historic Preservation Officer, in some cases

Change from Current Management: No significant change

Goal 1. Implement this INRMP in a manner consistent with the protection of cultural resources at IAAAP.

Goal 2. Comply with all laws, regulations, and Army guidance regarding cultural resources on IAAAP.

Objective 1. Update the Cultural Resources Management Plan (last update-2015).

Objective 2. Implement provisions of the Cultural Resources Management Plan that relate to natural resources management.

Objective 3. Consider natural resources projects when planning cultural resources surveys and use results of cultural resources surveys to plan natural resources projects.

Objective 4. Avoid or mitigate adverse effects to cultural resources from natural resources through proper review and planning; submit proposed projects, as part of NEPA review, for approval, determinations of effect, and Section 106 consultation, as necessary.

Objective 5. Take the following protective measures upon discovery of sites.

- Cease ground disturbing activities immediately and report the discovery of potential cultural deposits.
- Consider alternatives for moving the project to another location.
- If remains are determined to be of no cultural significance, do no further investigation and resume

the project.

- If remains are determined to be of cultural significance, protect the site until such time that it is determined ineligible for the NRHP.

Objective 6. Use natural resources techniques and projects to protect cultural resources sites.

Objective 7. Install physical barriers (fencing and signage) for sensitive areas, such as known cultural resource sites but also for unexploded ordnance areas, as necessary.

5.4 National Environmental Policy Act Implementation

The National Environmental Policy Act was created to disclose environmental concerns with human activities and resolve them to the best degree possible. The intent of the NEPA is to protect, restore, or enhance the environment through well-informed federal decisions. AR 200-2 (32 CFR Part 651) provides Army policy on NEPA (42 USC 4321–4347) requirements. AR 200-2 provides policies, procedures, and responsibilities for integrating environmental considerations into Army planning and decision-making. It outlines NEPA compliance requirements of proposed Army actions.

NEPA regulations (32 CFR Part 651, *Environmental Analysis of Army Actions*) require mitigation or full disclosure of damage to the environment. The NEPA was not legislated to stop actions. Rather, it was crafted to identify environmental problems, providing an opportunity to resolve them using planning at early stages of project development.

5.4.1 General Responsibility

The Natural Resources Manager has responsibility for NEPA implementation and compliance related to natural resources on IAAAP. The process of reviewing and preparing NEPA documentation involves direct coordination with the Natural Resources Manager. Coordination may also include other natural resources partners, particularly those listed in Chapter 2 of this INRMP.

NEPA Documentation

The most common NEPA document prepared for projects with minor to no impact on natural resources is a CX. This simple documentation works well for routine projects where natural sites are not negatively impacted. The CX is the documentation required for this INRMP since the previous EA was incorporated in the 2013-2018 INRMP with no significant changes.

EAs are required when conditions for a categorical exclusion are not met. This can happen when a large construction project is planned, when the action involves a wide geographic area, or when wetlands or other sensitive plant communities may be involved. Examples include major erosion control projects, use of pesticides, or major range construction. EAs require the Commander's approval, publishing a Finding of No Significant Impact (FONSI), and waiting 30 days for public comment.

If a FONSI is not appropriate, the following options are available:

- modify the action to remove significant impacts;
- mitigate significant adverse impacts;
- drop the action; or
- publish a Notice of Intent to prepare an Environmental Impact Statement.

The previous natural resources management plan (IAAAP 2013) included an EA. That EA has been updated and analyzed within this document. However, the CX within this INRMP extends the previous EA since no significant changes are anticipated over the next five years. As defined in 32 CFR Part 651, Appendix B -CX(b)(3), a REC is not required for this CX.

Mitigation

Mitigation is an excellent way to either consider less damaging options or provide means to off-set damage to the environment and should be considered throughout the NEPA process. Below are five general mitigation tactics:

Avoidance: Avoid adverse impacts on natural resources by not performing activities that would result in such impact. Confine construction to areas where no significant impact would occur to natural resources.

Limitation of action: Reduce the extent of an impact by limiting the degree or magnitude of the action. Minimize impacts of construction projects by arranging timing, location, and magnitude of actions so that they have the least impact on natural resources.

Restoration of the environment: Restore the environment to its previous condition or better. This could involve reseeded and/or replanting an area with native plants after it has been damaged by construction projects.

Preservation and maintenance operations: Design the action to reduce adverse environmental effects. This could involve actions such as monitoring and controlling pollution, contamination, disturbance, or erosion caused by construction projects that would impact natural resources.

Replacement: Replace the resource or environment that will be impacted by construction projects. Replacement can occur in-kind or otherwise, on-site, or at another location. This could involve creation of the same type or better quality habitat for a particular impacted fish or wildlife species or creation of habitat for another species.

Mitigation that is identified in a FONSI is a Class 1 “must fund” for environmental purposes. This provides a reliable mechanism to fund mitigation included in NEPA documents.

5.4.2 NEPA and Natural Resources Management

5.4.2.1 Current Management

The Operations Support Division uses the NEPA to ensure natural resources activities (as described in this INRMP) are properly planned, coordinated, and documented. The Natural Resources program also uses the NEPA to identify problems associated with other organization’s projects which affect IAAAP’s natural resources when afforded the opportunity to review such projects.

Operations Support Division personnel can be very helpful in assisting with the decision as to where and/or when the proposed action will take place. Siting non-cantonment area-related projects is perhaps the most basic decision that requires input from natural resources personnel. If this phase is done within the cooperative spirit of the NEPA, most other environmental problems are generally resolved with relative ease. Decisions such as specific siting or mission planning should be cooperatively discussed prior to preparing NEPA draft documents. IAAAP Land Use Control Procedures will directly support this process.

An important offshoot of proper NEPA implementation is that projects are often enhanced by the effort. Siting is one of the most common examples of project enhancement. When natural resources managers

understand mission/project requirements in terms of land features and requirements, they often not only offer more potential site options to mission or project planners, but also offer alternatives to avoid future environmental conflicts.

5.4.2.2 Proposed Management

Project: Use of NEPA

Justification: Compliance with the NEPA and other federal laws affected by individual projects, stewardship

Project Timing: Objective 1 - 2022; other objectives - ongoing

Regulatory Coordination: None

Change from Current Management: No significant change

Goal 1. Use NEPA to identify projects and activities on IAAAP that might impact natural resources and work with project planners to resolve issues early in the planning process.

Goal 2. Use NEPA to ensure this INRMP is documented according to the spirit and letter of the NEPA.

Goal 3. Help IAAAP comply with the NEPA.

Objective 1. Reference this INRMP/Categorical Exclusion in descriptions of affected environment to reduce verbiage in other NEPA documents.

Objective 2. Classify mitigation as a “must fund” for budgetary purposes.

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6.0 UNRESOLVED ISSUES

It is not unusual for some natural resources-related issues to be at a stage where the path to issue resolution is unknown or uncertain. Reasons for this status might be the political environment, a lack of scientific information, conflicting agendas, costs, or other roadblocks. Issue resolution difficulties will not prevent IAAAP from continuing to work on resolutions. Recognition and a willingness to deal with such issues are a part of the process itself.

Ecosystem Restoration

Restoring pre-settlement (pre-European) forest and prairie ecosystems on IAAAP is somewhat inconsistent with other objectives of the military mission and natural resources management. Commercial products of the forest (*i.e.*, timber) and prairie (*i.e.*, crops and livestock) are important. The military mission requires protection from wildfires, yet fire is critical to both forest and prairie restoration and maintenance. There is also the virtual impossibility of restoration of any single parcel to conditions prevalent at any point in time prior to arrival of European descendants. Effects of surrounding modern landscapes (*e.g.*, exotic species, human activities, off-site watershed conditions) will detract from original conditions even if plant communities are similar.

Ecosystem management recognizes the importance of providing human-use products as well as restoring and maintaining native ecosystems. IAAAP will continue to work toward a reasonable balance in this area.

Public Access for Recreational Use

IAAAP has an equitable public access policy. However, this is perhaps the most potentially volatile issue regarding natural resources management on the installation. IAAAP uses a lottery system to fill the recreational permit quotas. This policy requires that newcomers learn about the layout of recreational zones, recreational regulations, and the fairly complex access procedures required to meet security requirements.

Newcomers must develop a conservation ethic toward IAAAP's natural resources. This has not been a serious problem in the past as the loss of hunting privileges (potentially lifelong privileges) is considered a monumental punishment. Newcomers are usually a small portion of the recreational users and most newcomers are drawn to the program by a friend or family member that is, or has participated in the program.

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7.0 IMPLEMENTATION

This INRMP is only as good as IAAAP's capability to implement it. This INRMP was prepared with a goal of 100% implementation. Below are described the organization, personnel, and funding needed to implement programs described in chapters 4-5.

AR 200-1 (4-3d(1)(b)) (Department of the Army 2007) requires INRMP implementation by completing the following:

- actively requesting, receiving, and using funds for priority projects and activities;
- ensuring that sufficient numbers of professionally trained natural resources management personnel are available to perform the tasks required by the INRMP;
- coordinating annually with all cooperating offices; and
- documenting specific INRMP action accomplishments undertaken each year.

7.1 Organization

The Natural Resources Manager can implement most of this INRMP and fulfill goals and policies established in Chapter 1 and more specific goals and objectives within chapters 4-5. Other responsible organizations identified in Chapter 2 are also capable of implementing their portions of this INRMP with no organizational changes, although they may elect to make changes during 2018-2023 for improved operations efficiency.

7.2 Personnel

7.2.1 INRMP Implementation Staffing and Training

7.2.1.1 Current Management

Staffing required to implement this INRMP at IAAAP is the Natural Resources Manager (full-time federal employee). This does not include personnel within other IAAAP organizations who have roles in implementation of this INRMP.

IAAAP has a goal to continuously improve the success of natural resources management activities through professional development and information exchange. This will be accomplished by:

- maintaining staff knowledge of management strategies at the current state of the art through training and participation in workshops, research presentations, and other activities of regional and national professional natural resources research and conservation programs; and
- sharing information with natural resources experts to ensure maximum benefits of adaptive management and research efforts.

IAAAP plans to send one person to the following annual workshops or professional conferences if schedules and budgets allow:

- National Military Fish and Wildlife Association annual workshop (concurrent with the North American Wildlife and Natural Resources Conference),
- North American Wildlife and Natural Resources Conference,
- The Wildlife Society Conference,
- Midwest Fish and Wildlife Conference,

- Iowa Water Conference,
- Southeast Deer Study Group meeting, and
- The Pest Management Quality Assurance Evaluator course and refresher training.

These annual workshops and professional conferences have some of the best scientific publications in their professions, and literature review is a commitment needed to maintain standards. Meetings of these groups and societies provide excellent ways to communicate with fellow professionals as well as maintain professional standards. Other conferences/workshops will be evaluated for their usefulness, and decisions will be made based on appropriateness to ongoing projects and funding availability.

The Natural Resources Manager will be encouraged to join professional societies and their state chapters, as well as be active in them. Personnel will be sent to as many meetings as feasible to meet with other professionals, exchange ideas, and work on matters of common interest.

7.2.1.2 Proposed Management

Project: INRMP Implementation Staffing and Training

Justification: Compliance with Sikes Act (implementation of INRMP) and other federal laws affected by this INRMP, support of the military mission, stewardship

Project Timing: All objectives - ongoing indefinitely

Regulatory Coordination: None directly

Change from Current Management: No significant change

Goal 1. Provide staffing of natural resource management professionals required to effectively manage natural resources on IAAAP (Department of Army 2007).

Objective 1. Provide staffing for the IAAAP natural resources program to effectively implement this INRMP.

Goal 2. Provide training to natural resources personnel implementing this INRMP.

Objective 2. Encourage natural resources personnel to join professional societies and their state/regional chapters as well as be active in them.

Objective 3. Send at least one person to each of the annual workshops or professional conferences discussed above.

Objective 4. Evaluate other conferences/workshops for their usefulness as training tools, and send personnel to those most justified, based on current training needs and those most related to IAAAP activities.

Objective 5. Ensure that natural resources personnel obtain the one-time or occasional refresher training needed to fulfill job requirements (e.g., pest management, NEPA training, endangered species documentation/consultation training, wetland permitting, MBTA).

Objective 6. Actively participate in training sessions to disseminate knowledge learned at IAAAP.

7.2.2 External Assistance

7.2.2.1 Current Management

Demands of natural resources management have resulted in the need for outside assistance with natural resources programs on IAAAP. The installation has used its partnerships in a variety of ways, particularly

for plant and wildlife research and technical assistance in management. The growth of environmental compliance requirements has increased many of these needs and added considerably to the need for specialized external assistance in other areas, including on-the-ground personnel support.

Agency Assistance

IAAAP recognizes the importance of cooperating with federal and state agencies (sections 2.3 and 2.4). Other agency partners have included the NRCS, the U.S. Army Environmental Command, the USEPA, and the USACE. The USFWS has been a consistent source of fisheries management assistance. The IDNR has used IAAAP for many projects especially involving white-tailed deer and other game species. The NRCS has assisted with a variety of land management programs including agricultural leasing and wetlands delineation. The USACE provides contracting support for the installation. IAAAP is a partner with the Des Moines County Roadside Biologist for prairie restoration and weed control. IAAAP provides the site for the Southwest Iowa County Weed Commissioners Meeting every 3-5 years. During the next five years, IAAAP will use state and federal agencies, particularly this INRMP's signatory partners, the USFWS and the IDNR, as well as other partners, to assist with implementation of various aspects of this INRMP.

University Assistance

Universities are an excellent source of research assistance. IAAAP has primarily used Iowa State University to assist with specialized needs and the Iowa State University Extension Service for specialized expertise. This university and others will be considered as a source of assistance in implementation of this INRMP over the next five years.

Other Support

Contractors give IAAAP access to a wide variety of specialties and fields. A variety of projects could use the support of contractors in the next five years. Contractor and other sources of support will be evaluated on a case-by-case basis during the next five years.

7.2.2.2 Proposed Management

There is no requirement for a specific project for external assistance since objectives within this area are included within other projects of this INRMP. However, the below goal and objectives are appropriate to list.

Goal. Provide external specialized skills, personnel, and resources to support the IAAAP natural resources program.

Objective 1. Implement external support projects, which are described in more detail in appropriate sections of this INRMP.

Objective 2. Use county, state and federal agencies, particularly INRMP signatory partners, the USFWS and IDNR, to assist with implementation of this INRMP.

Objective 3. Use universities and contractors to assist with implementation of this INRMP.

7.3 Data Storage, Retrieval, and Analysis

The capability to store, retrieve, and analyze data is central to professional management of natural resources, and it is essential to implementing the adaptive management aspect of ecosystem management. IAAAP is committed to providing efficient, cost-effective systems for data storage and analysis.

7.3.1 Current Management

Microcomputer System

Microcomputers are essential to the routine operation of efficient natural resources management organizations. The volume of data is too substantial to handle without computers, and routine administrative tasks are accomplished most efficiently with computers.

The Natural Resources office is equipped with a quality personal computer and printer; it is used primarily to store data on flora and fauna. There are no major needs with regard to this system beyond normal upgrades and replacement of hardware and software.

Geographic Information System

A geographic information system (GIS) allows users to manipulate spatial data (e.g., maps, aerial photos, satellite images) in a similar fashion as a data management program allows the analyses and presentation of mathematical data. Data can be purchased and converted into most software formats, or it can either be scanned or digitized directly from maps or aerial photographs. A GIS can analyze different map layers (e.g., topography and vegetation) to show the relationship of one map layer to another.

The Natural Resources office would be well served by a GIS. Numerous data sources could be fully integrated and data layers developed on the natural resources of IAAAP. This would allow more efficient long-term monitoring of natural resources and facilitate adaptive management on the Plant. However, without additional staffing, use of a GIS for natural resources management at IAAAP is unlikely.

Remote Imagery

IAAAP has many aerial photographs taken by the U.S. Department of Agriculture. There are complete or partial black and white photographs, taken at various altitudes, for 1937, 1941, 1957, 1962, 1963, 1969, 1973, 1976, 1978, 1990, 1994, and 1995. In 1999, color infra-red aerial photographs were taken of IAAAP from an altitude of 2,000 feet. In 2003 and 2005, the NRCS took county-wide photographs, which are available at the NRCS website.

7.3.2 Proposed Management

Project: Data Storage, Retrieval, and Analysis

Justification: Sikes Act (implementation of INRMP) and other federal laws affected by this INRMP, support of the military mission, stewardship

Project Timing: All objectives - ongoing indefinitely

Regulatory Coordination: None

Change from Current Management: No significant change

Goal. Store, analyze, and use data in an efficient, cost-effective manner.

Objective 1. Upgrade microcomputer hardware and software as needed during the next five years.

Objective 2. Develop or obtain databases needed to support the IAAAP natural resources program.

Objective 3. Use remote imagery for improved decision-making for military activities, environmental management, and natural resources management and protection.

7.4 Project/Program Summary

Projects, goals, and objectives within this INRMP can be used to monitor the effectiveness of natural resources management at IAAAP. Appendix 7.4 contains a list of projects, goals, and objectives for this INRMP in the order they appear. Goals and objectives are abbreviated from chapters 4, 5, and 7.

7.5 Implementation Funding Options

Natural resources management relies on a variety of funding mechanisms, some of which are self-generating and all of which have different application rules. Below are general discussions about different sources of funding to implement this INRMP. As noted, not all of these funding options are now used by IAAAP.

7.5.1 Forestry Funds

Forestry funds are generated from sale of forest products and regulated via AR 200-1 (Department of the Army 2007). Individual installations can be reimbursed for approved forest management expenses. Forty percent of excess revenue produced by an installation is provided to the State. The remainder is deposited into the DoD Forest Reserve Account, which funds approved natural resources projects. Such projects include timber management, reforestation, timber stand improvement, inventories, fire protection, construction and maintenance of timber area access roads, purchase of forestry equipment, disease and insect control, planning (including regulatory compliance), marking, inspections, sales preparations, personnel training, and sales.

IAAAP does not currently generate forestry funds. The last timber removed from IAAAP was from the south boundary fence project in 2005, which was sold with the project.

7.5.2 Sikes Act Funds

Sikes Act funds are collected via sales of licenses to hunt or fish. They are authorized by the Sikes Act and regulated via AR 200-1 (Department of the Army 2007). These funds may be used only for the protection, conservation, and management of fish and wildlife on the installation where they are collected. They have no year-end obligation (unobligated funds carry over on 1 October).

Army policy encourages self-sufficiency with regard to managing game populations on military lands. IAAAP will, from time to time, examine options to increase Sikes Act income to maintain its quality hunting and fishing program. IAAAP anticipates collecting about \$17,000 - \$20,000 of Sikes Act funds annually during 2018-2023.

7.5.3 Agricultural Funds

Agricultural funds are derived from agricultural leases on installations and regulated via AR 200-1 (Department of the Army 2007). They are centrally controlled at Department of Army and Major Command levels with no requirements for spending where they were generated. They are primarily intended to offset costs of maintaining agricultural leases, but they are also available for preparing and implementing INRMPs. These are the broadest use funds available exclusively to natural resources managers.

The agricultural lease program averages about \$1,400,000 income annually. However, that amount includes what is collected from lessees and spent on fertilizer and lime, which is applied by the Plant, and accounts for about 30-50 percent of the total. In addition, about \$130,000 is spent on program and local administration costs, including the Natural Resources Manager salary, and about \$130,000 is spent on USACE administration. Thus, the program averages about \$300,000 to \$500,000 in cash annually. Projects anticipated to be funded with agricultural funds during 2013-2017 are listed in Table 7.5.3.

Table 7.5.3 Agricultural Funds Projects

Funding in thousands of dollars.

Project	INRMP Section	FY 18	FY 19	FY 20	FY 21	FY 22	Totals
Ecosystem Management Coordination	4.2.1.2	Funded within INRMP Implementation Staffing and Training project					
Integrated Natural Resources Management Planning	4.2.2.2	Funded within INRMP Implementation Staffing and Training project				\$50	\$50
Soils Management	4.3.2	Funded within INRMP Implementation Staffing and Training project					
Water Resources Management	4.4.2	Funded within Operations Support Division programs					
Habitat Management	4.6.2	Funded within INRMP Implementation Staffing and Training project					
Fish and Wildlife Management	4.7.2	Funded within INRMP Implementation Staffing and Training project and Sikes Act funding					
Federally-listed Species Management	4.8.1.2	\$0	\$0	\$0	\$0	\$0	\$0*
Nonfederally-listed Sensitive Species Management	4.8.2	\$0*	\$0*	\$0*	\$0*	\$0*	\$0*
Agricultural Outlease Management	4.10.2	Funded within INRMP Implementation Staffing and Training project					
Pest Management Support	4.11.2	Funded within INRMP Implementation Staffing and Training project					
Fire Management	4.13.2	Funded within INRMP Implementation Staffing and Training project					
Outdoor Recreation	4.14.2.2	Funded within INRMP Implementation Staffing and Training project and Sikes Act funding					
Natural Resources Enforcement	5.1.2	Funded within INRMP Implementation Staffing and Training project and other organizations/agencies					
Conservation Awareness	5.2.2	Funded within INRMP Implementation Staffing and Training project					
Cultural Resources Protection	5.3.2	Funded within INRMP Implementation Staffing and Training project					
Use of NEPA	5.4.2.2	Funded within Operations Support Division programs					
INRMP Implementation/Staffing/ Training	7.2.1.2	\$1,200	\$1,200	\$1,200	\$1,250	\$1,275	\$6,125
Data Storage, Retrieval, and Analysis	7.3.2	Funded within INRMP Implementation Staffing and Training project					
Total		\$1,200	\$1,200	\$1,200	\$1,250	\$1,325	\$6,175

* Funding needs would increase if these species were discovered or a known species status changed.

7.5.4 Environmental Funds

The Environmental Program Requirements report provides the primary means for identifying the current and projected environmental requirements and resources needed to execute the IAAAP natural resources program. The Environmental Program Requirements report satisfies the Army's reporting requirements as specified in Executive Order 12088, Office of Management and Budget Circular A-11, and other federal directives.

Environmental funds are a special subcategory of Operations and Maintenance funds. They are set aside by the Department of Defense for environmental purposes but are still subject to restrictions of Operations and Maintenance funds. Regulatory compliance is the key to getting environmental funding. Environmental funds are most commonly used for projects that return the installation to compliance with federal or state laws, especially if noncompliance is accompanied by Notices of Violation or other enforcement agency actions.

The IAAAP Natural Resources program does not normally receive Operations and Maintenance funds. The Plant may, on occasion, receive Operations and Maintenance funding through a Headquarters funded (year end or nationwide) type project.

7.5.5 Other Funding

IAAAP expects proponents of projects that affect natural resources to pay for required mitigation. Such projects often involve construction that requires surveys, monitoring, permits and mitigation, addressing wetland issues, and perhaps ongoing management to meet ESA Section 107 and/or National Historic Preservation Act Section 106 requirements. Such funding requirements cannot be estimated for the next five years.

7.6 INRMP Implementation Costs

Table 7.6 is a summary of funding avenues and dollars required for implementation of this INRMP.

Table 7.6 INRMP Implementation Costs

Funding in thousands of dollars.

Type Funds Anticipated	Section	FY 19	FY 20	FY 21	FY 22	FY 23	Totals
Forestry*	7.5.1	\$0	\$0	\$0	\$0	\$0	\$0
Sikes Act	7.5.2	\$18	\$19	\$22	\$23	\$25	\$107
Agriculture	7.5.3	\$1,200	\$1,200	\$1,200	\$1,250	\$1,325	\$6,175
Totals		\$1,218	\$1,219	\$1,222	\$1,273	\$1,350	\$6,282

* Retained as a funding option during 2018-2023.

Thus, total five-year funding to implement this INRMP will be \$6,282,000.

7.7 Command Support

Command support is essential to implementation of this INRMP. Many projects for natural resources management within the next five years require command support. This INRMP has the support of the IAAAP Commander and other personnel in command positions who are needed to implement this INRMP. The Command is dedicated to implementation of this INRMP, as required by the Sikes Act and other federal laws. Just as importantly, the Command is dedicated to maintaining and improving the military mission at IAAAP. Implementation of this INRMP is a means to that end.

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8.0 ENVIRONMENTAL CONSEQUENCES AND CONCLUSIONS

This section of the document assesses known, potential, and reasonably foreseeable environmental consequences related to implementing the INRMP and managing natural resources at IAAAP. Section 8.1, *Impacts Common to Both Alternatives* lists areas where neither the No Action Alternative (**Current Management**) nor the Preferred Alternative (**Proposed Management**) (*i.e.*, implementation of this INRMP) would discernibly affect resources. Section 8.2, *Environmental Consequences Analyses* addresses implementation of both alternatives on other environmental resources. This assessment considers implementation of management measures in their entirety (as summarized in Appendix 7.4, *List of INRMP Goals and Objectives*). Cumulative effects are discussed in Section 8.3, *Cumulative Effects*. A summary of potential environmental consequences associated with the No Action Alternative and the Preferred Alternative is presented in Section 8.4, *Summary of Potential Environmental Consequences*.

As discussed in Section 1.5.4, *Alternatives*, the updated EA addresses two alternatives: **Current Management** (No Action Alternative) and **Proposed Management** (Preferred Alternative). Other management alternatives were considered during the screening process but were eliminated because they were economically infeasible, ecologically unsound, or incompatible with requirements of the military mission.

The IAAAP INRMP is a living document that focuses on a 5-year planning period based on past and present actions. Short-term management practices included in the plan have been developed without compromising long-range goals and objectives. Because the plan will be reviewed annually and will undergo a major review every five years, additional environmental analyses may be required as new management measures are developed over the long-term (*i.e.*, beyond 5 years).

8.1 Impacts Common to Both Alternatives

The Preferred Alternative is the professionally-guided evolution of programs within the No Action Alternative. Both alternatives are similar in their effects with the primary difference being one of improvements in managed resources under the Preferred Alternative with many impacts to resources being similar.

No discernable adverse effects were identified or anticipated for the No Action Alternative or the Preferred Alternative for the following environmentally-related areas: Physiography, Topography, and Geology; Petroleum and Minerals; Climate; Noise Environment; Hazardous and Toxic Materials; Facilities, Public Services and Utilities; Socioeconomics; Environmental Justice; and Environmental Health and Safety Risks for Children (Section 1.5.5, *Issues Not Considered to be Potentially Significant*).

8.2 Environmental Consequences Analyses

Expected consequences of the No Action and Preferred alternatives for each resource area are presented in the following paragraphs.

8.2.1 Soils

Under both alternatives, soil integrity is managed and protected through planning via the NEPA; implementation of appropriate vegetation management practices, such as restoration of prairie areas, monitoring grazing leases, and protection of riparian areas; and using agricultural practices, such as contour and minimum-till farming. An example of an action that would create significant impacts to soils on IAAAP

would be construction activities (*e.g.*, new production line, improved roads). Neither alternative would create conditions that lead to significant impacts to soils.

No Action Alternative (Current Management)

Beneficial effects would be expected to continue under the No Action Alternative. Implementation of the No Action Alternative would involve more reactive management to problems after their occurrence, rather than managing the resource to prevent impacts or to minimize the extent of unavoidable impacts.

Preferred Alternative (Implementation of this INRMP)

Beneficial effects would be expected to continue under the Preferred Alternative. However, this Alternative offers a more progressive and integrated program for the planning of land use and maintenance and repair of damaged lands than the No Action Alternative. The Preferred Alternative includes the next generation of the soils management program that has evolved over decades of active management on IAAAP. Brief periods of increased erosion would occur during damaged sites' maintenance and rehabilitation activities, but these would be relatively minor compared to erosion control benefits. There may be slight increases in erosion during bare ground aspects of projects that disturb the soil, such as firebreak maintenance, but the plan includes provisions to minimize erosion during and following these actions primarily using vegetation for soil stabilization. The discontinuation of grazing leases in storage igloo areas under the Preferred Alternative would decrease soil erosion potential in these areas. The most significant change in the preferred alternative is the implementation and expansion (if applicable) of the aerial seeding of cover crops program. If successful, this program could be a significant tool used to address soil erosion. The Preferred Alternative offers effective protection and mitigation for damages incurred to soils due to the Army mission.

8.2.2 Water Resources

Under both alternatives, surface water quality requirements are met through implementation of proper vegetation management practices. Groundwater and surface water quality are maintained through pollution prevention programs and treatment and control of discharges.

Since surface waters and wetlands are regulated by executive order and federal and state laws and regulations, significance criteria are determined by compliance with these legal mandates as well as stewardship responsibilities associated with public lands. Examples of actions that would create significant impacts to surface waters and wetlands on IAAAP include:

- unpermitted deposition of dredged or fill material into wetlands or other "Waters of the U.S.", and
- a net loss of wetlands within installation boundaries (unmitigated).

Activities affected by both alternatives have some potential to affect surface waters and wetlands (*e.g.*, improper road maintenance) but not to the degree of other activities at IAAAP, such as munitions production and storage operations. Neither alternative is more prone than the other to such impacts. Neither alternative would create conditions that lead to significant impacts to surface waters, wetlands, or water quality.

No Action Alternative (Current Management)

Beneficial effects would be expected to continue under the No Action Alternative. Sedimentation of surface waters would be decreased under this alternative. Under the No Action Alternative, brief periods of increased erosion, and possibly minor sedimentation, would occur during site maintenance and rehabilitation activities, but these potential surface water impacts would be more than compensated through rehabilitation and establishment of vegetation of potentially erodible areas (*e.g.*, demolition area, agricultural field waterways), restrictions for vehicle movement and digging operations, and including

natural resources implications in military project planning. The No Action Alternative would not affect groundwater.

Preferred Alternative (Implementation of this INRMP)

There is no significant change between the No Action and Preferred Alternative.

8.2.3 Air Quality

Since air quality is regulated by laws and their implementing regulations, significance criteria are determined by compliance with air quality standards and operating permit criteria. Neither alternative would create conditions that lead to significant impacts to air quality. Potential effects on existing pollutant emissions are precluded by the fact that most current natural resource management actions do not involve activities that would significantly contribute to changes in existing air quality. However, some natural resources-related programs, particularly prescribed burning and to some degree operation of vehicles and heavy equipment, primarily by agricultural lessees, directly affect air quality.

No Action Alternative (Current Management)

Beneficial effects would be expected to continue. Prescribed burning negatively affects air quality; however, prescribed burning is conducted within local and state regulatory constraints. Vegetation management and restoration activities reduce airborne particulates (dust) through revegetation of bare ground areas.

Preferred Alternative (Implementation of this INRMP)

There is no significant change between the No Action and Preferred Alternative.

8.2.4 Flora

Native plant species and communities are managed and protected through planning via the NEPA, vegetation management practices, invasive species management, and other programs described in this INRMP. Protection and management of native plant species and communities at IAAAP are influenced by ecosystem management and biodiversity conservation principles, federal laws and executive orders, and general stewardship requirements associated with public lands, upon which significance criteria are determined. Examples of actions that would create significant impacts to native plant species and communities on IAAAP include:

- fragmentation, loss, or degradation of high quality natural or sensitive sites;
- local extirpation of rare or sensitive plant species; and/or
- the introduction or increased prevalence of undesirable non-native, invasive species.

Both alternatives have the same requirements to comply with federal laws (*e.g.*, Sikes Act, ESA) and regulations, executive orders 11990 (*Protection of Wetlands*) and 13112 (*Invasive Species*), and policy requirements to conserve native species biodiversity to maintain ecosystem functionality. Neither alternative would create conditions that lead to significant impacts to flora.

No Action Alternative (Current Management)

General. Beneficial effects would be expected to continue. Management would achieve compliance with laws, as well as provide benefits to floral resources.

Special Status Flora and Special Interest Areas. Special status flora and special interest areas would be afforded protection under the No Action Alternative, which would result in beneficial effects regarding protection of special status flora and special interest areas.

Wetlands. Beneficial effects would be expected to continue. IAAAP minimizes impacts that could result from mission-related activities on the Plant using the NEPA process and fully complies with wetland protection requirements.

Preferred Alternative (Implementation of this INRMP)

There is no significant change between the No Action and Preferred Alternative.

8.2.5 Fauna

The management of wildlife and aquatic species at IAAAP is influenced by ecosystem management and biodiversity conservation principles, federal laws and executive orders, state laws, and general stewardship requirements associated with public lands, upon which significance criteria are determined. Examples of actions that would create significant impacts to wildlife and aquatic species on IAAAP include:

- local population-level impacts (*e.g.*, potential to reduce local populations below self-sustaining levels or long-term loss or impairment of substantial portions of local habitat);
- direct impacts/disturbance to birds protected by the MBTA; and/or
- direct impacts/disturbance to candidate species for federal or state listing.

Since federally-listed species are regulated by the USFWS, per requirements of the ESA, significance criteria are determined by compliance with USFWS mandates. Examples of actions that would create significant impacts to federally-listed plants and animals include:

- a USFWS jeopardy opinion,
- a drastic change in available habitat,
- inhibiting natural expansion of existing populations,
- direct mortality or other unpermitted “take” of federally-listed species, and/or
- the loss of designated Critical Habitat.

Neither alternative would create conditions that lead to significant impacts to fauna.

No Action Alternative (Current Management)

General. Beneficial effects would be expected to continue for both game and nongame species. The health and condition of wildlife populations would be improved, and management measures to increase the abundance and biodiversity of wildlife at IAAAP would be implemented. Management measures to protect and enhance wildlife habitats (*e.g.*, aquatic, riparian, wetlands, terrestrial) would be implemented thereby increasing the quality and complexity of habitats. Above discussions involving soils, water resources, and flora would also apply to native fauna that require good soils, unpolluted waters, and quality habitat.

Special Status Fauna. Beneficial effects would be expected to continue for special status species that are not federally-listed. There would be few, if any, studies and surveys for these species. Federally-listed species management would be identical under both alternatives due to legally mandated requirements associated with the ESA.

Preferred Alternative (Implementation of this INRMP)

There is no significant change between the No Action and Preferred Alternative.

8.2.6 Cultural Resources

Since cultural resources and their protection/management are regulated by federal laws and national policy, significance criteria are determined by compliance with these laws and policies. An example of an action that would create significant impacts to cultural resources on IAAAP is irretrievable or irreversible damage to a prehistoric or historic site that is listed or is eligible for listing on the NRHP. IAAAP must comply with laws and policies related to cultural resources, and in this respect both alternatives would be similar in their effects. Neither alternative would create conditions that lead to significant impacts to cultural resources.

No Action Alternative (Current Management)

The No Action Alternative would have slightly beneficial effects on cultural resources. The agricultural lease management scheme, which has the potential to affect cultural resources, would be cognizant of the need to protect cultural resources.

Preferred Alternative (Implementation of this INRMP)

There is no significant change between the No Action and Preferred Alternative.

8.2.7 Outdoor Recreation

IAAAP is required by the Sikes Act to provide sustainable use of natural resources by the public to the extent that use is not inconsistent with needs of fish and wildlife resources or requirements to ensure safety and military security. Significance criteria are determined by compliance with the Sikes Act. An example of an action that would create significant impacts to recreation opportunities on IAAAP is a substantial decrease in the availability of recreational resources relative to historic baselines. Neither alternative would create conditions that lead to significant impacts to outdoor recreation.

No Action Alternative (Current Management)

Beneficial effects would be expected to continue, particularly for game species related to hunting and fishing. Game management programs are well established and, in general, are conducted in close cooperation with IDNR.

Preferred Alternative (Implementation of this INRMP)

There is no significant change between the No Action and Preferred Alternative.

8.2.8 Summary

No Action Alternative (Current Management)

The IAAAP natural resources program, as currently conducted, has no significant negative impacts to environmental and related resources. It is a quality program and is recognized as such. However, there are areas where improvements could be made, and some programs could take advantage of new scientific information and improved technologies. Therefore, implementation of the No Action Alternative is not favored.

Preferred Alternative (Implementation of this INRMP)

The current IAAAP natural resources program has areas where improvements could be made, and some programs could take advantage of new scientific information and improved technologies. The Preferred Alternative achieves these improvements and meets the goals and objectives as defined in this document. Standard use of the Land Use Control Procedures and the Aerial Seeding of Cover Crops program are the most significant improvements in the 2018-2023 INRMP. Therefore, implementation of the Preferred Alternative is favored. These findings are consistent with goals of the natural resources management program to maintain ecosystem functionality and ensure the sustainability of desired military lands

conditions. The nature of the management measures recommended by the INRMP, if implemented, would directly and positively affect the health and condition of natural resources at IAAAP.

8.3 Cumulative Effects

A cumulative effect is defined as an effect on the environment that results from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. Cumulative effects can result from individually minor, but collectively significant, actions taking place locally or regionally over a period of time.

Implementation of the updated INRMP would allow for adaptive management strategies to progress within the comprehensive environmental strategy for IAAAP that represents compliance, restoration, prevention, and conservation; improves the existing management approach for natural resources; and meets legal and policy requirements consistent with national natural resources management philosophies. Implementation would improve environmental conditions at IAAAP, both in the short- and long-term, as shown by the potential for beneficial effects in Table 8.4. Over time, adoption of the Preferred Alternative would enable IAAAP to achieve its goal of maintaining ecosystem viability and ensuring sustainability of desired military lands conditions. Any cumulative effects of implementing either alternative would be beneficial.

This INRMP, by design, incorporates current Plant planning documents and management plans and is to be reviewed and updated routinely (every five years at a minimum). INRMPs are designed to follow an ecosystem approach, which involves establishing partnerships with federal, state and local groups. These actions further reduce the possibility for cumulative effects arising that are not already considered within the INRMP. By its nature, ecosystem management has cumulative effects. As new, relevant issues or initiatives arise, either on or off-IAAAP, or within the state, local, or regional communities, they would be incorporated into the INRMP at either the annual review or five-year review periods. In this way, the INRMP is maintained as an active reference document that describes IAAAP's planned natural resources management for the current five-year period.

Outside of actions included in the INRMP, there exists the possibility of several general actions that may result in cumulative effects. For example, major changes in the IAAAP military mission, major funding and/or personnel reductions, and major changes in local/state planning and development (*e.g.*, change in land use of the surrounding area, major highway construction) could interact with natural resources management initiatives at IAAAP and result in cumulative effects.

The No Action Alternative, which continues natural resources management at the status quo, would be less able to respond effectively to significant changes in military mission, funding cuts, or major changes in off-IAAAP planning and development that interact with Plant resources than if the Preferred Alternative were implemented.

The Preferred Alternative takes advantage of lessons learned during implementation of the current and past iterations of the INRMP as well as new advances in science and technology of natural resources management. The Preferred Alternative contains sufficient flexibility in its initiatives to allow managers to modify, as necessary, their implementation approaches, schedules, etc. or to accommodate changes outside of their immediate control. Changes in mission, funding and/or personnel reductions, or changes in off-IAAAP land use planning and development, would be accommodated and incorporated into the subsequent update of the INRMP. The updating of the INRMP could realign management intensities to better correspond to current needs and account for cumulative effects.

Standard use of the Land Use Control Procedures and the Aerial Seeding of Cover Crops program are the most significant improvements in the 2018-2023 INRMP. Following the Land Use and Control Procedures and expanding the Aerial Seeding of Cover Crops program will benefit all natural resources on the IAAAP. Land Use and Control Procedures will ensure that negative impacts for future activities will be considered and addressed through avoidance, minimization, and/or mitigation. The Aerial Seeding of Cover Crops program will significantly reduce erosion and increase overall plant biomass on the installation. Both water and air quality will benefit due to this program. The additional cover and habitat provided by this program will also benefit many fauna species on the installation.

8.4 Summary of Potential Environmental Consequences

Table 8.4 Summary of Potential Environmental Consequences

Resource Area	Environmental Consequence*	
	No Action Alternative	Preferred Alternative
Physiography, Topography, and Geology	No Effect	No Effect
Petroleum and Minerals	No Effect	No Effect
Noise Environment	No Effect	No Effect
Climate	No Effect	No Effect
Facilities, Public Services, and Utilities	No Effect	No Effect
Hazardous and Toxic Materials	No Effect	No Effect
Socioeconomic Environment	No Effect	No Effect
Environmental Justice	No Effect	No Effect
Protection of Children	No Effect	No Effect
Soils	Less Beneficial	More Beneficial
Water Resources	Less Beneficial	More Beneficial
Air Quality	Less Beneficial	More Beneficial
Flora (General)	Less Beneficial	More Beneficial
Special Status Flora and Special Interest Areas	Less Beneficial	Beneficial
Wetlands	Less Beneficial	More Beneficial
Fauna (General)	Less Beneficial	More Beneficial
Special Status Fauna	Less Beneficial	More Beneficial
Cultural Resources	Less Beneficial	More Beneficial
Outdoor Recreation	Less Beneficial	Beneficial
Cumulative Impacts	Less Beneficial	More Beneficial

* No Effect: Actions have no known demonstrated or perceptible impacts

Beneficial: Actions have apparent beneficial effects

(Note: The terms “less” or “more” may be added to the terms “beneficial” or “negative” for comparison purposes between alternatives.)

8.5 Conclusions

8.5.1 INRMP Summary

This document reflects the commitment set forth by the Army to conserve, protect, and enhance the natural resources necessary to sustain the military mission on IAAAP. The primary purpose and objective of this document is to present an implementable INRMP that guides IAAAP in meeting mission requirements,

achieving natural resource management goals, and complying with environmental policies and regulations. In addition, the NEPA analysis required for undertaking this major federal action (*i.e.*, implementation of this plan) is embodied within the INRMP. The resultant “planning assessment” includes a comprehensive description, evaluation, and assessment of environmental conditions and natural resources at IAAAP.

This INRMP will direct the natural resources management program at IAAAP from 2018 through 2023. An ecosystem approach was used to develop management projects for each resource area. Implementation of management projects will maintain, protect, and enhance the ecological integrity of military lands and biological communities inhabiting them. In addition, natural resources management measures described in this plan will protect IAAAP ecosystems and their components from unacceptable damage or degradation and identify and restore previously degraded habitats.

8.5.2 NEPA Findings and Conclusions

The Preferred Alternative to implement the updated INRMP for IAAAP was analyzed by comparing potential environmental consequences against existing conditions. Findings indicate that, under the Preferred Alternative, potential consequences would result in either no significant adverse effects or beneficial effects on each resource area (see Section 8.2, *Environmental Consequences Analyses*). The affected environment would not be significantly or adversely impacted by proceeding with the Preferred Alternative. Additionally, no significant cumulative effects would be expected.

Based on the previous environmental assessment, implementation of the Preferred Alternative (full implementation of this updated INRMP) would have no significant environmental or socioeconomic effects. Because no significant effects would result from implementation of the Preferred Alternative, preparation of a new EA, environmental impact statement or Finding of No Significant Impact is not required, and preparation of a CX is appropriate for the 2018-2023 INRMP. The 2013 Finding of No Significant Impact can be found in Appendix 8.5.2.

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REFERENCES

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AGENCIES AND PERSONS CONTACTED

The following persons and agencies were either contacted during the draft plan preparation phase or asked to review this document.

Tyler Porter - Fish and Wildlife Biologist, USFWS Illinois/Iowa Ecological Services Field Office
Randy Doyle - Environmental Protection Specialist, IAAAP
Jarrett Pfimmer – Office of Natural Resources, Sac and Fox Nation of the Mississippi in Iowa
Joe Haffner - Natural Resources Manager, IAAAP
Tara Mack - Attorney, U.S. Army Sustainment Command
Tim Rhodd - Iowa Tribe of Kansas and Nebraska
Seth Moore – Threatened and Endangered Species, Iowa DNR
Tribal Chairperson - NAGPRA Coordinator, Sac and Fox Nation (Oklahoma)
Mike Kurth - Joint Munitions Command
Tribal Chairperson - Iowa Tribe of Oklahoma
Lisa Montgomery - Sac and Fox Nation of Missouri

PLAN PREPARERS

This INRMP/Categorical Exclusion was prepared Stantec Consulting Services Inc. (Stantec) with support from Joe Haffner, IAAAP Natural Resources Manager. Below are backgrounds of Stantec personnel involved with the preparation of the INRMP/Categorical Exclusion.

Mr. Jeffrey H. Schwierjohann began his career as an environmental consultant working with federal and state listed flora and fauna species in 1994. He has also worked as regional and section supervisors for state and county natural resources agencies. He conducted Masters level research into roosting preferences and forest management techniques for northern long-eared bats. He has worked extensively with Indiana, gray, Virginia big-eared, Rafinesque's, eastern small-footed, and little brown bats throughout the eastern US. Mr. Schwierjohann also held a Master Bird Banding Permit and has worked extensively on listed and non-listed bird, mammal, herptile, and plant research topics, baseline inventories, management plans, and regulatory compliance consultation projects. Mr. Schwierjohann has held advisory positions and served on the Boards and/or as an officer on several environmental NGOs. He has also filled supervisory roles on major consultations for both regulatory agencies and industrial clients and has successfully completed formal consultations on several threatened and endangered species related projects. At Stantec, he is responsible for regulatory document production (e.g., Section 7 & 10, NEPA) and designing and managing natural resource studies in support of regulatory compliance and permitting for clients in the energy, transportation, government and private sectors.

Mr. Terry VanDeWalle is a Senior Biologist with over 25 years of experience specializing in animal and natural areas surveys, herpetology, threatened and endangered species surveys, ESA Section 7 and Section 10 consultation, wetland delineation and permitting, wetland mitigation design and monitoring, and coordination of environmental impact statements and assessments. Terry specializes in herpetology and is a recognized expert in the Midwest and has authored and co-authored peer-reviewed papers and regional herpetological guides. In addition, he has been involved with wildlife rehabilitation in the Midwest for over 20 years and currently serves on the Board of Directors of the Iowa Wildlife Center and is an Adjunct Professor at Hawkeye Community College where he teaches a course on Wildlife Ecology. At Stantec, he is responsible for managing Stantec's Independence, Iowa office and designing and managing natural

resource studies in support of regulatory compliance and permitting for clients in the energy, transportation, governmental and private sectors.

The previous version of the INRMP/EA was prepared by:

Gene Stout and Associates has prepared various INRMPs, National Environmental Policy Act, and other natural/cultural resources planning documents for almost 200 military installations in the United States. Mr. Stout has Bachelor of Science and Master of Science degrees in Zoology with an emphasis on wildlife biology. Mr. Stout has 37 years of experience with Department of Defense environmental programs and was responsible for natural resources management and National Environmental Policy Act compliance at Fort Sill, Oklahoma for 18 years.

Jeffrey S. Trousil - Natural Resources Consultant and Principle Author of the INRMP - Mr. Trousil has a Bachelor of Sciences in Wildlife. Mr. Trousil worked in the natural resources area within or for various federal agencies (primarily the Department of Army) for 10 years. Subsequently Mr. Trousil has worked as a consultant for Department of Defense natural resources programs for 14 years.

DISTRIBUTION LIST

Joint Munitions Command, Rock Island Arsenal
Rock Island, Illinois

Iowa Department of Natural Resources
Des Moines, Iowa

U.S. Fish and Wildlife Service, Rock Island Ecological Services Field Office
Moline, Illinois

ACRONYMS

AR	Army Regulation
CX	Categorical Exclusion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
DoD	Department of Defense
EA	Environmental Assessment
ESA	Endangered Species Act (USFWS)
ESMP	Endangered Species Management Plan
F	Fahrenheit
FONSI	Finding of No Significant Impact
GIS	Geographic Information System
IAAAP	Iowa Army Ammunition Plant
IDNR	Iowa Department of Natural Resources
INRMP	Integrated Natural Resources Management Plan
MBTA	Migratory Bird Treaty Act (USFWS)
msl	Mean sea level
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
TNT	Trinitrotoluene
U.S.	United States
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

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**INTEGRATED NATURAL RESOURCES
MANAGEMENT PLAN
IOWA ARMY AMMUNITION PLANT
IOWA**

APPENDICES

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Appendix 1.3.6 Regulatory Instruments that May Affect Natural Resources Management on Iowa Army Ammunition Plant

Below is a list of the most significant, but not complete, federal and state laws and regulations and other regulatory instruments that may affect implementation of this INRMP.

Federal Laws

American Indian Religious Freedom Act (42 United States Code (USC) 1996-1996a)
Americans with Disabilities Act of 1990 (PL 101-336; 42 USC 12101)
Archaeological and Historic Preservation Act of 1974 (PL 93-291; 16 USC 469 *et seq.*)
Archaeological Resources Protection Act of 1979 (PL 96-95; 16 USC 470aa-11)
Assimilative Crimes Act (18 USC 13)
Bald and Golden Eagle Protection Act (PL 86-70, as amended)
Clean Air Act (as amended through 1990) (42 USC 7401-7642)
Clean Water Act (33 USC 1251-1387)
Conservation and Rehabilitation Program on Military and Public Lands (PL 93-452)
Conservation Programs on Military Reservations (PL 90-465)
Defense Appropriations Act of 1991 (Legacy Program)
Endangered Species Act of 1973 (PL 95-632, as amended)
Federal Facilities Compliance Act of 1992 (PL 102-386; amending 42 USC 6961)
Federal Insecticide, Fungicide and Rodenticide Act (7 USC 136 *et seq.*)
Federal Water Pollution Control Act Amendments of 1972 (PL 92-522)
Fish and Wildlife Conservation Act of 1980 (PL 96-366; 16 USC 2901)
Fish and Wildlife Coordination Act (PL 85-624)
Fish and Wildlife Conservation and Natural Resource Management Programs on Military Reservation (Amends Public Law 86-797 (Sikes Act) (PL 96-561))
Hunting, Fishing and Trapping on Military Lands (an update to the Military Construction Authorization Act 10 USC 2665)
Leases Non-Excess Property of Military Departments (10 USC 2667)
Migratory Bird Conservation Act (Chapter 257; 45 Stat 1222; 16 USC 715 *et seq.*)
Migratory Bird Treaty Act (PL 65-186; 16 USC 703 *et seq.*)
National Environmental Policy Act of 1969 (as amended, PL 91-190; 42 USC 4321 *et seq.*)
National Historic Preservation Act of 1966 (as amended, PL 89-665; 16 USC 470 *et seq.*)
Native American Graves Protection and Repatriation Act (25 USC, Section 3001 *et seq.*)
Non-game Act (PL 93-366)
Noxious Plant Control Act (PL 90-583)
Outdoor Recreation on Federal Lands (16 USC 4601{1})
Plant Protection Act of 2000 (replaces Federal Noxious Weed Act of 1973 (PL 93-629))
Readiness and Environmental Protection Initiative (within Section 2811, FY 2003 Defense Authorization Act) (10 USC 2684a)
Sikes Act (PL 105-85, as amended through 1997; 16 USC 670 *et seq.*)
Soil Conservation Act of 1938 (16 USC 5901 *et seq.*)
Timber Sales on Military Lands [An update of the Military Construction Authorization Act] (10 USC 2665)
Watershed Protection and Flood Prevention Act (PL 92419; 68 Stat 666, as amended & 86 Stat 667; 16 USC 1001)

Executive Orders and Presidential Memoranda

Executive Order 11593, Protection and Enhancement of the Cultural Environment
Executive Order 11644, Use of Off-Road Vehicles on the Public Lands
Executive Order 11987, Exotic Organisms
Executive Order 11988, Floodplain Management
Executive Order 11989, Off-Road Vehicles on Public Lands
Executive Order 11990, Protection of Wetlands
Executive Order 11991, Protection and Enhancement of Environmental Quality: Amends Executive Order 11514
Executive Order 12608, Protection of Wetlands: Amends Executive Order 11990
Executive Order 12898, Environmental Justice
Executive Order 13007, Indian Sacred Sites
Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks
Executive Order 13112, Invasive Species
Executive Order 13148, Greening the Government through Leadership in Environmental Management
Executive Order 13175, Consultation and Coordination with Indian Tribal Governments
Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds
Executive Order 13423, Strengthening Federal Environmental, Energy, and Transportation Management
Executive Order 13443, Facilitation of Hunting Heritage and Wildlife Conservation
Presidential Memorandum, Environmentally and Economically Beneficial Practices on Federal Landscaped Grounds (April 26, 1994)
Presidential Memorandum, Government-to-Government Relations with Native American Tribal Governments

Department of Defense (DoD) Directives/Instructions

DoD Directive 4150.7, DoD Pest Management Program
DoD Directive 4710.1, Archaeological and Historic Resources Management
DoD Instruction 4715.1, Environmental Security
DoD Instruction 4715.03, Natural Resources Conservation Program
DoD Instruction 4715.9, Environmental Planning and Analysis
DoD Instruction 5000.13, Natural Resources
DoD Directive 6050.1, Environmental Effects in the United States of DOD Actions
DoD Directive 6050.2, Use of Off-Road Vehicles on DOD Lands
DoD Directive 7310.5, Accounting for Production and Sale of Forest Products
Department of Defense, American Indian and Alaska Native Policy

Army Regulations (AR) and Related Code of Federal Regulations

AR 190-11, Physical Security of Arms, Ammunition, and Explosives
AR 200-1, Environmental Protection and Enhancement (Department of the Army 2007)
AR 200-2, Environmental Analysis of Army Actions, 32 CFR Part 651
AR 215-1, Morale, Welfare, and Recreation Activities and Nonappropriated Fund Instrumentalities

IAAAP Regulations

IAAAP Reg 420-1, Hunting and Fishing Regulation

Iowa (IA) Regulations

Hunting and Trapping Regulations
Fishing Regulations

Appendix 1.5.6 INRMP/Categorical Exclusion Correspondence



DEPARTMENT OF THE ARMY

IOWA ARMY AMMUNITION PLANT
17571 DMC HIGHWAY 79
MIDDLETOWN, IOWA 52638-5000

REPLY TO
ATTENTION OF

January 22, 2018

Contract Administration Division

Iowa Tribe of Kansas & Nebraska
Attn: Tim Rhodd
Executive Committee
3345 B. Thrasher Rd.
White Cloud, KS 66094

Dear Mr. Rhodd:

The Iowa Army Ammunition Plant (IAAAP) has begun the process of updating its current Integrated Natural Resources Management Plan and Environmental Assessment (INRMP/EA). Our revised INRMP will be for the period of 2018-2023.

The contractor assisting us in this revision is Stantec Consulting Services Inc. We are sending you this letter to invite you to review and comment on the draft of this INRMP/EA. We welcome any comments or new items that you would like to see included in the INRMP/EA. Please send us your decision to review and comment. If you wish to review and comment please send us the reviewer's point of contact (POC) information via the POC listed below.

Should you notify us that you would like to review the draft INRMP/EA, we hope to have a draft for your review to you by March 2018.

We appreciate your help with the INRMP/EA review and we look forward to working with you on this effort.

If you have any questions. Please contact our Natural Resources Manager Mr. Joe Haffner by letter, email (joseph.j.haffner.civ@mail.mil), or phone (319) 753-7903.

Sincerely,

Stephen T. Koehler
Lieutenant Colonel, US Army
Commanding



DEPARTMENT OF THE ARMY

IOWA ARMY AMMUNITION PLANT
17571 DMC HIGHWAY 79
MIDDLETOWN, IOWA 52638-5000

REPLY TO
ATTENTION OF

January 22, 2018

Contract Administration Division

Tribal Chairperson
Iowa Tribe of Oklahoma
Office of Environmental Service
501 E Highway 33
Perkins, OK 74059

Dear Tribal Chairperson:

The Iowa Army Ammunition Plant (IAAAP) has begun the process of updating its current Integrated Natural Resources Management Plan and Environmental Assessment (INRMP/EA). Our revised INRMP will be for the period of 2018-2023.

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If you have any questions. Please contact our Natural Resources Manager Mr. Joe Haffner by letter, email (joseph.j.haffner.civ@mail.mil), or phone (319) 753-7903.

Sincerely,

A handwritten signature in black ink, appearing to read "SK", is positioned above the printed name of the signatory.

Stephen T. Koehler
Lieutenant Colonel, US Army
Commanding



DEPARTMENT OF THE ARMY

IOWA ARMY AMMUNITION PLANT
17571 DMC HIGHWAY 79
MIDDLETOWN, IOWA 52638-5000

REPLY TO
ATTENTION OF

January 22, 2018

Contract Administration Division

Mr. Jarrett Pfimmer
Meskwaki Nation, Sac and Fox Nation of the Mississippi in Iowa
Office of Natural Resources
1826 340th Street
Tama, IA 52339

Dear Mr. Pfimmer:

The Iowa Army Ammunition Plant (IAAAP) has begun the process of updating its current Integrated Natural Resources Management Plan and Environmental Assessment (INRMP/EA). Our revised INRMP will be for the period of 2018-2023.

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DEPARTMENT OF THE ARMY

IOWA ARMY AMMUNITION PLANT
17571 DMC HIGHWAY 79
MIDDLETOWN, IOWA 52638-5000

REPLY TO
ATTENTION OF

January 22, 2018

Contract Administration Division

Tribal Chairperson
Sac and Fox Nation
Office Environmental Services
356263 E. 926 Rd.
Stroud, OK 74079

Dear Tribal Chairperson:

The Iowa Army Ammunition Plant (IAAAP) has begun the process of updating its current Integrated Natural Resources Management Plan and Environmental Assessment (INRMP/EA). Our revised INRMP will be for the period of 2018-2023.

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Sincerely,

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Stephen T. Koehler
Lieutenant Colonel, US Army
Commanding



DEPARTMENT OF THE ARMY

IOWA ARMY AMMUNITION PLANT
17571 DMC HIGHWAY 79
MIDDLETOWN, IOWA 52638-5000

REPLY TO
ATTENTION OF

January 22, 2018

Contract Administration Division

Ms. Lisa Montgomery
Sac and Fox Nation of Missouri
Environmental Department
305 North Main Street
Reserve, KS 66434

Dear Ms. Montgomery:

The Iowa Army Ammunition Plant (IAAAP) has begun the process of updating its current Integrated Natural Resources Management Plan and Environmental Assessment (INRMP/EA). Our revised INRMP will be for the period of 2018-2023.

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Stephen T. Koehler
Lieutenant Colonel, US Army
Commanding



DEPARTMENT OF THE ARMY

IOWA ARMY AMMUNITION PLANT
17571 DMC HIGHWAY 79
MIDDLETOWN, IOWA 52638-5000

REPLY TO
ATTENTION OF

January 22, 2018

Contract Administration Division

Iowa Department of Natural Resources
Attn: Mr. Chuck Gipp
Wallace State Office Building
502 East 9th Street, 4th Floor
Des Moines, IA 50319-0034

Dear Mr. Gipp:

The Iowa Army Ammunition Plant (IAAAP) has begun the process of updating its current Integrated Natural Resources Management Plan and Environmental Assessment (INRMP/EA). Our revised INRMP will be for the period of 2018-2023.

The contractor assisting us in this revision is Stantec Consulting Services Inc. It is our intent to provide you with a draft of the INRMP/EA for your review. However, we also welcome any comments on new items that you would like to see included in the INRMP/EA.

Minimal revisions have been made to the plan since the last iteration, we hope to have a draft for your review to you by March 2018. Please forward to us your reviewer point of contact (POC) information via the POC listed below.

We request any assistance you can provide with this matter to keep our INRMP/EA current. We appreciate your help with our INRMP in the past, and look forward to working with you on this effort.

If you have any questions. Please contact our Natural Resources Manager Mr. Joe Haffner by letter, email (joseph.j.haffner.civ@mail.mil), or phone (319) 753-7903.

Sincerely,

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Stephen T. Koehler
Lieutenant Colonel, US Army
Commanding



DEPARTMENT OF THE ARMY

IOWA ARMY AMMUNITION PLANT
17571 DMC HIGHWAY 79
MIDDLETOWN, IOWA 52638-5000

REPLY TO
ATTENTION OF

January 22, 2018

Contract Administration Division

U.S. Fish and Wildlife Service
Attn: Mr. Kraig McPeck
Rock Island Ecological Services Field Office
1511 47th Avenue
Moline, Illinois 61265

Dear Mr. McPeck:

The Iowa Army Ammunition Plant (IAAAP) has begun the process of updating its current Integrated Natural Resources Management Plan and Environmental Assessment (INRMP/EA). Our revised INRMP will be for the period of 2018-2023.

The contractor assisting us in this revision is Stantec Consulting Services Inc. It is our intent to provide you with a draft of the INRMP/EA for your review. However, we also welcome any comments on new items that you would like to see included in the INRMP/EA.

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If you have any questions. Please contact our Natural Resources Manager Mr. Joe Haffner by letter, email (joseph.j.haffner.civ@mail.mil), or phone (319) 753-7903.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Koehler", is written over the typed name.

Stephen T. Koehler
Lieutenant Colonel, US Army
Commanding



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Illinois & Iowa ES Field Office
1511 47th Avenue
Moline, Illinois 61265
Phone: (309) 757-5800 Fax: (309) 757-5807

IN REPLY REFER
TO:

FWS/IL-IAFO

May 14, 2018

Joseph Haffner
Management Agronomist
Natural Resources Manager
Iowa Army Ammunition Plant
17571 DMC Highway 79
Middletown, Iowa 52638

Dear, Mr. Haffner:

This is in response to the request for comments on the draft Integrated Natural Resources Management Plan and Categorical Exclusion 2018 – 2023, dated April 10, 2018, for the Iowa Army Ammunition Plant (IAAAP), Middletown, Des Moines County, Iowa. These comments are provided under the authority of and in accordance with the provisions of the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.); Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.); the Migratory Bird Treaty Act (40 Stat. 755, as amended; 16 U.S.C. 703 et seq.) and, the National Environmental Policy Act (83 Stat. 852, as amended P.L. 91-190, 42 U.S.C. 4321 et seq.). We offer the following comments for your consideration.

Fish and Wildlife Resources

The information you provided indicates that tree clearing may occur within forested areas. The Service recommends that impacts to wetlands and forested habitats be avoided or impacts minimized to the greatest extent possible to reduce impacts to potential habitat for the Indiana bat, northern long-eared bat, and migratory birds. If forest habitats and/or wetlands are impacted an appropriate mitigation plan should be developed and coordinated with the Service.

Threatened and Endangered Species

To facilitate compliance with Section 7(c) of the Endangered Species Act of 1973, as amended, Federal agencies are required to obtain from the Fish and Wildlife Service (Service) information concerning any species, listed or proposed to be listed, which may be present in the area of a proposed action. A current list of species in Iowa by county can be found at the following

website: <http://www.fws.gov/midwest/endangered/lists/illinois-cty.html>. You can also visit our Information, Planning, and Conservation System (IPaC) at the link below to determine whether any threatened and endangered species, designated critical habitat, or other natural resources of concern may be affected by your proposed project and to obtain a preliminary or official U.S. Fish and Wildlife species list.

<https://ecos.fws.gov/ipac/>

There is no designated critical habitat in the project area at this time. Information in your letter indicates that trees may need to be removed for this project. We understand that a summer habitat assessment has been completed for this project and that suitable habitat exists in the project area. The Service recommends that any tree clearing be minimized or avoided if possible. If tree clearing is necessary, it should not occur during the April 1 thru September 30 time frame to avoid impacting the Indiana bat and northern long-eared bat. If it is necessary to clear trees during the April 1 to September 30th time frame, other approved surveys may need to be conducted in order to assess the value of the habitat to Indiana bats and northern long-eared bats and ascertain whether they occur in the areas to be cleared.

Although the bald eagle has been removed from the threatened and endangered species list, it continues to be protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act (BGEPA). The Service developed the National Bald Eagle Management Guidelines to provide landowners, land managers, and others with information and recommendations regarding how to minimize potential project impacts to bald eagles, particularly where such impacts may constitute "disturbance," which is prohibited by the BGEPA. The Service is unaware of any bald eagle nests in the project area; however, if a bald eagle nest is found in the project area or vicinity of the project area then our office should be contacted and the guidelines implemented. A copy of the guidelines is available at:

<http://www.fws.gov/midwest/eagle/pdf/NationalBaldEagleManagementGuidelines.pdf>

Thank you for your continued coordination with our office to establish conservation measures for federal trust resources and further our understanding of wind-wildlife interactions. If you have any questions regarding our comments, please contact Tyler Porter of my staff at (309) 757-5800, extension 221.

Sincerely,



Kraig McPeck
Field Supervisor

2013 FONSI

FINDING OF NO SIGNIFICANT IMPACT INTEGRATED NATURAL RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT IOWA ARMY AMMUNITION PLANT

1. Description of Action. The Iowa Army Ammunition Plant, Middletown, Iowa proposes to implement an Integrated Natural Resource Management Plan for the period 2013-2018 to manage natural resources, support the military mission, and comply with various environmental laws.

Implementation would be ongoing operations over the five-year period using both in-house and external personnel. The primary thrust of the program would be to survey and monitor natural resources and implement programs to conserve and manage them in a proactive manner, complying with environmental laws and regulations.

2. Anticipated Environmental Effects. Any minor, negative impacts of implementation of the Integrated Natural Resources Management Plan would be more than offset by positive impacts of implementing this plan. No adverse impact is expected to occur to any federal-listed threatened or endangered plant or animal species.

No significant adverse impacts are anticipated for noise, air quality, geology, soils, water resources, biological resources, cultural resources, socio-economics, or environmental justice. This proposed action would either not impact or positively impact these resources.

3. Conclusions. Based on a review of the information contained in environmental assessment portions of the Integrated Natural Resources Management Plan, it is concluded that implementation of the Iowa Army Ammunition Plant Integrated Natural Resources Management Plan is not a major federal action that would significantly affect the quality of the environment within the meaning of Section 102(2)(c) of the National Environmental Policy Act of 1969, as amended. Accordingly, the preparation of an Environmental Impact Statement for this proposed action is not required.

4. Point of Contact. Requests for further information or submittal of public comments may be made for 30 days after first publication date to:

Commander, Iowa Army Ammunition Plant
ATTN: Annette Parchet
Public Affairs Officer
Iowa Army Ammunition Plant, JMIA-AA
17571 Hwy. 79, Middletown, IA 52638
Phone: 319-753-7001

Submitted by:
/s/Joseph J. Haffner II
Natural Resources Manager
Iowa Army Ammunition Plant

Approved by:
/s/Michael C. Bruens
Lieutenant Colonel, Logistics Corps
Commander, Iowa Army Ammunition Plant
February 22, 2013_1t

Appendix 2.3.1 Items of Cooperation Among the U.S. Fish and Wildlife Service, Iowa Department of Natural Resources, and Iowa Army Ammunition Plant, Iowa

PURPOSE: The purpose of this document is to specifically list items to be provided by the Iowa Department of Natural Resources (IDNR), U.S. Fish and Wildlife Service (USFWS), and Iowa Army Ammunition Plant (IAAAP) for cooperative implementation of the IAAAP Integrated Natural Resources Management Plan (INRMP). Items not specifically listed will generally be the responsibility of IAAAP unless the other agencies agree to assist with their implementation.

AUTHORITY: In accordance with the authority contained in Title 10, U.S. Code, Section 2671, and Title 16, U.S. Code, Section 670a, the Department of Defense, Department of Interior, and the State of Iowa, through their duly designated representatives whose signatures appear on the IAAAP INRMP, approve the INRMP and the below specific items of cooperation among the three agencies.

MUTUAL AGREEMENT:

- Persons hunting, trapping, or fishing the lands or waters of IAAAP shall be required to obtain special IAAAP hunting, trapping, or fishing permits, unless exempt by IAAAP regulations. IAAAP reserves the right to charge for these permits. Any funds derived from the sale of these permits will be used exclusively for the implementation of the IAAAP INRMP in accordance with Army regulations and the Sikes Act. Fees charged shall be established by IAAAP in accordance with Army regulations. Persons guilty of violating the requirement for these special permits may be prosecuted under 10 USC 2671(c).
- Persons hunting, trapping, or fishing the lands of IAAAP must purchase state licenses, tags, and stamps as required by IDNR, unless exempt by IDNR regulations.
- All hunting, trapping, and fishing on IAAAP will be in accordance with federal and state fish and game laws.
- Representatives of IDNR and USFWS will be admitted to IAAAP at reasonable times, subject to requirements of military necessity and security.
- IDNR and USFWS shall furnish technical assistance for development and implementation of professionally sound natural resources programs on IAAAP provided funding for such support is available.
- IAAAP shall furnish assistance and facilities to IDNR and/or USFWS for mutually agreed upon natural resources research projects provided funding for such support is available. It shall be the policy of the Commander, IAAAP to encourage and support research conducted by the participating agencies. To this end, suitable land areas, animals, facilities, and personnel may be made available at the Commander's discretion, when requested, providing the proposed studies are compatible with, and in no way limit, accomplishment of the military mission.
- No exotic species of fish or wildlife will be introduced on IAAAP lands without prior written approval of the Army, IDNR, and the USFWS.
- IDNR shall establish statewide seasons and bag limits for the harvest of game species. IAAAP may make special requests for such regulations or impose more stringent seasons or bag limits. Requests for regulations not in accordance with those established statewide will be based on data specific to IAAAP or designed to meet IAAAP's military mission needs. Such as the established designation of an IAAAP deer population management zone which is beneficial to the management of the deer herd on IAAAP.

- Hunting, trapping, and fishing on IAAAP will be authorized and controlled by the Commander in accordance with locally published IAAAP regulations promulgated in compliance with applicable federal and state laws, Army regulations, military requirements, and the INRMP.
- IAAAP will collect data on harvested deer and turkey. IDNR may collect additional data on fish or wildlife resources at IAAAP with approval of IAAAP for access to military lands.
- Public access for hunting, trapping, and fishing is approved under a system of controls established by IAAAP in cooperation with IDNR. Quotas are set on the number of hunters permitted on a daily or seasonal basis for reasons of safety or harvest management. Hunting, trapping, and fishing will be allowed only on those areas where there is no conflict with military mission activities and no unreasonable safety hazard to military personnel and dependents, Army civilian employees, or the public. Certain areas will be closed to hunting, trapping, and fishing, including but not limited to production areas.
- IAAAP has concurrent jurisdiction with regard to law enforcement. State or federal commissioned officers can enforce laws on IAAAP. Enforcement will be a joint responsibility of IAAAP, IDNR, and the USFWS. USFWS will assist with enforcement of federal laws as requested by IAAAP and as feasible given funding and personnel limitations.
- IAAAP agrees to cooperate with USFWS and IDNR for management of any threatened or endangered species residing on IAAAP. Such efforts will be in compliance with federal and state laws and applicable Army regulations.
- IDNR and USFWS will provide technical and professional advice on matters concerning wildlife and fish management when necessary. IDNR will provide technical wildlife and fisheries assistance on a non-reimbursable basis, except in specific mutually agreeable instances. Assistance from the USFWS will be provided within funding and personnel limitations.
- IAAAP has the option to directly transfer funds to the IDNR or USFWS for implementation of this INRMP.
- It is understood that implementation of this INRMP requires certain latitude with regard to professional decisions. However, IAAAP agrees that any land-use change which significantly impacts natural resources must include modification of this INRMP in addition to any other environmental compliance requirements.

LIMITATIONS:

The military mission of IAAAP supersedes natural resources management and associated recreational activities; and, such activities must in all instances be compatible with the military mission. However, where there is conflict between the military mission and provisions of the ESA, the Sikes Act, or any other law associated with natural resources conservation, such conflicts will be resolved according to statutory requirements.

REQUIRED REFERENCES:

- Nothing contained in this agreement shall modify any rights granted by treaty to any American Indian tribe or to members thereof.
- The possession of a special permit for hunting migratory game birds will not relieve the permittees of the requirements of the Migratory Bird Stamp Act, as amended.
- This INRMP is a Federal Facilities Compliance Agreement.
- As required by the Sikes Act, the following agreements are made:

- (1) This IAAAP INRMP is the planning document required by the Sikes Act, as amended. This plan contains those items specifically required by law. In the event the Sikes Act is

amended after this INRMP is signed, this plan will be amended to conform with new requirements within the Sikes Act, if needed.

- (2) This plan will be reviewed by IDNR, USFWS, and IAAAP on a regular basis, but not less often than every five years.
- (3) No land or forest products from land on IAAAP will be sold under Section 2665 (a) or (b) (address the sale of certain interests in land), Title 10 USC and no land will be leased on IAAAP under Section 2667 (addresses the leasing of non-excess property of military departments) of such Title 10 unless effects of such sales or leases are compatible with purposes of the INRMP.
- (4) With regard to the implementation and enforcement of the IAAAP INRMP, neither Office of Management and Budget Circular A-76 nor any successor circular thereto applies to the procurement of services that are necessary for that implementation and enforcement, and priority shall be given to the entering into of contracts for the procurement of such implementation and enforcement services with federal and state agencies having responsibility for the conservation or management of fish or wildlife.
- (5) The IAAAP INRMP is not, nor will be treated as, a cooperative agreement to which chapter 63 of title 31, United States Code applies.
- (6) This INRMP will become effective upon the date subscribed by the last signature and shall continue in full force for a period of five years or until terminated by written notice to the other parties by any of the parties signing this agreement. This agreement may be amended or revised by agreement between the parties hereto. Action to amend or revise may originate with any of the other participating agencies.

Appendix 3.4.1.1 Program Comment for World War II and Cold War Era (1939 -1974) Army Ammunition Production Facilities and Plants; and Program Comment for World War II and Cold War Era (1939 - 1974) Ammunition Storage Facilities



Preserving America's Heritage

**PROGRAM COMMENT FOR
WORLD WAR II AND COLD WAR ERA (1939 – 1974)
ARMY AMMUNITION PRODUCTION FACILITIES AND PLANTS**

I. Introduction

This Program Comment provides the Department of the Army (Army) with an alternative way to comply with its responsibilities under Section 106 of the National Historic Preservation Act with regard to the effect of the following management actions on World War II (WWII) and Cold War Era Army Ammunition Production Facilities and Plants that may be eligible for listing on the National Register of Historic Places (Facilities and Plants): ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.

In order to take into account the effects on Facilities and Plants, the Army will conduct documentation in accordance with The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation.

II. Treatment of Properties

A. Army Mitigation

1. The Army has an existing context study, Historic Context for the World War II Ordnance Department's Government-Owned Contractor-Operated (GOCO) Industrial Facilities 1939-1945 as well as documentation of nine World War II GOCO Plants.

2. The Army will prepare a supplemental volume that revises and expands the existing context to include the Cold War Era (1946-1974). The updated context study will:

focus on the changes that the plants underwent to address changing weapons technology and defense needs; and

identify prominent architect-engineer firms that may have designed architecturally significant buildings for Army Ammunition Plants.

3. The Army will prepare documentation that generally comports with the appropriate HABS/HAER standards for documentation for selected architecturally significant Facilities and Plants at two installations. This documentation will be similar to and follow the format of the existing documentation described in section II.A.1, above.

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4. Upon completion of the documentation, the Army will then make the existing documentation of the nine WWII GOCO Army Ammunition Plants and the WWII GOCO context and the new documentation, to the extent possible under security concerns, available in electronic format to Federal and State agencies that request it.

5. In addition, as a result of on-going consultations with stakeholders, the Army will provide a list of properties covered by the Program Comment, by state, to the National Conference of State Historic Preservation Officers and the Advisory Council on Historic Preservation.

6. The Army will also develop additional public information on the Army ammunition process, from production through storage, to include:

a display that can be loaned to one of the Army's museums, such as the Ordnance Museum at Aberdeen Proving Ground, or used at conferences; and

a popular publication on the ammunition process to accompany the display.

Copies of this information will be available electronically, to the extent possible under security concerns, and hard copies will be placed in a permanent repository, such as the Center for Military History.

7. The Army will encourage adaptive reuse of the properties as well as the use of historic tax credits by private developers under lease arrangements. The Army should also incorporate adaptive reuse and preservation principles into master planning documents and activities.

The above actions satisfy the Army's requirement to take into account the effects of the following management actions on Facilities and Plants: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance activities, new construction, demolition, deconstruction and salvage, remedial activities, and transfer, sale, lease and/or closure of such facilities.

III. Applicability

A. This Program Comment applies solely to Facilities and Plants. The Program Comment does not apply to the following properties that are listed, or eligible for listing, on the National Register of Historic Places: (1) archeological properties, (2) properties of traditional religious and cultural significance to federally recognized Indian tribes or Native Hawaiian organizations, and/or (3) Facilities and Plants listed or eligible National Register of Historic Places districts where the ammunition production facility is a contributing element of the district and the proposed undertaking has a potential to adversely affect such historic district. This third exclusion does not apply to ammunition production related historic districts that are entirely within the boundaries of an ammunition production plant. In those cases the Program Comment would be applicable to such districts.

B. An installation with an existing Section 106 agreement document that addresses Facilities and Plants can choose to:

1. continue to follow the stipulations in the existing agreement document for the remaining period of the agreement; or

2. seek to amend the existing agreement document to incorporate, in whole or in part, the terms of this Program Comment; or

3. terminate the existing agreement document and re-initiate consultation informed by this Program Comment, if necessary.

C. All future Section 106 agreement documents developed by Army installations related to undertakings and properties addressed in this Program Comment shall include appropriate provisions detailing whether and how the terms of the Program Comment apply to such undertakings.

IV. Completion Schedule

On or before 60 days following issuance of the Program Comment, the Army and ACHP will establish a schedule for completion of the treatments outlined above.

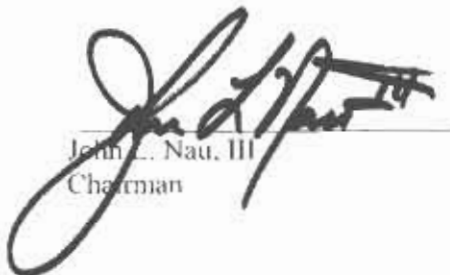
V. Effect of the Program Comment

By following this Program Comment, the Army has met its responsibilities for compliance under Section 106 regarding the effect of the following management actions on WWII and Cold War Era Army Ammunition Production Facilities and Plants that may be eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities. Accordingly, the Army will no longer be required to follow the case-by-case Section 106 review process for such effects.

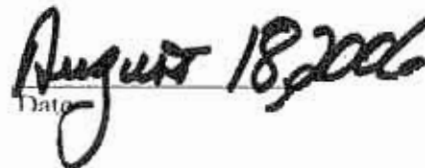
VI. Duration and Review of the Program Comment

This Program Comment will remain in effect until such time as Headquarters, Department of the Army determines that such comments are no longer needed and notifies ACHP in writing, or ACHP withdraws the comments in accordance with 36 CFR § 800.14(e)(6). Following such withdrawal, the Army would be required to comply with the requirements of 36 CFR §§ 800.3 through 800.7 regarding the effects under this Program Comments' scope.

Headquarters, Department of the Army and ACHP will review the implementation of the Program Comment seven years after its issuance and determine whether to take action to terminate the Program Comment as detailed in the preceding paragraph.



John L. Nau, III
Chairman



August 18, 2006
Date



Preserving America's Heritage

**PROGRAM COMMENT FOR
WORLD WAR II AND COLD WAR ERA (1939 – 1974)
AMMUNITION STORAGE FACILITIES**

I. Introduction

This Program Comment provides the Department of Defense (DoD) and its Military Departments with an alternative way to comply with their responsibilities under Section 106 of the National Historic Preservation Act with regard to the effect of the following management actions on World War II and Cold War Era ammunition storage facilities that may be eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.

The term Ammunition Storage Facilities means all buildings and structures, listed in or eligible for listing in the National Register of Historic Places, that were designed and built as ammunition storage facilities within the years 1939-1974, regardless of current use, and that are identified by a DoD Category Group (2 digit) code of 42, Ammunition Storage (category code 42XXXX), in the Military Service's Real Property Inventory currently or at the time of construction. Table 1 (attached) provides all such buildings and structures associated with ammunition storage, by Military Department, that are applicable to this program comment.

In order to take into account the effects on Ammunition Storage Facilities, DoD and its Military Departments will conduct documentation in accordance with The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. As each Military Department will be responsible for conducting its own mitigation actions, the following required documentation is structured by Military Department, followed by DoD-wide requirements.

II. Treatment of Properties

A. Army Mitigation

1. The Army shall expand and revise its existing context study, Army Ammunition and Explosives Storage in the United States, 1775-1945 to include the Cold War Era. This document provides background information and criteria for evaluating the historic significance of such buildings. The updated context study will:

identify the changes in ammunition storage during the Cold War;

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focus on the changes required for ammunition storage due to technological advancement in weaponry;

consider the importance of major builders, architects or engineers that may have been associated with design and construction of Ammunition Storage Facilities throughout the Army or at specific Army installations; and

describe the inventory of Ammunition Storage Facilities in detail, providing information on the various types of buildings and architectural styles and the quantity of each.

2. The Army shall undertake in-depth documentation on Ammunition Storage Facilities at nine installations. The existing context study concluded that the Army possessed “only a few basic types and an abundance of examples” of Ammunition Storage Facilities, due to the standardization of ammunition storage facilities beginning in the 1920s. The context study suggests that six geographically dispersed installations contain an array of primary examples of both aboveground and underground magazines with a high degree of integrity:

Hawthorne Army Depot, Nevada – early igloos;

McAlester Army Ammunition Plant, Oklahoma – Corbetta Beehive;

Pine Bluff Arsenal, Arkansas – biological and chemical igloos;

Ravenna Army Ammunition Plant, Ohio – standard World War II and aboveground magazines;

Blue Grass Army Ammunition Plant, Kentucky – standard World War II igloos and aboveground magazines; and

Louisiana Army Ammunition Plant, Louisiana – Stradley special weapons.

The Army shall document these six as well as three additional installations that possess Cold War Era Ammunition Storage Facilities. Documentation at the three additional installations will be determined after completion of the expanded context study described in section II.A.1., above. This study will include a brief history of the installation and the surrounding community, if appropriate, and a detailed history of the storage facilities and documentation of the buildings. The documentation will primarily consist of historic photographs and existing plans. Documentation will be tailored to address the different natures of aboveground and underground storage.

B. Navy Mitigation

1. The Navy will develop a supplemental context study that will be attached as an appendix to the Army’s existing context study, Army Ammunition and Explosives Storage in the United States, 1775-1945. The final product will be a separately bound volume of additional information and photographs and tabular appendices that, when presented with the Army’s and Air Force’s context studies, provide a clear picture of the Department of Defense’s Ammunition Storage facilities. This context study appendix will:

cover both World War II and the Cold War Era, from 1939-1974;

explore the changes in ammunition storage resulting from World War II;

examine the changes required for ammunition storage due to technological advancement in weaponry during the Cold War;

consider the importance of major builders, architects or engineers that may have been associated with design and construction of Ammunition Storage Facilities; and

describe the inventory of Ammunition Storage Facilities in detail, providing information on the various types of buildings and architectural styles and the quantity of each.

2. The Navy shall document a representative sample of the basic types of both aboveground and underground ammunition storage facilities. The Navy will choose three geographically dispersed installations with the greatest number and variety of such resources. The Marines will choose one such installation. The sample chosen shall be the best representative examples of the range of Ammunition Storage types constructed during World War II and the Cold War era. This documentation will include collecting existing plans and drawings, writing a historic description in narrative or outline format, and compiling existing historic photographs of the structures. Documentation will be tailored to address the different natures of aboveground and underground storage.

C. Air Force Mitigation

1. The Air Force will develop a supplemental context study that will be attached as an appendix to the Army's existing context study, Army Ammunition and Explosives Storage in the United States, 1775-1945. The final product will be a separately bound volume of additional information and photographs and tabular appendices that, when presented with the Army's and Navy's context studies, provide a clear picture of the Department of Defense's Ammunition Storage facilities. This context study appendix will:

cover the Cold War Era, from 1946-1974;

explore the changes in ammunition storage resulting from the Cold War;

examine the changes required for ammunition storage due to technological advancement in weaponry during the Cold War;

consider the importance of major builders, architects or engineers that may have been associated with design and construction of Ammunition Storage Facilities; and

describe the inventory of Ammunition Storage Facilities in detail, providing information on the various types of buildings and architectural styles and the quantity of each.

2. The Air Force shall document a representative sample of the basic types of both aboveground and underground ammunition storage facilities. The Air Force will choose three geographically dispersed installations with the greatest number and variety of such resources. The sample chosen shall be the best representative examples of the range of Ammunition Storage types constructed during the Cold War era. This documentation would include collecting existing plans and drawings, writing a historic description in narrative or outline format, and compiling existing historic photographs of the structures. Documentation will be tailored to address the different natures of aboveground and underground storage.

3. The Air Force will not be required to consider its World War II Era facilities in these mitigation actions. The Air Force was established in September 1947 and therefore was not associated with structures constructed during this era. Rather the Air Force has inherited its current inventory of 263 World War II Era Ammunition Storage facilities from former Army installations. Given the substantial

mitigation actions that will be undertaken by the Army to document its facilities, further documentation for the small number of similar facilities located at Air Force installations provides no additional historic value. While no documentation will be done on World War II facilities under the Air Force's control, all of the 263 facilities in its inventory are covered under this Program Comment.

D. DoD-Wide Mitigation

1. Copies of the documentation described above will be made available electronically, to the extent possible under security concerns, and hard copies will be placed in a permanent repository, such as the Center for Military History.
2. In addition, as a result of on-going consultations, each Military Department will provide a list of properties covered by the Program Comment, by State, to State Historic Preservation Officers, Tribal Historic Preservation Officers, and other interested parties, as appropriate. Each Military Department will be responsible for determining how to convey its information.
3. All Military Departments will encourage adaptive reuse of the properties as well as the use of historic tax credits by private developers under lease arrangements. Military Departments will also incorporate adaptive reuse and preservation principles into master planning documents and activities.

The above actions satisfy DoD's requirement to take into account the effects of the following management actions on World War II and Cold War Era ammunition storage facilities that may be eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.

III. Applicability

A. 1. This Program Comment applies solely to Ammunition Storage Facilities as defined in Section I, above. The Program Comment does not apply to the following properties that are listed, or eligible for listing, on the National Register of Historic Places: (1) archeological properties, (2) properties of traditional religious and cultural significance to federally recognized Indian tribes or Native Hawaiian organizations, and/or (3) ammunition storage facilities in listed or eligible National Register of Historic Places districts where the ammunition storage facility is a contributing element of the district and the proposed undertaking has the potential to adversely affect such historic district. This third exclusion does not apply to historic districts that are made up solely of ammunition storage facility properties. In those cases the Program Comment would be applicable to such districts.

Since the proposed mitigation for the Ammunition Storage facilities documents site plans, building designs, and the spatial arrangement of ammunition storage facilities, along with the events and actions that lead to the development of standardized ammunition storage facilities in DoD, the important aspects of ammunition storage, whether single buildings or districts made up entirely of ammunition storage, will be addressed regardless of the type of undertaking that may affect this particular property type. The one currently known ammunition storage district, at Hawthorne Army Ammunition Plant, has been identified for further study, as outlined in Section II(A)(2) above.

2. An installation with an existing Section 106 agreement document in place that addresses ammunition storage facilities can choose to:

- (i) continue to follow the stipulations in the existing agreement document for the remaining period of the agreement; or

(ii) seek to amend the existing agreement document to incorporate, in whole or in part, the terms of this Program Comment; or

(iii) terminate the existing agreement document, and re-initiate consultation informed by this Program Comment if necessary.

3. All future Section 106 agreement documents developed by the Military Departments related to the undertakings and properties addressed in this Program Comment shall include appropriate provisions detailing whether and how the terms of this Program Comment apply to such undertakings.

IV. Completion Schedule

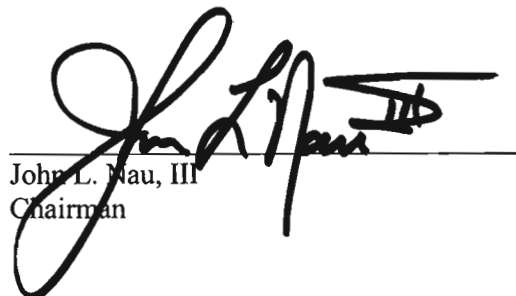
On or before 60 days following issuance of the Program Comment, DoD, its Military Department and ACHP will establish a schedule for completion of the treatments outlined above.

V. Effect of the Program Comment

By following this Program Comment, DoD and its Military Departments meet their responsibilities for compliance under Section 106 regarding the effect of the following management actions on World War II and Cold War Era ammunition storage facilities that may be eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities. Accordingly, DoD installations are no longer required to follow the case-by-case Section 106 review process for such effects. As each of the Military Departments is required under this Program Comment to document their own facilities, failure of any one Military Department to comply with the terms of the Program Comment will not adversely affect the other Departments' abilities to continue managing their properties under the Program Comment.

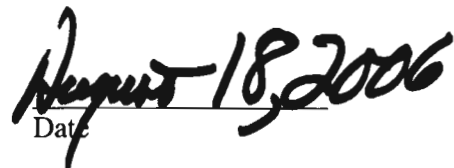
This Program Comment will remain in effect until such time as the Office of the Secretary of Defense determines that such comments are no longer needed and notifies ACHP in writing, or ACHP withdraws the comments in accordance with 36 CFR § 800.14(e)(6). Following such withdrawal, DoD and its Military Departments would be required to comply with the requirements of 36 CFR §§ 800.3 through 800.7 regarding the effects under this Program Comments' scope.

DoD, its Military Departments and ACHP will review the implementation of the Program Comment seven years after its issuance and determine whether to take action to terminate the Program Comment as detailed in the preceding paragraph.



John L. Mau, III
Chairman

Attachment: Table



August 18, 2006
Date

TABLE 1 - RPCS Hierarchy for Category Group 42

CG & Title	BC	BC Title	FAC	UM	FAC Title	MidDep	CAT CODE	UM AREA	UM OTH	UM ALT	CATCOD E LONG NAME
-42 - Ammunition Storage											
	421	Depot and Arsenal Ammunition Storage									
			4211	SF	Ammunition Storage, Depot and Arsenal						
						Army	42104	SF			EXPLOSIVE TRANSFER BUILDING, DEPOT LEVEL
						Army	42107	SF			STRADLEY, NONATOMIC BLAST RESISTANT, DEPOT LEVEL
						Army	42110	SF			FUSE AND DETONATOR MAGAZINE, DEPOT LEVEL
						Army	42120	SF			HIGH EXPLOSIVE MAGAZINE, DEPOT LEVEL
						Army	42150	SF			SMOKELESS POWDER MAGAZINE, DEPOT LEVEL
						Army	42160	SF			SPECIAL WEAPONS MAGAZINE, DEPOT LEVEL
						Army	42170	SF			GUIDED MISSILE MAGAZINE, DEPOT LEVEL
						Army	42180	SF			IGLOO STORAGE, DEPOT LEVEL
						Army	42181	SF			AMMUNITION STOREHOUSE, DEPOT LEVEL
						Army	42182	SF			SMALL ARMS AMMUNITION MAGAZINE, DEPOT LEVEL
						Army	42183	SF			GENERAL PURPOSE MAGAZINE, DEPOT LEVEL
						Army	42184	SF			AMMUNITION HUT, DEPOT LEVEL
						Army	42186	SF			AMMUNITION STORAGE STRUCTURE, DEPOT LEVEL
						Army	42288	SF			AMMO STORAGE OTHER THAN DEPOT OR UNIT
						Navy	42112	SF		CF	FUSE&DETONATOR MAGAZINE
						Navy	42122	SF		CF	HIGH-EXPLOSIVE MAGAZINE
						Navy	42132	SF		CF	INERT STOREHOUSE
						Navy	42142	SF		CF	SMOKEDRUM STOREHOUSE
						Navy	42148	SF		CF	SMALL-ARMS PYROTECHNIC MAGAZINE
						Navy	42152	SF		CF	SMOKELESS-POWDER-PROJECTILE MAGAZINE
						Navy	42162	SF		CF	SPECIAL-WEAPONS MAGAZINE
						Navy	42172	SF		CF	MISSILE MAGAZINE

4212 SF

SF

Installation and Ready Issue Ammunition Storage

Ammunition Storage, Installation

SF SF SF SF SF SF SF SF SF SF SF SF SF SF SF SF SF SF SF SF

423 Liquid Propellant Ammunition Storage	4231 GA		Liquid Propellant Storage, Ammunition Related	Navy	42135	SF	CF	READY MAGAZINE
424 Weapon-Related Battery Storage	4241 SF	Battery Storage, Weapon Related	Air Force	Army	423111		GA	LIQUID PROPELLANT AMMO STORAGE
					42310	SF	GA	LIQUID PROPELLANT STORAGE, AMMUNITION, BUILDING
					42311		GA	LIQUID PROPELLANT STORAGE, AMMUNITION, FACILITY
					42312	SF	GA	LIQUID PROPELLANT STORAGE, AMMUNITION, STRUCTURE
					42310		GA	LIQUID-PROPELLANT STORAGE
425 Open Ammunition Storage	4251 SY	Open Ammunition Storage	Army	Navy	42410	SF		BATTERY COLD STORAGE BUILDING
					42410	SF	SH	WEAPON-RELATED BATTERY STORAGE
					42510	SY		AMMUNITION STORAGE PAD
					42510	SY		OPEN-AMMUNITION-STORAGE PAD
			Navy	Navy	42520	SY		CONTAINER-HOLDING YARD -EMPTY
					42530	SY		BARRICADED MODULE (OPEN)

Appendix 4.3 Soil Erosion and Sediment Control Component

Background

Soils are the basis of sustainable natural resources and mission related activities, such as testing and construction. Erosion removes nutrient-rich soil needed for vigorous plant growth, increases rehabilitation costs, reduces water quality, produces fugitive dust and may create gullies that pose safety hazards. This appendix is a resource for the installation to use to identify potential erosion and sediment control issues and take appropriate measures to prevent or minimize the associated impacts.

AR 200-1 addresses environmental responsibilities of all Army organizations and agencies and indicates that the INRMP will be used for the planned management of soil resources across the entire installation. This Soil Erosion and Sediment Control Component to the INRMP addresses policy found in AR 200-1, para 4-3d (1) (s) and 3d (3).

Soil interpretations in the INRMP are based on information developed from the *Soil Survey of Des Moines County, Iowa* (Soil Conservation Service 1983) and soil type identification maps developed from soil testing of agricultural areas. The Des Moines County Survey was published by the US Department of Agriculture in cooperation with several other government agencies. The soil type identification maps developed from soil testing of agricultural areas were created in 2008, 2010, and 2011.

Erosion and Offsite Sediment Deposition

In general, most of the prairie soils are not considered highly erodible due to the soil structure and topography. However, many of the timber soils on IAAAP are or have the potential to be highly erodible due to their structure and topography. Most of the highly erodible lands within the Agricultural Program have been removed and converted to grasses, wildlife habitat, or forest. Soils policy in AR 200-1 require that soil erosion is kept within tolerance limits as defined in soil surveys prepared by the U.S. Department of Agriculture, Natural Resource Conservation Service. The soil loss tolerance limit is referred to as (T), which is the maximum rate of annual soil loss (tons/acre) that will sustain soil productivity on a given soil. Erosion is considered to be greater than T if either water erosion or wind erosion rates exceed the soil loss tolerance rate. The individual Agricultural Tract Management Plans and the associated Agricultural Land Use Regulation have conservation requirements for crop rotation, winter cover crops, tillage, and crop residue cover after planting that keep agricultural activities from exceeding T limits. Tile and terrace systems and grass waterways are also installed and maintained to further reduce soil erosion.

Erosion and Sedimentation Controls on Construction Sites

Soil surveys and maps are used in the pre-planning process to either locate physically intensive land disturbing activities on the least erodible soils or prepare for land rehabilitation measures. Preventing excessive soil erosion or off-site sediment deposition is the best option and can include controlling land uses, sequencing construction operations to periods of low erosion potential, and minimizing disturbed areas. Although the prevention option is the most desirable, it is not always feasible and land rehabilitation or conservation measures should be employed when erosion or off-site sediment deposition cannot be prevented.

Land rehabilitation or conservation measures are often referred to as Best Management Practices. An appropriate Best Management Practice is a practice or combination of practices that is selected as the most effective, economical, and practical means of preventing or reducing erosion or sedimentation to a level compatible with state and local water quality goals. Selecting an appropriate Best Management Practice will depend upon local site conditions (land use, topography, slope, water table elevation, and geology).

Soil policy in AR 200-1 requires that soil sediment, as a pollutant, is kept within compliance limits. Soil sediment as a pollutant is regulated through the National Pollutant Discharge Elimination System. IAAAP is permitted under the National Pollutant Discharge Elimination System General Permit for Discharges from Construction Activities. In addition to permitting requirements, content from these permits can be used for including climatic/seasonal changes in soil erosion as a factor in scheduling intensive mission operations and real property management activities. The table below briefly covers the Construction Permitting requirements on IAAAP.

Summary of IAAAP Construction Permitting Requirements

Area of Soil Disturbance	Regulatory Requirements
Less than 1 acre	Construction SWP3* and notice to state not required.
1 to less than 5 acres	Construction SWP3 is likely required though some short duration projects and may qualify for waiver. SWP3 or waiver request must be coordinated through Operations Support Division.
5 acres and greater	Construction SWP3 is required and must be coordinated through Operation Support Division. NOI* form and fee must be submitted to IDNR.

* SWP3 - Storm Water Pollution Prevention Plan. The document following IDNR approved format that details the project and efforts to prevent migration of pollutants from a construction site.

* NOI - Notice of Intent. The IDNR form that a construction site operator submits to the state in order to receive construction site permit coverage.

Appendix 4.8.1.1 Management Prescriptions and Implementation Portions of the Endangered Species Management Plan, Iowa Army Ammunition Plant, Iowa

Update/Revision Supplement to the Endangered Species Management Plan

Total Estimated Cost of Conservation Actions

The total estimated cost of conservation actions over the period 2018-2022 for the Endangered Species Management Plan is shown in Table 1. Table 2 provides a more detailed description of the time, costs, and personnel needed to implement each management prescription.

Table 1: Total Estimated Cost of Conservation Actions

Fiscal Year	Estimated Annual Cost
2018	\$8,700
2019	\$8,200
2020	\$8,200
2021	\$58,200
2022	\$9,200
5-Year Total	\$92,500

Table 2: Estimated Level of Effort and Cost by Management Prescription

Prescription Category	Annual Level of Effort (LOE) Required	Cost	Frequency
Future Forest Management	If future forest management prescriptions are employed at IAAAP they are not expected to require additional LOE. The only additional cost will be for the purchase of a bat detector for pre-dawn counts.	Approximately \$500	One-time cost
Agricultural Management	Agricultural management prescriptions will become part of IAAAP's existing agricultural management program and are not expected to require additional LOE.	\$0	NA
Construction, Demolition, and Environmental Remediation	Additional LOE will likely be required to conduct ESA Section 7 consultation for proposed construction, demolition, and environmental remediation activities. It is assumed that such consultation will be required once per year.	\$5,000	Annual average (as required)
Training Exercises	Prescriptions associated with training exercises are not expected to require additional LOE.	\$0	NA

Prescription Category	Annual Level of Effort (LOE) Required	Cost	Frequency
Hunting and Other Outdoor Recreation	Hunting and other outdoor recreation prescriptions are not expected to require LOE beyond that associated with routine natural resource management activities.	\$0	NA
Operating Contractor Activities	Additional LOE will likely be required to conduct ESA Section 7 consultation for tree removals by the operating contractor. It is assumed that such consultation will be required three times per year.	\$1,500	Annual average (as required)
Test Firing	Prescriptions associated with test firing are not expected to require additional LOE.	\$0	NA
Monitoring of Indiana and Northern Long-Eared Bats and Habitat	Conducting a mist net survey once every 5 years will require additional LOE and contractor costs.	\$50,000	Once every 5 years
	Long-term monitoring of summer habitat conditions will become part of IAAAP's existing forest management program and is not expected to require additional LOE.	\$0	NA
Implementation of Awareness Program	Additional LOE will be required for activities associated with this program, including reproducing and distributing a fact sheet; training supervisors and plant managers; and participating in mandatory safety briefings.	\$1,000	Annual
Communication with USFWS	Additional LOE will be required for activities associated with this task. It is assumed that such ESA Section 7 consultation will take place once per year.	\$200	Annual
ESMP Compliance and ESMP Review	Additional LOE will be required for IAAAP's natural resources manager to complete the ESMP annual compliance checklist and minor updates to the ESMP.	\$500	Annual
	Additional LOE will be required to complete major revisions to the ESMP.	\$1,000	Once every 5 years (or as required)

NA – Not Applicable

Appendix 4.10.1 Land Use Regulations, Iowa Army Ammunition Plant, Iowa

2017 AGRICULTURAL LAND USE REGULATIONS AND SPECIAL CONDITIONS IOWA ARMY AMMUNITION PLANT (IAAAP), MIDDLETOWN, IOWA

1. The lessee agrees to conduct all farming and grazing operations in accordance with the Land Use Regulations and Special Conditions set forth herein, and in accordance with the General Land Use Directives and the individual Tract Management Plan (Exhibit "C").
2. **VERBAL AGREEMENTS WILL NOT BE HONORED.** Any change in the Tract Management Plan, i.e., crop changes, maintenance requirements, etc., must be approved in writing by the Omaha District, Corps of Engineers, Real Estate Division, 1616 Capitol Avenue, Suite 9000, Omaha, Nebraska 68102-4901. Any such agreement will be finalized in writing in the form of a "supplemental agreement" to the lease or a letter from the Real Estate Contracting Officer.
3. Lease operations are to be carried on within the limits of the Army Ammunition Plant area. The access, use and occupation of the premises leased shall be subject to the general supervision and approval of the officer having immediate jurisdiction over the property and such rules and regulations regarding ingress, egress, safety, sanitation, and security as may be prescribed by the officer.
4. The Government maintains and uses utilities and facilities that are on or adjacent to the tract. The lessee will permit entry and performance of inspection(s) or maintenance as required.
5. The lessee will plant a **crop rotation** as specified in the Tract Management Plan. All listed crop rotations must be adhered to. To change the crop rotation the lessee will submit a written request for approval by the IAAAP Agronomist. The IAAAP Agronomist may recommend changes due to adverse environmental factors that prevent planting the scheduled crop or to reduce the impact of a major pest infestation. All changes must be documented and accepted by the Real Estate Contracting Officer through a supplemental agreement or letter, as stated in Paragraph No. 2. Payment details can be found in the body of the lease contract.

All leased land will be planted prior to **July 1st** each year. To renovate alfalfa, winter wheat may be planted with written approval from the IAAAP Agronomist. The lessee should plan to direct seed/plant **cover crops** the same day the row crop is harvested.

The Aerial application of seed is prohibited. Options to the listed cover crop types and establishment rates may be pre-approved in writing by the IAAAP Agronomist. For failure to establish a required cover crop, a \$60 per acre fee will be added to the next rental payment, as a condition of turn-in or as a condition of termination. **Fall tillage** of cover crops is prohibited without prior written approval from the IAAAP agronomist.
6. An annual fence inspection by the lessee on all grazing tracts is required. The lessee is responsible for **maintaining all fences** in the tract; except for the chain link fence(s). Prior to the turning in of livestock, the lessee will repair all required fences not in sufficient condition to contain or repel cattle. Any chain link fencing found not in sufficient condition to contain or repel cattle shall be reported to Guard headquarters upon discovery.

7. The lessee will request permission to place structures on any tract. The **location of structures** will not interfere with plant operations or be within thirty (30) feet of a chain link fence.

The lessee will supply all equipment needed to **water the cattle**. The Government does not guarantee the quality or quantity of water. The **grazing season** is from the first Saturday in May to the first Sunday in November each year. Gates will not be opened to give cattle access to ponds that are fenced. The lessee, at the request of the IAAAP Agronomist, will gather all the cattle on the leased tract for counting. Should the number of animal units on the tract be more than allowed in the lease tract management plan, the lessee will remove the **extra units** within two days and the grazing period on the lease shortened for that year using the following formula. The number of extra units times 2 equals the number of days to shorten the grazing period. An **animal unit** is one bull or a cow/calf. Feeder calves and bred heifers are three quarters of an animal unit.

8. The lessee will remove or lime **dead cattle** as soon as discovered. Cattle will not be buried on the installation. The lessee may be notified of livestock problems via telephone call or E-mail.

9. Only Environmental Protection Agency approved pesticides will be allowed. EPA approved **pesticides** may be banned from use on Government property during the lease period. Should the EPA ban the production of a pesticide but not its use, the use of that pesticide on the installation will be prohibited. Safety Data Sheets (SDSs) (formerly MSDSs or Material Safety Data Sheets) for pesticides being applied will be carried in the field during application.

Prior to **March 1st** of each year, the lessee will provide the IAAAP Agronomist a pesticide use proposal (PUP) on the form provided. Pesticides listed in the PUP will not be applied until approved for use. Annually, by **September 1st**, the lessee shall submit a **written report** to the IAAAP Agronomist, detailing all chemicals applied during the year. (See attached PUP and Annual Pesticide Application Report) On or about **September 1st**, access to the installation will be denied for lessees who's annual pesticide report has not been received.

The lessee shall assume full responsibility for applications of pesticides. Damage resulting from the use of pesticides by the lessee, either to the leased premises, adjacent property, and/or life shall be a lessee responsibility. Care will constantly be exercised in the mixing and usage of agricultural chemicals. Empty containers and excess material will be removed daily from the Installation.

- Pesticides with a high potential of carryover will not be used the last year of the lease.
- Pesticides will only be applied from a half-hour after sunrise to a half-hour prior to sunset.
- Pesticides will not be applied when wind the speed exceeds 10 miles per hour.
- The aerial application of any pesticide is prohibited.

10. In the case of any **chemical spill**, call Guard Headquarters immediately at (319) 753-7414 or 7912. The lessee will incur the cost of cleaning up the spill and any regulatory fines associated with the spill.

11. The leased tracts are subject to concurrent use for **recreational purposes**, including hunting, trapping and fishing, by such persons accorded the privilege by appropriate regulations established by the Installation Commander.
12. Lessee and employees, visitors, or other personnel will comply with all Installation **safety and security regulations** and will be required to clear through the Installation security office prior to being permitted access to the Installation.
13. The lessee will not enter any hazardous or explosive plant areas, including production lines and storage yards with vehicles equipped with catalytic converters. **Converter equipped vehicles** shall not be driven over or parked on a surface of easily combustible material such as straw, stalks, or dry grass.
14. It is understood and agreed that the Government is not responsible for and will not reimburse the lessee for any **crop damage** sustained due to wildlife, maintenance activities, or any installation operation activities.
15. **REDUCED TILLAGE:** After planting, no less than 25% of the ground will be covered by residue, except for the following reasons with IAAAP Agronomist approval: planting small grains or hay, grass waterway work, erosion repair, field tile and terrace work, testing of archeological sites and/or crop failure.
16. **CONSERVATION TILLAGE:** After planting, no less than 30% of the ground will be covered by residue, except for the following reasons with IAAAP Agronomist approval: planting small grains or hay, grass waterway work, erosion repair, field tile and terrace work, testing of archeological sites and/or crop failure.
17. **FALL TILLAGE:** Any vertical tillage deeper than 7" will only be allowed with the written approval from the IAAAP Agronomist. Light disking is approved for the planting of fall cover crops.
18. **NO TILLAGE:** As described and defined by the Natural Resources Conservation Service, except for the following reasons with IAAAP Agronomist approval: planting small grains, grass waterway work, erosion repair, field tile and terrace work, testing of archeological sites and/or crop failure.
19. The lessee will control noxious weeds. Noxious weeds will be controlled at or prior to the flowering stage. If the lessee fails to **control noxious weeds** within the lease tract and/or field borders, the Government, at its option, may have the noxious weeds controlled and the lessee shall immediately reimburse the Government for its incurred costs to control said noxious weeds.
20. The lessee will be responsible for costs to repair **damage to the installation, including signs and posts** caused by lessee activities. All tractors actively involved in mowing activities will be equipped with rollover protection.

- **Idle fields** will be mowed annually by the lessee by **August 1st**.

- **Grazing leases** will be mowed by August 1st of the first and third year of the lease period, unless stated otherwise in the individual Tract Management Plan.

The Government may mow for the lessee or terminate the lease if the lessee does not accomplish the **mowing requirements** in the lease. The present charge for mowing is about **\$50.00 per acre**. This is not a fixed price and the price can change at any time without notifying the lessee prior to mowing. The lessee shall immediately reimburse the Government for incurred mowing costs.

21. Lessees shall not plant row crops within the **security clear zones** of chain link fences. The clear zones are 30' from the inside and 15' from the outside of any chain link fence. Any crop within the clear zone may be mowed off at any time with the approval of the IAAAP Agronomist. Lessees that are found to have encroached upon a clear zone are required to re-establish grasses in those areas within 6 months. Lessees awarded new lease contracts will re-establish grasses in the clear zones during the spring of the first lease year to meet the distance requirements listed above.

22. The Government plans to take soil tests, apply **lime and fertilizer** with the exception of nitrogen. The lessee will apply nitrogen (N) per the recommendations in the soil test results. The lessee will not apply more than 150 units of N per acre. Soil test and fertilizer data is public information. The application of **Anhydrous Ammonia** is only permitted during the months of March through July, unless proven necessary otherwise by a history of stalk testing. With prior written approval from the IAAAP agronomist, on an experimental basis, a limited amount of anhydrous ammonia may be applied during the month of November in conjunction with **strip (Zone) tillage** for the specific purpose of creating a 6" wide seed bed in preparation of spring planting. No additional tillage will be performed prior to spring planting. The lessee will pay for any lime and fertilizer applied by the Government as part of the annual rental payment due March 1st. These costs are likely to fluctuate and will be provided to the lessee as soon as they are available. Payment details can be found in the body of the lease contract.

23. At no cost to the Government, the lessee will fix **Tile systems** with broken or missing tile intakes. The Government may require the lessee to repair up to two (2) tile blowout holes per tract per year, at the lessee's expense.

24. All new and/or existing **grass waterways** will not be sprayed with pesticides that could damage or kill the grass. All grass waterways will be left in sod if fields are cultivated. At the request of the IAAAP Agronomist, waterways will be created, removed, reseeded, mowed or changed as deemed necessary. Grass waterways will be maintained at least five (5) yards wide at the inlet and ten (10) yards wide at the outlet.

25. The Lessee will not **destroy native prairie or shelterbelt plantings**. If these plantings are damaged or destroyed, the Lessee will be required to re-establish the planting at no cost to the Government. The lessee will control noxious weeds in the shelterbelt plantings that may border this tract.

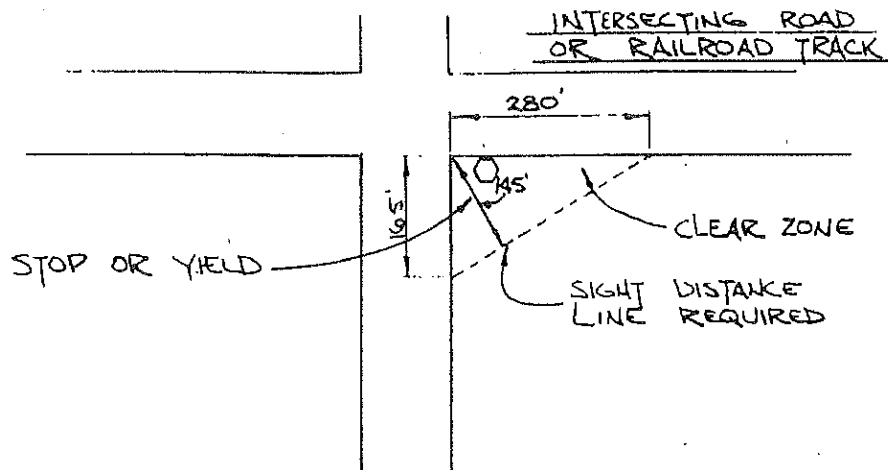
26. Crops will not be grown or tillage conducted within five (5) feet of the top of a back slope of a roadway ditch. The penalty for conducting a prohibited action listed above is **\$500 per Tract**.

27. All **hay bales** will be removed from the installation by **March 1st** each year.
28. All row and hay crops will be mechanically harvested. Corn, soybeans and winter wheat will not be chopped nor will the stalks, stubble, straw, residue or stover be baled/removed from the leased acres. The penalty for conducting a prohibited action listed above is **\$150 per acre**.
29. Reference is made to Sketch NO. 067061-16, "**Road Intersection - R.R. Grade Crossing Sight Requirements**", which is included as part of this regulation. The lessee will take whatever measures are deemed necessary by the Commanding Officer to maintain acceptable sight distance requirements at intersections.
30. **Grazing** is prohibited on tracts numbered under 100.
31. Lessees will not **store equipment** on the installation. However, the lessee may leave equipment overnight in times of busy operations (planting, harvesting, etc.). The lessee may also leave equipment if the ground is too wet to move the equipment. The lessee must remove the equipment as soon as the ground dries up sufficiently to allow movement of the equipment. Cattle gates, panels and watering tanks may be left on grazing tracts during the lease term.
32. **Fuel supply tanks** will only be parked in agricultural fields and parking lots not along roadways. Lessees are limited to a maximum of 500 gallons of supply fuel on post at any one time. All fuel supply tanks will be labeled with **DOT placards** 1993 or 1202 with fire symbol. **All tanks** shall be labeled with content and owner identification information.
33. **Annual rental payments** are due prior to **March 1st**. On or about **April 1st** access to the installation will be denied for lessees who's rental payment was not received by the U.S. Army Corps of Engineers prior to **April 1st**.
34. **ENVIRONMENTAL MANAGEMENT SYSTEM**

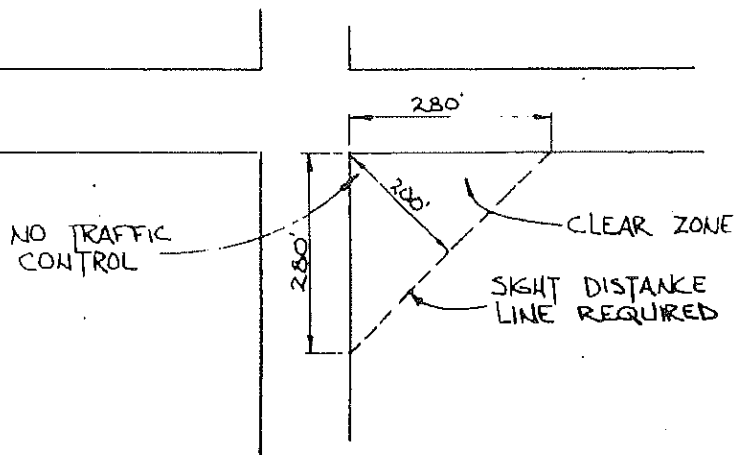
Iowa Amy Ammunition Plant is committed to a high standard of environmental stewardship, and has implemented the ISO 14001 Environmental Management System (EMS) encompassing all activities within the installation.

All employees, contractors, lessees, visitors and tenants are required to conduct themselves in an environmentally responsible manner, including, but not limited to, the requirements set forth in the Agricultural Leases.

IAAAP environmental staff reserves the right to inspect contractor, lessee, visitor, and tenant activities for conformance to the requirements of the ISO 14001 Environmental Management System and to determine appropriate corrective action in the event of a nonconformance. It is the contractor's, lessee's, visitor's or tenant's responsibility to remedy any identified nonconformance associated with their activities.



CONTROLLED INTERSECTION & R.R. GRADE CROSSING



UNCONTROLLED INTERSECTION

REV.	BY	DATE	DESCRIPTION	APPROVAL	DATE
IOWA ARMY AMMUNITION PLANT BURLINGTON, IOWA OPERATED BY MASON & HANGER SILAS MASON CO., INC. <i>mmh</i>			<u>ROAD INTERSECTION —</u> <u>R.R. GRADE CROSSING</u> <u>SIGHT REQUIREMENTS</u>	E.O. NO. <u>067061</u> W.O. NO. <u>---</u> DATE <u>5-10-73</u>	
DESIGN	DRAWN	APPROVAL			
DLP	J.R.P.	<i>mmh</i>	SKETCH NO. <u>067061-16</u>		

ANNUAL PESTICIDE USE PROPOSAL

Due By March 1st

NAME _____

ADDRESS _____

APPLICATOR (company/person) _____

PESTICIDE: Certification # _____ Category _____ Exp. Date _____

TRACT # _____ (One Tract per Form)

DATE _____

PESTICIDE COMMON NAME	FEDERAL EPA REGISTRATION NUMBER	TYPE OF CROP AND TARGET PEST

Complete this report annually and return by March 1st. Pesticides listed in this form will not be applied until approved for use. The point of contact is Mr. Joe Haffner, Phone 319-753-7903 or Email joseph.j.haffner.civ@mail.mil.

ANNUAL PESTICIDE APPLICATION REPORT

Due by September 1st

NAME _____

ADDRESS _____

APPLICATOR (company/person) _____

PESTICIDE: Certification # _____ Category _____ Exp. Date _____

TRACT # _____ (One Tract per Form) DATE _____

PESTICIDE COMMON NAME AND FEDERAL EPA REGISTRATION NUMBER	TYPE OF CROP AND NUMBER OF ACRES APPLIED TO	TOTAL AMOUNT OF PRODUCT APPLIED

Complete this report annually and return by September 1st. On or about **September 1st**, access to the installation will be denied for lessees who's annual pesticide report has not been received. The point of contact is Mr. Joe Haffner, Phone 319-753-7903 or Email joseph.j.haffner.civ@mail.mil.

Appendix 4.13.1.1 Integrated Wildland Fire Management Plan, Iowa Army Ammunition Plant, Iowa

This Iowa Army Ammunition Plant (IAAAP) Integrated Wildland Fire Management Plan uses guidance and format presented in the Army Integrated Wildland Fire Management Plan Template, with exceptions as needed for IAAAP conditions. It is intended to be an integral part of the Integrated Natural Resources Management Plan. This Integrated Wildland Fire Management Plan has been integrated with other environmental plans, particularly the Integrated Cultural Resources Management Plan.

1. Goals and Objectives

Goal. Provide wildland fire suppression support that prevents wildland fires from escaping IAAAP, minimizes damage to the environment, and ensures no threat to human life.

Objective 1. Provide a system that ensures timely notification of wildfires. Educating military personnel and civilians on prompt notification and proper information of wildfires is critical.

Objective 2. Use fire regulations to prevent wildfires from occurring.

Objective 3. Maintain fuel loads at levels appropriate for the prevention of major wildfires. Prescribed burns are conducted on some areas of IAAAP, primarily prairies areas. Regular burning promotes the native ecosystem, enhances prairies, and controls fuels in heavily vegetated areas resulting in lower intensity wildfires.

Objective 4. Comply with smoke management and air quality requirements regarding wildland fires.

Objective 5. Cooperate with IAAAP and other agencies for wildland fire management.

Objective 6. Provide for firefighter and public safety with regard to wildland fire management.

Objective 7. Use wildland fire management to support the military mission on IAAAP.

Objective 8. Ensure wildland fire management is consistent with objectives of natural and cultural resources management and their compliance requirements on IAAAP.

Objective 9. Identify funding requirements for implementation of this Integrated Wildland Fire Management Plan.

2. Organizational Structure and Responsibilities

The IAAAP Fire Department is responsible for fire protection and suppression on the Plant. The Natural Resources Manager is responsible for planning prescribed burns and supports the Fire Department as necessary with regard to annual prescribed burns and wildfires on IAAAP.

Ammunition production and storage facilities on IAAAP provide additional challenges to wildfire suppression and prescribed burning. Fire Department personnel respond to wildfires; if assistance is required, the Natural Resources Manager may be contacted.

If the Natural Resources Manager happens to be the first to arrive on the scene of a wildfire, he will serve as Incident Commander on that fire until superseded by a more qualified individual. The Incident Commander communicates to the appropriate organization the precise location and intensity of the fire and whether additional equipment and personnel are needed. Decisions on suppression techniques will be made by the Incident Commander.

3. Interagency Cooperation and Mutual Aid Agreements

IAAAP has established mutual aid agreements with Burlington, West Burlington, and Danville Fire Departments.

4. Smoke Management and Air Quality

Smoke management and air quality are integral parts of each prescribed burn and the annual Prescribed Burn Plan prepared by IAAAP. The Prescribed Burn Plan includes site specific characteristics to be considered for prescribed burning.

5. Safety and Emergency Operations

The on-site Incident Commander will ensure all safety precautions are taken. Except in the event of a threat to human life, no wildfire situation will require placing a firefighter or equipment in extreme danger. All efforts are to be made that military and civilian personnel are not in any danger from the wildfire. Firefighters must wear all necessary protective equipment.

Prescribed burning will not be done in ammunition storage areas (igloo areas) unless igloos are empty, or experimental burns on igloos indicate the potential danger of such action is minimal, and the appropriate authorization is acquired. Creeks, firebreaks, and roads will be used to contain wildfires and prescribed burns. Backfires will also be used to prevent wildfires from escaping and for prescribed burns.

6. Risk Assessment Decision Analysis Processes

The Fire Chief will review the Fire Weather issued by the National Weather Service. Prescribed burning normally will not be conducted if any one of the following circumstances exist:

- a wind speed outside of the 5-10 miles per hour range,
- a relative humidity outside of the 25-45% range,
- a fuel moisture outside of the 8-12% range,
- an atmosphere with eminent storm fronts, and
- inadequate personnel or equipment available to manage the prescribed burn.

However, the Fire Chief may decide to perform prescribed burning operations outside of the above stated parameters based on the location of the planned burn, conditions of the area to be burned, conditions of the surrounding areas, desired results, etc. Natural Resources concurrence must be obtained regarding such decisions.

7. Wildland Fire History

The IAAAP Natural Resources Manager maintains a file of wildland fire incidents and prescribed fires on the Plant.

8. Natural and Cultural Resource Considerations

Areas with potential cultural resources and natural resources sensitive areas are known and protected. Personnel will avoid these areas when maintaining and constructing firebreaks or any other soil-disturbing activities. Prescribed burning that may affect potential Indiana bat (*Myotis sodalis*) and northern long-eared

bat (*Myotis septentrionalis*) summer habitat is restricted to the period outside the summer maternity dates of April 15 - September 15.

Regular prescribed burning benefits the prairie ecosystem by removing midstory, allowing native vegetation to proliferate. It also controls invasive species, such as eastern red cedar (*Juniperus virginiana*).

9. Mission Considerations

IAAAP provides facilities for the production and storage of ammunition and a range of military training opportunities. Downtime for production, storage operations, or training from wildfires is not desirable. This plan provides for timely wildfire response with minimal impact to these activities. The prescribed burn program allows for good vegetation management, invasive species control, and less intense wildfires.

10. Wildland Fuel Factors

IAAAP's prescribed burn cycle minimizes the excessive build-up of fuel loads. Areas with high fuel loads should be burned on a regular cycle, perhaps even annually, depending on such factors as location of the burn, conditions of the area to be burned, conditions of areas surrounding the planned burn, desired results, etc. From 20 to 50 acres are planned for prescribe burning annually.

11. Monitoring Requirements

Each wildfire and prescribed burn produces a different set of monitoring requirements. Several factors affect monitoring required, such as size, location, weather, mission operations, safety, fire behavior, and resources available. Fires are evaluated by the Natural Resources Manager. Evaluations are used to determine the extent of damage to resources in the case of wildfire. Prescribed burns are evaluated to determine if objectives were attained and to ensure desired results in future burns.

12. Public Relations

Interaction with the public is performed by the Public Affairs Officer or the Fire Chief. If a wildfire situation requires public notification, the information will be forwarded to the Commander. The Commander will be informed of all wildfires.

13. Funding Requirements

Funding for wildfire suppression and for prescribed burns will be directly supported by the Plant through the operating contractor and through Agricultural Reimbursable Account funds for vegetation management-related prescribed burns.

14. Personnel Training and Certification Standards and Records

Records of training and experience for IAAAP Natural Resources personnel will be maintained by the Natural Resources Manager. Records of training and experience for IAAAP Fire Department personnel will be maintained by the Fire Department. Records will be periodically reviewed to ensure personnel are current in all aspects of training requirements.

15. Physical Fitness Standards

The physical fitness standards for prescribed burning and wildfire suppression performed by the Fire Department are met through regular training, which includes meeting a standard of physical fitness.

Staffing Requirements

Required staffing necessary for wildland fire management is the current Fire Department staff plus the Natural Resources Manager for prescribed burning. These positions are necessary to provide adequate protection to military and civilian personnel and natural resources on IAAAP.

Training Requirements

IAAAP will provide a means for each employee to maintain training levels and encourage use of new technology through Internet access and personal contacts. The Natural Resources Manager and the Fire Chief will explore new equipment ideas and remain open-minded regarding their procurement and use.

Appendix 7.4 List of INRMP Goals and Objectives

The below list of **projects** with their *goals* and objectives is presented in the order they appear in this INRMP. Goals and objectives are summarized; their full terminology is within Chapters 4, 5, and 7.

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
4.2.1.2	Ecosystem Management Coordination and Planning						
	<i>1. Use coordinated planning to manage natural resources to sustain military mission capability.</i>						
	1. Coordinate natural resources planning with planning for the sustainment of the military mission.	X					
	2. Adhere to the IAAAP Land Use Control Procedures to ensure natural resources are thoroughly considered in the project planning process.	X					
	<i>2. Promote and participate in regional planning for natural resources conservation at scales larger than IAAAP.</i>						
	3. Coordinate with and support regional planning and programs.	X					
4.2.2.2	Integrated Natural Resources Management Planning						
	<i>Use coordinated planning to fully integrate the natural resources program at IAAAP.</i>						
	1. Internally review this INRMP annually using project goals and objectives to guide reviews; revise projects and budgets as required; review changes with the USFWS and IDNR as appropriate and necessary.	X					
	2. Review and, if needed, update the INRMP at least every five years or when major changes are made to the natural resources program; coordinate this update with the USFWS and IDNR.						X
4.3.2	Soils Management						
	<i>Repair damaged soils and use soil parameters to manage military activities, protect soil stability, restore installation lands, and conserve wildlife habitat.</i>						
	1. Assess effectiveness of aerial seeding of cover crops and expand program if appropriate.	X					
	2. Use improvement of vegetative cover and contour farming to prevent soil erosion.	X					
	3. Ensure that roads are maintained and upgraded as necessary.	X					

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
	4. Consider soils management in implementation of the agricultural grazing program.	X					
	5. Use soil inventory data to make decisions regarding land use, rehabilitation options, and wildlife habitat management options.	X					
	6. Use the Soil Erosion and Sediment Control Component document to identify potential erosion and sediment control issues and take appropriate measures to prevent or minimize the associated impacts.	X					
4.4.2	Water Resources Management						
	<i>Protect surface water quality at IAAAP.</i>						
	1. Use water quality data to make decisions regarding land use, restoration options, and fish and wildlife habitat management options.	X					
	2. Control or eliminate runoff and erosion that could affect surface waters.	X					
	3. Consider nonpoint source pollution abatement in construction, operations, and land management plans and activities.	X					
4.5.2	Forest Management						
	<i>Manage the forest ecosystem to support the military mission and maintain ecosystem integrity.</i>						
	1. Use ecosystem-focused management with emphasis on the military mission, enhancement of ecosystem integrity, protection of watersheds, management of wildlife habitat, and provisions for outdoor recreation.	X					
	2. Implement forest management prescriptions (Stantec 2015) to preserve habitat for the Indiana and northern long-eared bat on IAAAP.	X					
	3. Ensure that natural resources personnel are as free as possible of commercial influence to accomplish landscape management, compliance, and stewardship.	X					
	4. Plant trees as necessary to mitigate projects that damage or remove wildlife habitat and to enhance existing wildlife habitat.	X					
	5. Consider the issue of deer damage when using tree planting as a forestry technique.	X					
4.6.2	Habitat Management						
	<i>1. Monitor vegetative communities that are indicators of ecosystem integrity, capability of lands to support military missions, status of</i>						

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
	<i>sensitive species or communities, and other special interests.</i>						
	1. Update the flora inventory as new species are found through field observations, site-specific surveys, sensitive plant species surveys, and other projects.	X					
	2. If plants that are federally-listed are found on IAAAP, develop an inventory/monitoring program for these species.	X					
	3. Periodically update a vegetation map for IAAAP.	X					
	2. Manage wetlands to ensure “no net loss” per Executive Order 11990.						
	4. Maintain a database on wetland resources at IAAAP.	X					
	5. Use site-specific surveys to evaluate wetland resources if potential wetland impacts are proposed.	X					
	6. Use the environmental review process to protect wetlands.	X					
	7. Provide certified jurisdictional wetland delineations (and permit application, if necessary) if a project is planned in a suspected wetland.	X					
	8. Maintain wetlands quality through active management (e.g., prescribed burning), if necessary.	X					
	3. Manage wildlife species habitats based on conservation needs, distribution and threats, population trends, importance of areas to species, potential for population and/or habitat management, and human interests.						
	9. Maintain terrestrial habitats, primarily through the agricultural outlease program.	X					
	10. Manage native prairie areas through appropriate grazing management, reintroduction efforts, clearing woody vegetation, and prescribed burning.	X					
	11. Concentrate native prairie restoration efforts on smaller tracts that may be problematic to farm.	X					
	12. Control invasive species, such as eastern red cedar and multiflora rose, using integrated pest management techniques.	X					
	13. Continue the Bluebird nest box program at IAAAP using volunteers to construct and maintain the boxes.	X					
	4. Maintain and enhance the natural diversity of aquatic communities on IAAAP.						

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
	14. Manage Mathes Lake to support a greater variety of fish and the five other primary impoundments on IAAAP for bluegill, redear, bass, white crappie, and channel and flathead catfish.	X					
	15. Use land use control procedures to manage the small, shallow ponds on IAAAP for amphibian habitat.	X					
	16. Add rip-rap to the Mathes Lake spillway to form a fish barrier.	X					
	17. Install fish structure on an opportunistic basis.	X					
4.7.2	Fish and Wildlife Management						
	<i>1. Regularly monitor species that are indicators of ecosystem integrity and other special interests.</i>						
	1. Perform white-tailed deer data collection through reporting requirements at installation gates.	X					
	2. Perform wild turkey data collection through reporting requirements at installation gates.	X					
	3. Perform small game and fish population data collection through reporting requirements at installation gates.	X					
	4. Monitor other species through incidental observations for abundance and general health.	X					
	<i>2. Maintain fish and wildlife populations at optimal levels in accordance with species priorities, population ecology, population health considerations, and habitat capacities.</i>						
	5. Use established hunting seasons, procedures, methods, etc. to maintain white-tailed deer and turkey populations at or slightly below carrying capacities.	X					
	6. Maintain small game and furbearers within habitat carrying capacities.	X					
	7. Manage fisheries resources to maintain a harvestable surplus and use recreational harvest to manage game fish populations.	X					
	8. Stock fish to support recreational fishing use as funding allows.	X					
	9. Investigate options and/or regional facilities (commercial operations) to procure fish for stocking.	X					
	10. Consider neotropical migrants and nearctic grassland and forest dwelling birds in grassland and forest habitat management.	X					

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
	11. Protect small and shallow water areas as reptile and amphibian habitats; ensure ample cover and resources exist for snakes, lizards, and land turtles to satisfy food and cover requirements; and educate installation personnel on benefits of reptiles, especially snakes.	X					
	12. Investigate the feasibility of additional surveys for nongame birds and reptiles and amphibians on IAAAP with emphasis on species of concern as funding, personnel, and time allows.	X					
4.8.1.2	Federally-listed Species Management						
	<i>At a minimum, sustain residential populations of endangered, threatened, or special status species and their habitats at current levels, with the long-term goal of conserving listed species and their habitats in accord with specific Recovery Plans and the ESA.</i>						
	1. Implement requirements of the ESA, as stated by AR 200-1.	X					
	2. Implement Indiana and northern long-eared bat management prescriptions specified in the ESMP (Stantec 2015).	X					
	3. Update the IAAAP Endangered Species Management Plan.	X	X				
	4. Survey for other federally-listed species as funding permits.	X					
	5. If species other than the Indiana and northern long-eared bat that are federally-listed are discovered on IAAAP or if species already known on the Plant become federally-listed, consult with the USFWS and develop an inventory/monitoring program and management plan for these species.	X					
4.8.2.2	Nonfederally-listed Species Management						
	<i>Monitor and manage nonfederally-listed, special status plant and animal species on IAAAP to the degree possible with available staffing and funding.</i>						
	1. Consider state-listed and Birds of Conservation Concern species in all IAAAP actions.	X					
	2. Whenever possible, use actions designed for federally-listed species to protect or manage other sensitive species.	X					
	3. Resurvey last known locations and areas of similar habitat of state threatened, endangered, or	X					

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
	species of concern, and/or species that may be listed in the near future.						
4.10.2	Agricultural Outlease Management						
	<i>Provide opportunities for agricultural use of IAAAP when consistent with the military mission and native ecosystem functionality.</i>						
	1. Update the Agricultural Land Use Regulations and individual tract management plans as needed to manage grazing, hay, and crop production activities on IAAAP.	X					
	2. Ensure that requirements of the Agricultural Land Use Regulations and individual tract management plans are followed.	X					
	3. Continue to apply fertilizer and lime to agricultural crop areas through a contract.	X					
	4. Repair or replace tile drainage systems as necessary.	X					
	5. Harden or otherwise improve access roads for agricultural and recreational purposes.	X					
	6. Manage and protect land resources on IAAAP while maximizing land use and providing an economic resource to the natural resources program through agricultural outleases.	X					
	7. Include planning and NEPA analysis in agricultural outlease decisions.	X					
4.11.2	Pest Management Support						
	<i>Control plant and animal species that affect natural resources management (e.g., reduce ecosystem functionality, displace native species) or directly affect the military mission on IAAAP.</i>						
	1. Maintain an updated Integrated Pest Management Plan on a five-year cycle.	X					
	2. Emphasize integrated pest management techniques to reduce the use of pesticides.	X					
	3. Ensure pesticide applicators are fully certified, including sending the Natural Resources Manager to the Pest Management Quality Assurance Evaluator course.	X					
	4. Control nuisance wildlife as needed to protect facilities and infrastructure and to support the military mission.	X					
	5. Prevent the introduction of and control invasive species, per Executive Order 13112, <i>Invasive Species</i> .	X					

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
4.13.2	Fire Management						
	<i>Prevent and suppress wildfires; utilize prescribed burning to sustain or enhance mission capabilities and maintain ecosystem biodiversity and functionality.</i>						
	1. Provide natural resources management-related recommendations relative to fire suppression activities and provide support as needed to the IAAAP Fire Department.	X					
	2. Update and refine the <i>Integrated Wildland Fire Management Plan</i> (Appendix 4.13.1.1) as necessary.	X					
	3. Use prescribed burning to maintain the military mission and enhance IAAAP ecosystems.	X					
	4. Provide the Fire Department a map of areas to be burned each year.	X					
	5. Maintain firebreaks and roads to provide for quick access for fire management and facilitate an effective prescribed burning program.	X					
4.14.2.2	Hunting, Trapping, and Fishing Programs						
	<i>Provide opportunities to the IAAAP community and general public for quality, safe, and equitable hunting, trapping, and fishing, consistent with needs of the IAAAP military mission.</i>						
	1. Follow IDNR season, bag limit, and other regulatory instruments for hunting, trapping, and fishing, with exceptions for management or safety purposes.	X					
	2. Continue recreation control systems to ensure safe conditions and equitable treatment of users.	X					
	3. Update recreation rules and regulations as needed.	X					
	4. Continue to provide hunting, trapping, and fishing permits on the Plant.	X					
	5. Periodically evaluate the IAAAP recreational user fee schedule.	X					
	6. Ensure IAAAP recreationists follow state and Plant safety requirements.	X					
5.1.2	Natural Resources Enforcement						
	<i>Assure legal compliance of military and civilian activities with regard to natural resources on IAAAP.</i>						
	1. Maintain a law enforcement program for military and civilian activities that relates to natural resources protection on IAAAP.	X					

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
	2. Coordinate enforcement activities with other agencies, particularly IDNR and USFWS as necessary.	X					
	3. Work with Security Officers to lessen hunter contact tensions, and ensure Security personnel understand recreational user responsibilities on IAAAP.	X					
5.2.2	Conservation Awareness						
	<i>Provide information to IAAAP and external interested communities regarding natural resources and associated management programs at IAAAP.</i>						
	1. Improve the general knowledge of all persons associated with the natural resources program, particularly those who come into regular contact with interested persons.	X					
	2. Use the installation web page, facebook page, and the American Ordnance LLC email kiosk system to keep the IAAAP community informed.	X					
	3. Encourage youth to participate in the natural resources program, whenever possible.	X					
5.3.2	Cultural Resources Protection						
	<i>1. Implement this INRMP in a manner consistent with the protection of cultural resources at IAAAP.</i>						
	<i>2. Comply with all laws, regulations, and Army guidance regarding cultural resources on IAAAP.</i>						
	1. Update the Cultural Resources Management Plan.	X					
	2. Implement provisions of the Cultural Resources Management Plan that relate to natural resources management.	X					
	3. Consider natural resources projects when planning cultural resources surveys and use results of cultural resources surveys to plan natural resources projects.	X					
	4. Avoid or mitigate adverse effects to cultural resources from natural resources through proper review and planning; submit proposed projects, as part of NEPA review, for approval, determinations of effect, and Section 106 consultation, as necessary.	X					
	5. Take appropriate protective measures upon discovery of sites.	X					
	6. Use natural resources techniques and projects to protect cultural resources sites.	X					
	7. Install physical barriers (fencing and signage) for sensitive areas, such as known cultural resource sites	X					

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
	but also for unexploded ordnance areas, as necessary.						
5.4.2.2	Use of NEPA						
	<i>1. Use NEPA to identify projects and activities on IAAAP that might impact natural resources and work with project planners to resolve issues early in the planning process.</i>						
	<i>2. Use NEPA to ensure this INRMP is documented according to the spirit and letter of NEPA.</i>						
	<i>3. Help IAAAP comply with NEPA.</i>						
	1. Document effects of implementation of this INRMP through an incorporated EA.		X				
	2. Reference this INRMP/Categorical Exclusion in descriptions of affected environment to reduce verbiage in other NEPA documents.	X					
	3. Classify mitigation as a “must fund” for budgetary purposes.	X					
7.2.1.2	INRMP Implementation Staffing and Training						
	<i>1. Provide staffing of natural resource management professionals required to effectively manage natural resources on IAAAP (Department of Army 2007).</i>						
	1. Provide staffing for the IAAAP natural resources program to effectively implement this INRMP.	X					
	<i>2. Provide training to natural resources personnel implementing this INRMP.</i>						
	2. Encourage natural resources personnel to join professional societies and their state/regional chapters as well as be active in them.	X					
	3. Send at least one person to each of the annual workshops or professional conferences discussed above.	X					
	4. Evaluate other conferences/workshops for their usefulness as training tools, and send personnel to those most justified, based on current training needs and those most related to IAAAP activities.	X					
	5. Ensure that natural resources personnel obtain the one-time or occasional refresher training needed to fulfill job requirements (e.g., pest management, NEPA training, endangered species documentation/consultation training, wetland permitting, MBTA).	X					
	6. Actively participate in training sessions to disseminate knowledge learned at IAAAP.	X					

Section	Projects/Goals/Objectives*	Implementation Year					
		Ongoing/ As Needed**	18	19	20	21	22
7.2.2.2	External Assistance						
	<i>Provide external specialized skills, personnel, and resources to support the IAAAP natural resources program.</i>						
	1. Implement external support projects, which are described in more detail in appropriate sections of this INRMP.	X					
	2. Use county, state and federal agencies, particularly INRMP signatory partners, the USFWS and IDNR, to assist with implementation of this INRMP.	X					
	3. Use universities and contractors to assist with implementation of this INRMP.	X					
7.3.2	Data Storage, Retrieval, and Analysis						
	<i>Store, analyze, and use data in an efficient, cost-effective manner.</i>						
	1. Upgrade microcomputer hardware and software as needed during the next five years.	X					
	2. Develop or obtain databases needed to support the IAAAP natural resources program.	X					
	3. Use remote imagery for improved decision-making for military activities, environmental management, and natural resources management and protection.	X					

* Project title (in **bold**) follows section number; goal(s) appear in ***bold/italics***; objectives are numbered consecutively following goals. Both goals and objectives are condensed from chapters 4-7.

** In some cases, designates uncertain.

Appendix 8.5.2 Finding of No Significant Impact (2013)

FINDING OF NO SIGNIFICANT IMPACT
INTEGRATED NATURAL RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL ASSESSMENT
IOWA ARMY AMMUNITION PLANT

1. **Description of Action.** The Iowa Army Ammunition Plant, Middletown, Iowa proposes to implement an Integrated Natural Resource Management Plan for the period 2013-2018 to manage natural resources, support the military mission, and comply with various environmental laws.

Implementation would be ongoing operations over the five-year period using both in-house and external personnel. The primary thrust of the program would be to survey and monitor natural resources and implement programs to conserve and manage them in a proactive manner, complying with environmental laws and regulations.

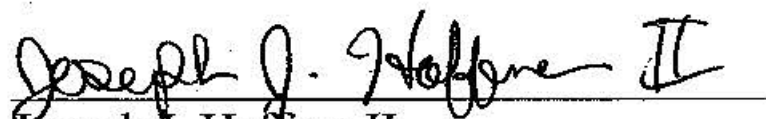
2. **Anticipated Environmental Effects.** Any minor, negative impacts of implementation of the Integrated Natural Resources Management Plan would be more than offset by positive impacts of implementing this plan. No adverse impact is expected to occur to any federal-listed threatened or endangered plant or animal species.

No significant adverse impacts are anticipated for noise, air quality, geology, soils, water resources, biological resources, cultural resources, socio-economics, or environmental justice. This proposed action would either not impact or positively impact these resources.

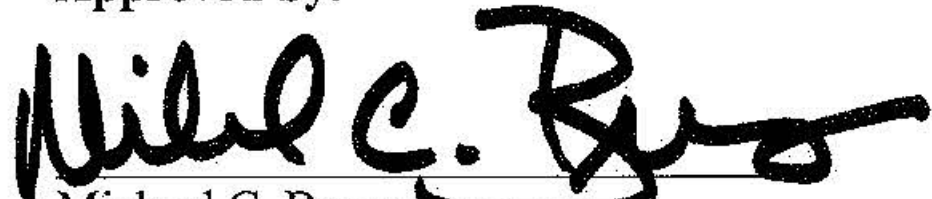
3. **Conclusions.** Based on a review of the information contained in environmental assessment portions of the Integrated Natural Resources Management Plan, it is concluded that implementation of the Iowa Army Ammunition Plant Integrated Natural Resources Management Plan is not a major federal action that would significantly affect the quality of the environment within the meaning of Section 102(2)(c) of the National Environmental Policy Act of 1969, as amended. Accordingly, the preparation of an Environmental Impact Statement for this proposed action is not required.
4. **Point of Contact.** Requests for further information or submittal of public comments may be made for 30 days after first publication date to:

Commander, Iowa Army Ammunition Plant
ATTN: Annette Parchert
Public Affairs Officer
Iowa Army Ammunition Plant, JMIA-AA
17571 Hwy 79, Middletown, IA 52638
Phone: 319-753-7001

Submitted by:


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