



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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MAR 04 2008



William Conrad, Secretary
BCCP Coordinating Committee
625 East 10th Street
Austin, Texas 78701

Dear Mr. Conrad:

We have reviewed the revised Balcones Canyonlands Preserve Land Management Plans. The plans are extremely well written, comprehensive, and are in compliance with the approved Land Management Guidelines. We offer the following specific comments:

Tier II-A, Chapter IX - Karst Species Management.

1. Page 5 - *Cicurina cueva* is not a candidate for listing under the Endangered Species Act. It should be referred to as a species of concern.
2. Pages 15-16 - The discussion refers to 164 feet as the minimum cave cricket foraging distance from cave entrances and allows the use of chemical baits to treat imported red fire ants beyond that distance. Cave crickets are a critical source of nutrient input for karst ecosystems and the rare species they support (Barr 1968, Reddell 1993) and occur in most caves in Texas (Reddell 1966). Due to their contribution to the karst ecosystem, cave crickets and their surface foraging ranges surrounding a cave are important to the conservation of karst invertebrates that inhabit the cave. Recent studies indicate that cave crickets forage out to at least 334 feet (Taylor et al. 2005). This section should be revised to increase the cave cricket foraging distance to 334 feet from the cave opening. Chemical baits should not be used closer than this distance to cave entrances to avoid impacts to cave crickets and rare karst invertebrates.

Tier II-A, Chapter X - Animal Management

1. Pages 23-26 - Comment 2 above also applies to this discussion on fire ant control. Please revise this section to reflect that chemical baits should not be used within the cave cricket foraging area of occupied karst features to avoid impacts to the crickets and the karst ecosystems which they inhabit.

With these revisions, we approve the Land Management Plans except Tier II, Chapter 12. We look forward to working with you and with other BCP Partners to complete this chapter.

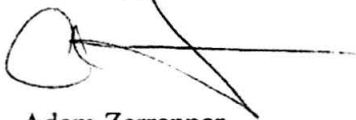
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William Conrad

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Thank you for your continued dedication to protecting natural resources on BCP lands. If you have questions, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Zerrenner', with a long horizontal stroke extending to the right.

Adam Zerrenner
Field Supervisor

cc: Mayor Will Wynn, Chair BCCP Coordinating Committee
Commissioner Gerald Daugherty, Member BCCP Coordinating Committee
Rose Farmer, Program Manager, Travis County Transportation and Natural Resources
Rusty Ray, Lower Colorado River Authority, Conservation Services
Scott Rowin, BCP Program Manager, Austin Water Utility
Ted Siff, Chair, BCCP Citizens Advisory Committee
David Steed, BCCP Citizens Advisory Committee

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References

- Barr, T.C. 1968. Cave ecology and the evolution of troglobites. *Evolutionary Biology* 2: 35-102.
- Reddell, J.R. 1966. A checklist of cave fauna of Texas. II. Insecta. *Texas Journal of Science* 18: 25-56.
- Reddell, J.R. 1993. Response to the petition to delist seven endangered karst invertebrates. Unpublished report to U.S. Fish and Wildlife Service, Austin, Texas. 10 July 1993. 24 pp.
- Taylor, S.J., Krejca, J.K., and M.L. Denight. 2005. Foraging range and habitat use of *Ceuthophilus secretus* (Orthoptera: Rhaphidophoridae), a key troglodite in Central Texas cave communities. *American Midland Naturalist*. 154: 97-114.