



# ECS Southwest, LLP

Special-Status Species Assessment

REDI Arkansas Manufacturing Center  
US 67 and Miller County Road 64  
Texarkana, Arkansas 71854

For: AR-TX Redi  
2900 Saint Michael Drive  
5<sup>th</sup> Floor  
Texarkana, Texas 75503

ECS Project No. 51:2106-A1

September 2, 2022



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## 1.0 **INTRODUCTION**

The subject property is located at US 67 and Miller County Road 64 in Texarkana, Miller County, Arkansas. The subject property is approximately 1,349 acres in size and is proposed for commercial land development. The subject property is currently agricultural land utilized for grazing.

## 2.0 **ENDANGERED SPECIES ACT LISTED SPECIES**

### 2.1 Indiana Bat (*Myotis sodialis*) - Endangered

Description: The Indiana bat is a small insectivorous migratory bat. The mammal is described as a dark colored bat with mouse-like ears, varying between 1-2 inches long.

Habitat: According to the USFWS the bat hibernates in caves and mines and requires forests for foraging and roosting. Critical habitat for the species has been identified in Missouri, Kentucky, Indiana, Illinois, Ohio, Virginia, North Carolina and Tennessee. The mapped range for the small mammal include the north and west portions of Arkansas.

Conclusion: The subject property contains is not significantly forested and managed for cattle grazing, additionally, caves or mines were not observed on the subject property. Based upon our knowledge and desktop review it is ECS' opinion that suitable forage and roosting habitat for the Indiana bat is not present on the site, and that the species would not be impacted by the proposed project.

### 2.2 Eastern Black Rail (*Laterallus jamaicensis ssp. jamaicensis*) – Threatened

Description: The eastern black rail is a small gray-black bird with red eyes, black bills and pink legs. The small marsh bird has an average length of 4 to 6 inches and a wingspan of 8.7 to 11 inches.

Habitat: The small bird requires dense vegetative cover with an over hanging canopy that allows for movement. The birds can be found in a mix of saltwater to freshwater marshes provided the vegetation is in the appropriate densities. According to FWS the preferred freshwater habitat is generally dominated by cattails, bullrush or sedges. Critical habitat for the species is not available. The mapped range within the state of Arkansas is generally located in close proximity to the Saline River, in the central portion of the state.

Conclusion: A critical habitat for this species has not been identified by the USFWS. The subject property is located in the west portion of Arkansas and does not contain the dense cover and marsh habitat required for the species. Additionally, the property is currently managed for cattle grazing. Based upon our knowledge and desktop review it is ECS' opinion that suitable nesting or foraging habitat for the Eastern Black Rail is not present on the site, and that the species would not be impacted by the proposed project.

### 2.3 Piping Plover (*Charadrius melodus*) - Threatened

Description: The Piping Plover is a small shore bird, about 7 1/4 inches long with a 15 inch wingspan. Distinguishing characteristics include sandy-colored feathers with grayish-brown crowns and backs, white foreheads, and dark bands across their crowns. Dark, but incomplete rings encircle their necks. These

little birds have yellow-orange legs, black bands across their foreheads from eye to eye, and black rings around the base of their necks. They are small, stocky, sandy-colored birds that resemble sandpipers, with short, stubby bills. The young plovers and adult plovers generally return to the same nesting area year after year. Plovers often run short distances, pausing to stare at the ground with a slightly tilted head, before picking a food item from the sand. When not feeding, plovers rest and preen.

Habitat: There are just over 5,000 known pairs of breeding Piping Plovers. Texas is the wintering home for 35 percent of the known population of piping plovers. They begin arriving in late July or early August, and will remain for up to nine months. As shorebirds the Piping Plover's diet includes marine worms, beetles, spiders, crustaceans, mollusks and other small marine animals. Their life span is less than five years, but on occasion, up to 14 years. Piping Plovers migrate through the Great Lakes along the river systems through the Bahamas and West Indies. They are currently found along the Atlantic Coast from Canada to North Carolina and along the shorelines of Lakes Michigan and Superior. Gulf Coast beaches from Florida to Mexico, and Atlantic coast beaches from Florida to North Carolina provide winter homes for plovers. Habitat alteration and destruction are the primary causes for the decline of the Piping Plover. Loss of sandy beaches and lakeshores due to recreational, residential, and commercial development has reduced available habitat on the Great Lakes, Atlantic Coast, and the Gulf of Mexico. Reservoir construction, channel excavation, and modification of river flows have eliminated sandbar nesting habitat along hundreds of miles of the Missouri and Platte Rivers. Winter habitats along the Gulf coast are threatened by industrial and urban expansion and maintenance activities for commercial waterways. Pollution from spills of petrochemical products and other hazardous materials is also a concern. On the breeding grounds, reproductive success can be curtailed by human disturbance. Vehicular and foot traffic destroys eggs and chicks. The presence of people on beaches and sandbar islands inhibits incubation and other breeding behavior. Changes in land use such as agricultural development, urbanization, and use of beaches has brought an increase in the number of unleashed pets and other predators such as gulls, skunks, and foxes. Increased recreational use of Gulf beaches may also threaten the quality of wintering sites. Beach traffic, including vehicles and ATV's, as well as the activities of unleashed dogs, can disturb birds and degrade habitat. Beach raking, a practice associated with high recreational use, removes driftwood, seaweed, and other debris used by roosting plovers, and may disrupt nutrient cycles and remove prey organisms from foraging areas where plovers forage on the beach. In 2001, the total population of Piping Plovers in North America was estimated to be 5,945 breeding adults. The Texas Gulf Coast had the highest wintering population, with about 1,042 individuals detected. This represents about 44% of birds detected on the wintering grounds during the 2001 International Piping Plover Census. Most of the plovers that winter on the Texas coast are found in the lower Laguna Madre, where tidal flats are extensive and productive.

Conclusion: The subject property is located greater than 50 miles from the Gulf, and is not mapped within an area that is known to contain critical habitat for the species. Based upon ECS's knowledge, desktop review and proposed project, it is ECS' opinion that the species would not be impacted by the proposed activities for the site. Therefore, further consideration is not warranted.

#### 2.4 Red Knot (*Calidris canutus rufa*) - Threatened

Description: The Red Knot is a medium-sized shorebird with a wingspan of 20 inches. During breeding season, it has a rust colored face, chest and undersides and dark brown wings. In winter, it has a gray head, chest and upperparts and a white belly. It has long greenish legs and a pointed black bill. Males and females look similar.

Habitat: The Red Knot breeds on islands in the Arctic regions of Canada. It winters along both the Pacific and Atlantic coasts from California and Massachusetts south to South America. The Red Knot is also found in Europe and Asia. The Red Knot breeds on the tundra. During migration and in the winter it can be found on tidal flats, rocky shores and beaches. In its breeding territory, the Red Knot eats the seeds of sedges, horsetails and grass shoots. It may also poke around in snow free areas for invertebrates. It also eats beetles and cutworm larvae. In its winter range, it eats marine worms, grasshoppers, horseshoe crab eggs and other invertebrates.

Conclusion: The subject property is located greater than 50 miles from the Gulf. and is not mapped within an area that is known to contain critical habitat for the species. Based upon ECS's knowledge, desktop review, and proposed project it is likely that the species would not be impacted by the proposed activities for the site. Therefore, further consideration is not warranted.

## 2.5 Monarch Butterfly (*Danaus plexippus*) - Candidate

Description: Adult monarch butterflies are large and conspicuous, with bright orange wings surrounded by a black border and covered with black veins. The black border has a double row of white spots, present on the upper side of the wings. Adult monarchs are sexually dimorphic, with males having narrower wing venation and scent patches. The bright coloring of a monarch serves as a warning to predators that eating them can be toxic. During the breeding season, monarchs lay their eggs on their obligate milkweed host plant (primarily *Asclepias* spp.), and larvae emerge after two to five days. Larvae develop through five larval instars (intervals between molts) over a period of 9 to 18 days, feeding on milkweed and sequestering toxic chemicals (cardenolides) as a defense against predators. The larva then pupates into a chrysalis before emerging 6 to 14 days later as an adult butterfly. There are multiple generations of monarchs produced during the breeding season, with most adult butterflies living approximately two to five weeks; overwintering adults enter reproductive diapause (suspended reproduction) and live six to nine months. Habitat: In many regions where monarchs are present, monarchs breed year-round. Individual monarchs in temperate climates, such as eastern and western North America, undergo long-distance migration, and live for an extended period of time. In the fall, in both eastern and western North America, monarchs begin migrating to their respective overwintering sites. This migration can take monarchs distances of over 3,000 km and last for over two months. In early spring (February-March), surviving monarchs break diapause and mate at the overwintering sites before dispersing. The same individuals that undertook the initial southward migration begin flying back through the breeding grounds and their offspring start the cycle of generational migration over again. Host plants for the Monarch butterfly include many of the milkweed species (*Asclepias* spp.) Milkweed is typically associated with open areas including fields, pastures along fencerows and roadsides. Critical habitat has not been identified for the Monarch Butterfly.

Conclusion: A critical habitat for this species has not been identified by the USFWS. The subject property is an active agriculture site managed for grazing. Suitable habitat did not appear to be located on the subject property. Based upon ECS's knowledge, desktop review and proposed project, it is ECS' opinion that the species would not be impacted by the proposed activities for the site. Therefore, further consideration is not warranted.

### **3.0 CONCLUSIONS**

ECS has reviewed the Official Species List from the United States Department of the Interior Fish and Wildlife Service dated August 12, 2022. ECS does not anticipate any impacts on endangered species or critical habitat due to the proposed development.

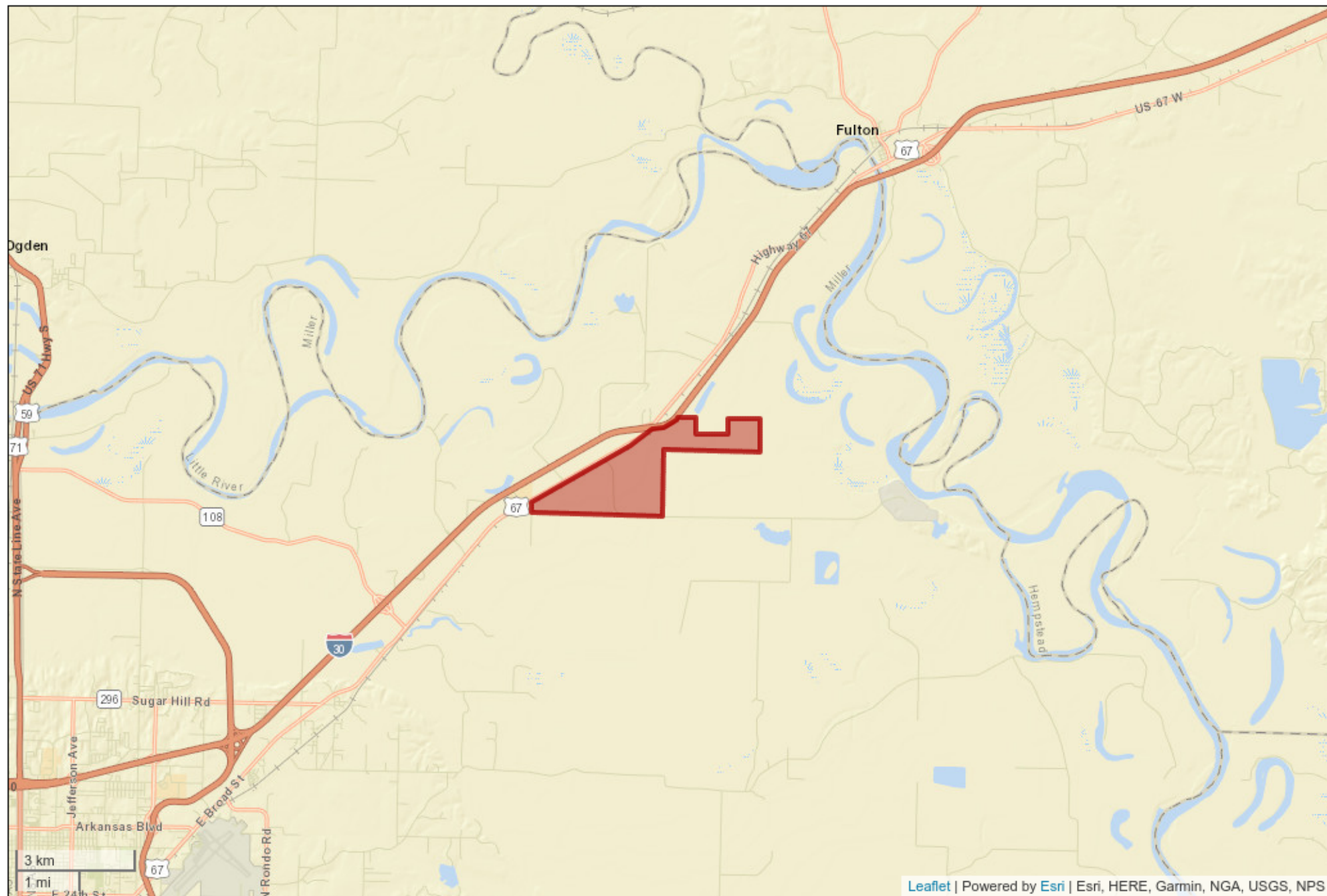
### **4.0 LIMITATIONS**

The findings presented within this report are based upon a reasonable level of investigation within normal bounds and standards of professional practice for a site in this particular geographic and geologic setting. All observations, conclusions and recommendations pertaining to environmental conditions at the subject site are necessarily limited to conditions observed, and or materials reviewed at the time this study was undertaken. No other warranty, expressed or implied, is made with regard to the conclusions and recommendations presented within this report.

This report is provided for the exclusive use of AR-TX REDI. This report is not intended to be used or relied upon in connection with other project or by other unidentified third parties. The use of this report by any undesignated third party or parties will be at such party's sole risk and ECS disclaims liability for any such third party use or reliance.

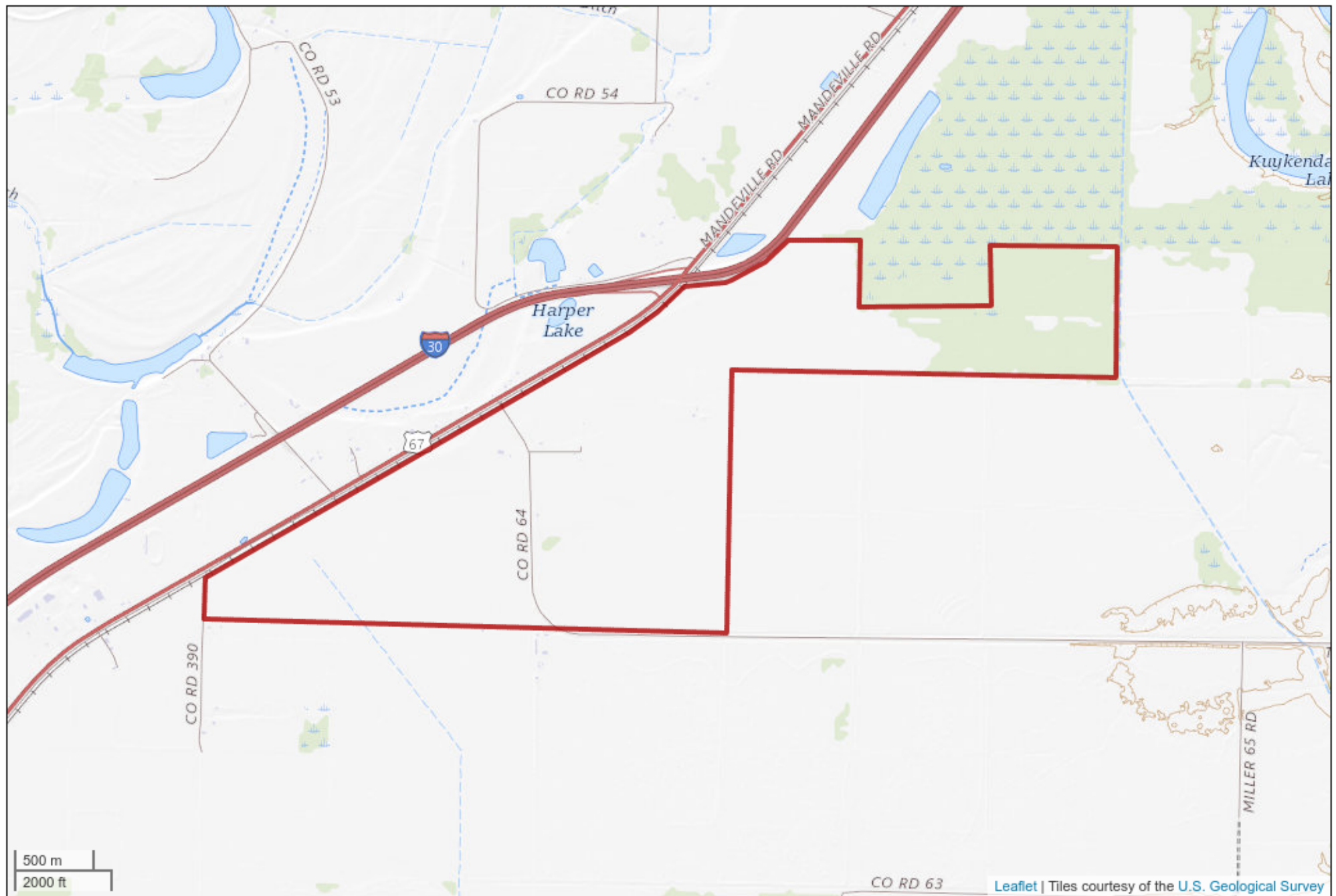
## Site Map





**Figure 1 - Project Location Map**  
REDI Arkansas Manufacturing Center  
US Highway 67 and Miller County Road 64  
Homan Township, Texarkana, Miller County, Arkansas 71854  
ECS Project 51:2106-A1









**Figure 3- Subject Property Map**  
REDI Arkansas Manufacturing Center  
US Highway 67 and Miller County Road 64  
Homan Township, Texarkana, Miller County, Arkansas 71854  
ECS Project 51:2106-A1

## **USFWS Official Species List**



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Arkansas Ecological Services Field Office  
110 South Amity Suite 300  
Conway, AR 72032-8975  
Phone: (501) 513-4470 Fax: (501) 513-4480



In Reply Refer To:  
Project Code: 2022-0074070  
Project Name: REDI Arkansas Manufacturing

August 12, 2022

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

### To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

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Attachment(s):

- Official Species List

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Arkansas Ecological Services Field Office**

110 South Amity Suite 300

Conway, AR 72032-8975

(501) 513-4470

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## Project Summary

Project Code: 2022-0074070  
Project Name: REDI Arkansas Manufacturing  
Project Type: Commercial Development  
Project Description: Commercial  
Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@33.540929,-93.88059121347789,14z>



Counties: Miller County, Arkansas

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## Endangered Species Act Species

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is <b>final</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a>	Endangered

## Birds

NAME	STATUS
Eastern Black Rail <i>Laterallus jamaicensis ssp. jamaicensis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/10477">https://ecos.fws.gov/ecp/species/10477</a>	Threatened
Piping Plover <i>Charadrius melodus</i> Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is <b>final</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/6039">https://ecos.fws.gov/ecp/species/6039</a>	Threatened
Red Knot <i>Calidris canutus rufa</i> There is <b>proposed</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/1864">https://ecos.fws.gov/ecp/species/1864</a>	Threatened

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## Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

**IPaC User Contact Information**

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