

#E1-1728
RG



October 28, 2005

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RE: SRG Rail line: Tortoise and other small animal exclusion devices

Dear Mr. Ponebshek:

This letter is in response to the October 04, 2005 meeting notes you prepared regarding potential impacts to small animals, particularly tortoises and box turtles, associated with the proposed Southwest Gulf Railroad (SGR) line in Medina County. Texas Parks and Wildlife Department (TPWD) appreciates the opportunity to meet and discuss the project and potential alternatives to address our concerns.

As stated in the meeting and reflected in the meeting notes, TPWD is concerned with the physical and behavioral barriers created by railroads that result in fragmenting the habitat. Also, and more specifically, TPWD is concerned with direct impacts to the threatened Texas Tortoise (*Gopherus berlandieri*) as well as the Western Ornate Box Turtle (*Terrapene ornata ornata*) becoming trapped between rail lines. Mitigative measures to address these issues were discussed during the meeting.

To avoid or minimize fragmentation impacts, TPWD strongly recommends including corridors at intervals equal to or less than one-eighth of a mile that link habitats in the project area. TPWD concurs with the proposed measure that these corridors may result from bridges or culverts constructed to cross waterbodies or topographic features or from the installation of culverts through the railroad ballast.

Potential impacts regarding tortoises and other small animals consist primarily of becoming trapped between rail lines where they are susceptible to predation and physiological stresses including: 1) the core body temperature reaching the critical thermal maximum (the point at which tortoises are incapable of coordinated locomotion), 2) dehydration and 3) death. TPWD staff recommended surveying the project corridor to determine the presence/absence of tortoises near the project area. Because the Texas Tortoise is crepuscular (*i.e.*, most active at twilight) and hibernates (or more correctly "brumates") generally from October through March or April, determining their actual presence in the area with any degree of



Take a kid
hunting or fishing
• • •
Visit a state park
or historic site

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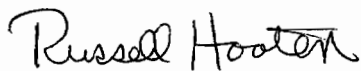
confidence could be extremely difficult and expensive. Surveys would also have to be postponed until Spring 2006 at the earliest.

TPWD strongly recommends employing more cost effective mitigative measures to avoid potential tortoise entrapment impacts. Such measures include installing either escape devices at intervals along the tracks or barriers at at-grade crossings. Beveled escape ramps described by TPWD staff placed at intervals along the rail would provide stranded tortoises a means of escape in multiple places. Alternatively, a flexible barrier described by Mr. Mase, a consultant on the project, installed at at-grade crossings would prevent tortoises from entering the intra-rail space. Other alternatives discussed at the meeting included a cattle-guard type device between the tracks or a pit-fall into a culvert under the tracks to prevent tortoises from becoming trapped between the tracks. It is the opinion of TPWD staff that any of these devices could be engineered to avoid potential conflicts (*i.e.*, entanglements or snagging) with hoses hanging from rail cars.

While no one exclusion device is endorsed over another, TPWD strongly encourages one of the measures to be incorporated into project plans to avoid impacts to the state listed Texas Tortoise. TPWD staff appreciates your interest in Texas' wildlife resources and this agency's efforts to protect them.

Thank you for the opportunity to provide comments on this portion of the SGR Rail Line project. Please contact me at (361) 825-3240 if we may be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Russell Hooten".

Russell Hooten
Wildlife Habitat Assessment Program
Wildlife Division

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