



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

February 15, 2011

CPT Basa  
Texas Army National Guard  
P.O. Box 5218  
Austin, TX 78763-5218

SUBJECT: Programmatic Environmental Impact Statement (PEIS) for South Texas Training Center, McMullen County, Texas

Dear CPT Basa:

The Environmental Protection Agency (EPA) Region 6 has received your correspondence, dated February 3, 2011, regarding the scoping request. In accordance with the National Environmental Policy Act, and under Section 309 of the Clean Air Act, our agency is providing the following comments to assist you with the preparation of PEIS.

According to the report "Modernizing NEPA Implementation: The NEPA Task Force Report to the Council on Environmental Quality" (September 2003), a PEIS should "state the significant issues and clarify what the purpose of the first tier document is in relationship to subsequent levels of analyses and documentation." A PEIS should focus on a broad-scale analysis rather than a site-specific analysis. Site-specific analyses should occur in tiered documents. The PEIS should analyze issues on an ecosystem-wide basis and analyze impacts to biodiversity. The PEIS should also focus on cumulative impacts of the land acquisition and subsequent use as a live-fire training area. An assessment of the project area showed that the area has high ecological value in regards to ecosystem diversity and sustainability. EPA suggests using the Texas Ecological Assessment Protocol (TEAP) methodology to determine ecologically sensitive areas within the proposed project area that should be avoided or protected. TEAP is a product of the Texas Environmental Resource Stewards (TERS) effort which analyzes existing broad-scale electronic data to identify important ecological areas in Texas. For more information on TEAP, and to download the raw data, please visit <http://www.epa.gov/region6/6en/xp/enxp2a4.htm>.

We appreciate the opportunity to participate in the scoping process. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or [macfarlane.john@epa.gov](mailto:macfarlane.john@epa.gov) should you have any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhonda Smith", written over a circular stamp.

Rhonda Smith  
Chief, Office of Planning and  
Coordination