

2016 Edwards Aquifer Habitat Conservation Plan Work Plans					
Comments/Responses					
Comment	Comment Submitted by	HCP Comment/Response	Responsible Responder	Comment Incorporated? Y/N	Permittee Comments
<p>Measure 5.7.6 - Regarding the \$95,000 proposed expenditure at the Comal Springs Conservation Center, SAWS would like to submit the following question to the Science Committee regarding this measure: "Given the generally high-quality of water in this spring system, and the fact that there are plans for this entire site to be re-vegetated, is there any value to the species from further filtering stormwater that has flowed across an already re-vegetated site, and despite discovering few concerning indicators while the site is, presently, largely impervious?"</p>	SAWS	Referred to NB	NB	Y	<p>The City of New Braunfels (City) requests redirecting \$95,000 from the Impervious Cover/ WQ Protection task to support the removal of existing impervious cover for the NBU Comal Conservation Center in lieu of funding the construction of bioswales and other LID BMP's along the waters edge; which was supported by the HCP Science Committee with respect to improving water quality. The HCP states that the City shall incentivize the removal of impervious cover on public and private property. The City feels that funding the removal of existing impervious cover at the NBU Comal Conservation Center is consistent with the City's requirements as stated in the HCP. The removal of impervious cover at the Comal Conservation Center is expected to reduce sediment discharges to Landa Lake by approximately 9,750 lbs (annually). The cost of removing the existing impervious cover is \$0.85 per square foot. Approximately 8 acres of existing impervious cover is planned to be removed during the course of the entire project. The City requests to apply \$95,000 towards the removal of approximately 2.57 acres of existing impervious cover which directly relates to the language in the HCP for this task. The removal of 2.57 acres of impervious cover will provide the water quality benefit of eliminating more than 3,000lbs/ yr of sediment, as well as other associated pollutants, from reaching the Comal River system. The City has revised the 2016 Workplan to include the removal of existing impervious cover at the Comal Conservation Center in lieu of installation of a bioswale and other stormwater treatment BMPs.</p>
<p>Measure 5.2.11 - The EAHCP states that funding for golf course operations can only be sought if the operations of the golf course are requested to be changed in a way that causes increased operational costs to the course itself, and then only in the incremental increase of costs. \$1,000 for signage on a city project seems to be outside the scope of the EAHCP in that the signage was not requested nor required by the EAHCP and is not an incremental increase in ongoing operations of the course.</p>	SAWS	Referred to NB	NB	Y	<p>The City of New Braunfels retracts the request for \$1,000 in funds that relate to HCP concepts in/around the Golf Course</p>