



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

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**FEB 23 2018**

Nathan Pence  
Edwards Aquifer Habitat Conservation Plan  
900 East Quincy Street  
San Antonio, Texas 78215

Dear Mr. Pence:

This letter is in response to your February 21, 2018, letter requesting to amend the Edwards Aquifer Recovery Implementation Program Habitat Conservation Plan (EAHCP). The Edwards Aquifer Authority, City of San Marcos, Texas State University, City of New Braunfels, and the San Antonio Water System (collectively, the Permittees) are requesting changes to the EAHCP in section 5.5.1, Use of SAWS ASR (Aquifer Storage and Recovery) for Springflow Protection. Exhibit 1 of your letter includes specific revisions of text *verbatim* that the Permittees would like revised in the EAHCP. Exhibit 2 documents the Permittees use of the adaptive management process and provides supporting information. The Permittees have not requested to amend the Permit (TE-63663A-1).

The proposed revisions change section 5.5.1 of the EAHCP to simplify the ASR program's approach to groundwater leasing and lease options from three tiers to two tiers of leasing and forbearance. In addition, the amendment requires exercising agreements of forbearance of water withdrawal when the 10-year rolling average of estimated annual recharge declines to 500,000 acre-feet or less. Currently, the program operates under two 10-year rolling averages of 572,000 acre-feet and 472,000 acre-feet. The Permittees studied the effects of the proposed changes to springflows by comparing expected springflows under the current program with expected springflows under the modified program using the updated MODFLOW groundwater model. The model results indicate no decrease to expected springflows during critical periods of drought.

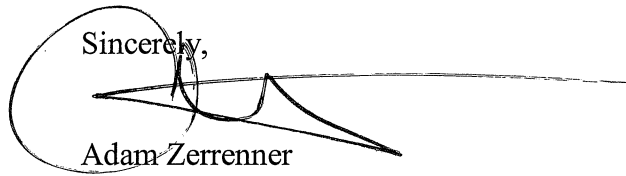
Chapter 6 and Appendix R of the EAHCP describe the Adaptive Management Process that allows the Permittees to make experience-based improvements to the program. The Adaptive Management Process includes review and acceptance by the Science Committee, Stakeholder Committee and the Implementing Committee. All the steps in the process were followed and each committee has approved of the revisions to the EAHCP, and the public was provided with opportunities to comment on the proposal.

No changes to the Permit have been requested or will be made. This amendment to the EAHCP will not increase the levels of incidental take of Covered Species because springflows will not be



decreased. As always, thank you for your continued contribution to the conservation and recovery of imperiled Texas native plants and animals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Zerrenner', is written over a horizontal line. The signature is stylized with a large initial 'A' and a long horizontal stroke extending to the right.

Adam Zerrenner  
Field Supervisor