



September XX, 2016

Mr. Adam Zerrenner  
United States Fish and Wildlife Services  
Austin Ecological Services Field Office  
107011 Burnet Road, Suite 200  
Austin, Texas 78758

**RE: Clarification to the specified vegetation in Table 4-1 of the Edwards Aquifer Habitat Conservation Plan (EAHCP) Biological Goals for fountain darter habitat in the Comal River for the Incidental Take Permit (#TE-63663A-1).**

On behalf of the City of New Braunfels (CoNB), the City of San Marcos (CoSM), Edwards Aquifer Authority (EAA), the San Antonio Water System (SAWS), and Texas State University (collectively the Permittees of the Incidental Take Permit #TE-63663A-1), I am providing a clarification to the Edwards Aquifer Habitat Conservation Plan (EAHCP) to remove non-native aquatic vegetation goals in Tables 4-1 (p. 4-4) and replace them with native aquatic vegetation goals for the Comal Springs ecosystem. As a result of these changes, adjustments to the coverage of the specific native aquatic vegetation has also been altered to respond to lessons learned in restoring fountain darter habitat.

Section 4.1.1 of the EAHCP discusses the Biological Goals and Objectives associated with the Covered Species. Table 4-1 provides guidance to the permittees in square meter coverage of specified aquatic vegetation for designated Long-term Biological Goal (LTBG) Reaches<sup>1</sup> for the Comal Springs ecosystem. It is proposed that certain changes to Table 4-1 (Exhibit 1) are warranted to properly maintain a diverse community of native aquatic vegetation and maximize fountain darter habitat. These changes include the complete removal of all filamentous algae and non-native *Hygrophila polysperma* from the Biological Goals and replace these goals with native *Potamogeton illinoensis*.

In order to find the most adequate distribution of ideal habitat for the fountain darter, the proposed goals have additional native vegetation and an altered distribution for all vegetation types originally identified in Table 4-1. As a result of this change, the estimated relative abundance of fountain darters within respective reaches will increase by 568.

Since December 2015, the EAHCP has pursued an analysis of the current programs for submerged aquatic vegetation restoration in the San Marcos and Comal Springs systems. In this analysis, lessons learned as well as proposed revisions were brought forward and ultimately reviewed by subject matter and regional experts, as well as the EAHCP Committee members. A Scientific Evaluation Report (SER) was produced and adopted by the Science Committee to provide any necessary directive in regards to the Adaptive Management Proposal (Exhibit 2) which was later supported by the Stakeholder Committee and adopted by the Implementing Committee on September 15<sup>th</sup>. This process was in accordance with the Adaptive

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<sup>1</sup> The Long-term Biological Goal (LTBG) Reaches refer to the reaches specified in the EAHCP that determine our Biological Goals for the aquatic vegetation restoration and fountain darter habitat (Table 4-1).

Management Process outlined in the Funding and Management Agreement (FMA) and results in this request to clarify and amend the EAHCP.

With that said, to further ensure transparency in the implementation of the EAHCP, the Implementing Committee provided the public the opportunity to comment on this clarification during its September 15, 2016 meeting. All meeting agendas and minutes from this process have been provided in Exhibit 3.

The Permittees seek your formal acceptance of this clarification to allow alterations to Table 4-1 of the EAHCP to reflect removal of all non-native aquatic vegetation in the Comal Springs ecosystem in order to most effectively limit the re-establishment of non-native aquatic vegetation. Your approval of this clarification will allow the Permittees to implement this critical aspect of the EAHCP. We look forward to your formal acceptance of this clarification and appreciate your consideration and response on this issue.

Respectfully,

Nathan Pence  
Program Manager  
Edwards Aquifer Habitat Conservation Plan

DRAFT

**Proposed changes to EAHCP p. 4-4 (Table 4-1)****TABLE 4-1****FOUNTAIN DARTER HABITAT (AQUATIC VEGETATION) IN METERS SQUARED (M2) AND FOUNTAIN DARTER MEDIAN DENSITY (NUMBER/M2) PER HABITAT TYPE**

Fountain darter habitat (aquatic vegetation) goal in meters squared (m <sup>2</sup> )							
Study Reach	<i>Bryophytes</i>	<i>Hygrophila</i> <i>Potamogeton</i>	<i>Ludwigia</i>	<i>Cabomba</i>	<del>File</del> <i>Algae</i>	<i>Sagittaria</i>	<i>Vallisneria</i>
Upper Spring Run Reach	<del>1,850</del>	650	150	0	0	600	0
	1,750	0	25	25		850	
Landa Lake	<del>4,000</del>	250	900	500	0	<del>1250</del>	<del>13,500</del>
	3,950	25				2,250	12,500
Old Channel	150	200	<del>1,500</del>	0	300	0	0
	550	0	425	180		450	
New Channel	150	<del>1,350</del>	0	<del>350</del>	0	0	0
		0	100	2,500			
TOTAL	<del>6,150</del>	2,450	2,550	850	300	<del>1850</del>	<del>13,500</del>
	6,400	25	1,450	3,205		3,550	12,500
Fountain darter median density number/m <sup>2</sup>							
	<i>Bryophytes</i>	<i>Hygrophila</i> <i>Potamogeton</i>	<i>Ludwigia</i>	<i>Cabomba</i>	<del>File</del> <i>Algae</i>	<i>Sagittaria</i>	<i>Vallisneria</i>
	20	<del>4</del> 3.3	7	7	44	1	1