



MEMO

TO: Nathan Pence
FROM: Rodney Cobb and William Nance
DATE: September 5, 2013
RE: EAHCP Project Procedures during Flows < 120 cfs

Section M of the Incidental Take Permit for the Edwards Aquifer Habitat Conservation Plan (EAHCP) states that the City of San Marcos (COSM) and Texas State University (TxSt) will suspend activities that may result in disturbance of the substrate, water quality, plants, animals and invertebrates of the San Marcos Springs, Spring Lake and River when flows decline to 120 cfs or lower.

Flows in the San Marcos River, according to the USGS measurements for September 4, are 106 cfs. In January 2013, the Implementing Committee requested that a group of resident experts and contractors be convened specifically to address the question of which activities permitted under the 2013 HCP work plans, might need to be suspended under drought conditions and at what flow rates any actions would be stopped. The unanimous consensus of the experts for the San Marcos system was that, given the nature, work location, small areas, and approved techniques of the EAHCP projects as outlined in the 2013 work plans, they should be able to continue over spring flow rates as low as ~60cfs without significant impact. COSM and TxSt have determined that monitoring of EAHCP conservation measures will be based on real time data, water quality data, and habitat condition to determine if they should continue or cease. Projects are monitored daily to determine if they are significantly impacting listed species.

Additionally, on September 4, 2013, a public meeting was held to discuss this issue with three members of the Science Committee, EAA HCP Project Manager and the spring cities' HCP Implementation staff & contractors. It was agreed that projects should move forward under daily monitoring.

5.3.6/5.4.4 Sediment Removal

Water quality sondes are in place to monitor turbidity levels. An observer on the bank will also monitor the sediment plume during sediment removal. The technique explicitly removes fountain darters from these small surface areas to suitable habitat adjacent to the work being conducted. Work will be suspended and remedial methods undertaken in the event of excessive sediment moving downstream. Suctioned sediment is isolated from reentry to the stream in a pit surrounded by silt fence on the bank.

5.3.8/5.4.12 Non-native plant removal

The activity is designed to be non-intrusive in that only 1 meter sections adjacent to Texas wild-rice will have non-native plant removal. We do not anticipate that undue amounts of sediment will be dislodged from these actions given the small areas involved. These activities do not result in disturbance of Texas wild-rice. The protocol also ensures that fountain darters and other organisms are removed from the vegetation being targeted for removal. Also, the majority of the plant removal is followed by plantings of native plants which have expanded rapidly to fill the area of removal.

5.3.1/5.4.1 Texas wild-rice enhancement/restoration

This measure is embedded within the two work elements discussed above (5.3.6/5.4.4 and 5.3.8/5.4.12). Invasive non-native plants are removed from within and around TWR stands. New TWR individuals are planted in areas of non-native plant removal.

5.3.3/5.4.3 Litter and Floating Vegetation Mat Removal

This activity is performed by experienced divers that have been through the Scientific Diving Course at the Meadows Center. From direct observations, their actions do not result in substantive sediment suspension and movement downstream or habitat disturbance. During times of dropping flows, vegetation mats build more quickly and with increased depth. So the removal of floating vegetation gains more value during low flows.

5.3.9/5.4.13 Non-native Species Control

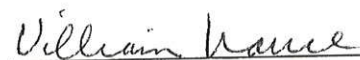
This activity primarily utilizes gigging, is non-native species specific, and results in minimal suspension of sediment, disturbance to aquatic vegetation or other animals within the river.

As a result of decreasing river depth, more areas of the river are accessible than during average flows. Therefore, non-native plant removal will be suspended in areas in which their removal would open up recreational access.

TWR enhancement will only be accomplished in areas that receive sufficient flow and depth during low flows to sustain growth of newly installed plants.

No change to sediment removal, litter and floating mat removal and non-native species control as these measures are important for the protection of listed species, particularly during low flows. However, extra precautions will be taken to avoid disturbance of habitat.


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