



PUBLIC WORKS

To: Nathan Pence
From: Steve Ramsey and Zac Martin
Re: EAHCP Project Procedures during Flows < 130 cfs

September 9, 2013

Section M of the Incidental Take Permit for the Edwards Aquifer Habitat Conservation Plan (EAHCP) states that the City of New Braunfels (CONB) will suspend activities such as habitat restoration and riparian restoration that may result in disturbance of the substrate, water quality, plants, animals and invertebrates of the Comal Springs, Landa Lake, and the Comal River when Comal Springflows decline to 130 cfs or lower.

Total discharge in the Comal River (Landa Lake and Comal Springs), according to USGS statistics for Sept. 9th, 2013 is \approx 116 cfs. In view of the ongoing EAHCP activities, the CONB has considered impacts of these activities on listed species.

In January 2013, the EAHCP Implementing Committee requested that a group of resident experts and contractors be convened specifically to address the question of which activities permitted in the 2013 EAHCP work plans might need to be suspended under drought conditions and at what flow rates should any actions be stopped. The unanimous consensus of the experts for both the Comal and San Marcos systems was that given the nature, work location, small areas of impact and approved techniques of the EAHCP projects as outlined in the 2013 work plans, the decision to continue work should be based on field observations and the condition of the system at the present time. Based on the meeting and subsequent monthly notices to the U.S. Fish and Wildlife Service, the City of San Marcos has been conducting activities in the San Marcos system below their target level of 120 cfs since April.

CONB is now addressing the same issue regarding this clause and total system discharge being below 130 cfs. With continuing springflow decline, the EAHCP Implementing Committee requested a follow up meeting (held on September 3rd) with the resident experts and contractors to determine if activities should be continued or might there be need for suspension. Again, the consensus of the experts was in concurrence with the first meeting, the decision should be based on field observations and present system conditions.



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Based on continued bio-monitoring at Comal Springs, the CONB has determined that the EAHCP project work shown below will continue, however, these activities will be monitored to determine the point at which they may significantly impact listed species.

5.2.2 Native Aquatic Vegetation Restoration and Maintenance

CONB is actively working in Landa Lake, the Old Channel and the New Channel as part of Native Aquatic Vegetation Restoration and Maintenance. This involves supporting the aquatic plant nursery in Landa Lake via restocking with source material from the New Channel approximately once per month. This also includes selective removal of non-native vegetation with subsequent planting of native vegetation as well as gardening of restored areas, in both Landa Lake and the Old Channel. The continual installation of new vegetation will stabilize and provide increased habitat for the species. Due to new vegetation largely being installed by hand and utilizing a boat/kayak so as not to disturb sediments, very minimal impacts to the habitat are achieved.

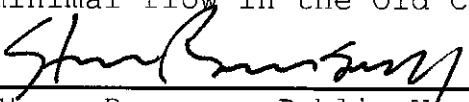
5.2.10 Litter Collection and Floating Vegetation Management

CONB is actively removing litter and floating mats of decaying vegetation in Comal Springs, Landa Lake and the Old and New Channels of the Comal River. The experienced divers have been through the Scientific Diving Course at the Meadows Center to learn to minimize disturbance by identifying biological resources and their associated habitat. Their actions do not result in substantive sediment suspension and movement downstream or habitat disturbance.

5.2.1 Flow split management

Culvert and Gate Repair:

Important to overall system management, especially during drought, the group recommended as a priority maintaining Old Channel habitat in good condition. To achieve this, culvert and gate repairs should proceed with haste to ensure minimal flow in the Old Channel to protect habitat.



Steve Ramsey - Public Works Director