



November XX, 2015

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

RE: Information Regarding the Edwards Aquifer Habitat Conservation Plan (EAHCP) and the Incidental Take Permit (ITP) #TE-63663A-1, related to Vegetation Restoration in the Comal and San Marcos Springs systems

Dear Adam:

The purpose of this letter is to inform you of issues relating to vegetation restoration in the EAHCP: calculation of Texas Wild-rice coverage, initiation of Adaptive Management for vegetation restoration, and adjustments to flow-split infrastructure operations to the Old Channel of the Comal River.

Calculation of Texas Wild-rice Coverage

Through the Comprehensive Biological Monitoring program, the Edwards Aquifer Authority (EAA) conducts an annual assessment of Texas Wild-rice coverage (TWR) in the San Marcos springs system. This monitoring is required in the EAHCP, but has been conducted for the last 15 years with consistent methodologies and professional staff. We are aware that the San Marcos Aquatic Resource Center (SMARC) also has begun monitoring of TWR coverage. Per the EAHCP, we intend to use the EAHCP generated coverage amounts for the purposes of reporting and compliance.

Native Aquatic Vegetation Restoration and Non-native Species Control

Since 2013, the City of New Braunfels and the City of San Marcos/Texas State University have been removing non-native aquatic vegetation and replacing it with native aquatic vegetation. As would be expected, there have been successes and challenges. To utilize lessons learned and ensure we achieve the goals established in the EAHCP for fountain darter habitat for both the Comal and San Marcos springs system and Texas Wild-rice in the San Marcos system, we have initiated for the first time, formal Adaptive Management as established by the EAHCP and supporting documents. The Permittees have engaged a contractor to perform an analysis of current progress, establish a schedule to accomplish the vegetation restoration Biological Goals in the EAHCP, and make any recommendations for changes needed, based on experience since beginning implementation of the EAHCP. Information derived from this contract will be used by the Implementing Committee to establish needed modifications, if necessary.

Flow-Split Management in the Old and New Channels of the Comal River

Since the development of Table 5-3 (Flow-split management for Old and New Channels), the past four years of data collection (habitat, flow and darter densities), indicates that increases in flow above 65 cfs to

the Old Channel via the Flow-split will not benefit endangered species habitat but conversely start causing destruction of significant amounts of existing habitat. In fact, it is believed that increasing flows to 70 or 80 cfs in the Old Channel will be detrimental to fountain darter habitat especially in the highly restored areas above Elizabeth Street.

With the EAHCP Science Committee support and recommendation, the Permittees will not be increasing the flows in the Old Channel above 65 cfs as currently required by Table 5-3.

The Permittees will use information generated from the Adaptive Management contract above to determine if a new regime of flows for the Old Channel should be implemented.

I am submitting this letter at the direction of the EAHCP Permittees. With this said, the Implementing Committee and I look forward to your concurrence, in writing, to these courses of action on these issues.

Respectfully,

Nathan Pence
Program Manager
Edwards Aquifer Habitat Conservation Plan