

Client/Project: Edwards Aquifer Habitat Conservation Plan Annual Report							Project No.: 27474	
Comment / Response Form							Comment Type:	
Document:							1	Potentially serious quality issue; requires decision from EAA management
Date: January 25, 2014							2	Minor comment that can be readily addressed
							3	Comment is editorial or otherwise minor in nature with little effort to implement.
Reference Page Number / Line Number	Line Number	Reviewer	Reviewer Comment	Accept Comment? Y/N	EAA Comment/Response	Comment Type	Responsible Responder	Response
11	23	SAWS	Suggest striking "is"	Y	Agree	3	SWCA	
20	23	SAWS	Strike comma after "Although"	Y	Agree	3	SWCA	
20	35-37	SAWS	The Annual Report should include greater specificity concerning the <u>series</u> of refugia the USFWS is proposing in 2014.	Y	Agree	2	EAA	
24	16-31	SAWS	SAWS would like a volumetric water conservation goal for 2014 to be added to the Proposed Activities for this measure.	Y	While a volumetric goal might be beneficial, the 2014 workplan does not address this item.	2	N/A	
31	6	SAWS	The description of the Biological Monitoring Program's purpose in this draft is incomplete. The Biological Monitoring Program is described more accurately on Page 6-3 of the EAHCP as "provid[ing] a means of monitoring changes to habitat availability and the population abundance of the Covered Species that may result from <b>Covered Activities.</b> " Covered Activities include impacts to the aquatic ecosystems by more than just changes in flow levels.	Y	Agree	2	SWCA	
31	36	SAWS	The purpose of the new groundwater model development should not be developed to "validate" MODFLOW. If MODFLOW results are being used as the benchmark in the development of the new groundwater model, that is a scientifically unsound approach (deliberate biasing of the new model). The new groundwater model, once calibrated, should be used concurrently with MODFLOW for a time. The EAHCP stakeholders will learn from when the models agree, when they differ, and why. The Funding and Management Agreement outlines the requirements of the new groundwater model (Section 7.13.2(c) ).	Y	Agree	2	SWCA	
32	12	SAWS	Suggest: The ecological model "will inform" the Adaptive Management Process (rather than "influence").	Y	Agree	3	SWCA	
34	8	SAWS	Suggest: Change SMARC to Freeman Aquatic Building (unsure)	Y	Agree	2	SWCA	Add language as to why the FAB is being used for Applied research instead of SMARC
34	12	SAWS	While no specific change is requested with this comment, the EAHCP may want to begin considering whether the applied research outlined in the EAHCP should be expanded to include evaluation of the sediment sampling results on benthic organisms, such as some of our Covered Species and their prey, given the 2013 findings of certain metals, chlordane, and PAHs at some locations above probable effect concentrations. For example, see the 2001 USGS study on the Barton Springs salamander: <a href="http://www.fws.gov/southwest/es/Documents/R2ES/LitCited/4TX_Sal/Ingersoll_et_al_2001_Barton_Spring_sediment_quality_draft.pdf">http://www.fws.gov/southwest/es/Documents/R2ES/LitCited/4TX_Sal/Ingersoll_et_al_2001_Barton_Spring_sediment_quality_draft.pdf</a>	Y	This is a policy item and not addressed in the 2014 workplan		N/A	
36	28	SAWS	Surface water diversions are authorized by the State, not the City.	Y	Agree	3	SWCA	
42	14-18	JP	Define "success"; provide % of plots that reached 90% cover; provide a % for "lower native plant cover"	Y	This item will be completed by CoNB	2	CoNB	
51	11	SAWS	"Likelihood" is misspelled.	Y	Agree	3	SWCA	
59	12	SAWS	Insert the word "a" between "under" and "separate"	Y	Agree	3	SWCA	
61	12-15	SAWS	The proposed activities for 2014 under EAHCP Section 5.2.9 are inconsistent with the EAHCP, which calls for a <b>prohibition</b> of live bait.	Y	This item will be completed by CoNB	2	CoNB	
81	1-2	JP	The map shows the proposed HAZMAT route crossing Purgatory Creek, a tributary of the San Marcos River. Please explain how a spill would not end up in the San Marcos River.	Y	While important, this is not an item to be addressed in the Annual Report.		N/A	

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83	29-40	JP	This section should clearly apply to plants as well as animals.	Y	This item will be completed by CoSM	2	CoSM	
84	1-7		This section should clearly apply to plants as well as animals.	Y	This item will be completed by CoSM	2	CoSM	
84	18	JP	Reword sentence so that it doesn't imply that Texas wild-rice will be removed. Perhaps "unoccupied" or "potential" Texas wild-rice habitat would be better.	Y	Agree	3	SWCA	
91	12	JP	What is the reasoning behind the ratio of hard to soft mast trees and the 20% fruit-bearing shrubs? How will this contribute to the recovery of the aquatic endangered species?	Y	This item should be address during Science Committee Review and Comment		N/A	
94	11	SAWS	Please provide additional evidence supporting the contention that <i>Potamogeton illinoensis</i> and <i>Hydrocotyle</i> reintroduction efforts were unsuccessful during the summer months of 2013 because of "low-flow effects." Observed data for 2013 indicate that San Marcos Springflow rarely dipped below 100 cfs. This is below the historical average for the summer months, but far above the low-flow levels predicted for San Marcos Springs during severe droughts. If low flow effects were, in reality, responsible for these unsuccessful eco-restoration efforts in 2013, SAWS questions whether the selected areas are good candidates for native vegetation reintroduction and worth the expenditure of EAHCP funds, or whether those resources should be redirected to other efforts. Might State Scientific Study area protection measures for restored plots be a potential solution?	Y	This item will be completed by CoSM	2	CoSM	
99	7-9	JP	Could this anecdotal observation be quantified by comparing Texas wild-rice mapped coverage between 2012 and 2013?	Y	This item will be addressed further in the 2013 Take Estimation Report completed by BIO-WEST		N/A	
103	105	JP	There are two Figure 42s. The next figure is 45. All figure numbers should be checked on figures as well as in the text.	Y	Agree	3	SWCA	
103	13-14	JP	Table 3-20 & Fig. 3-45 refer to Plecostomus, not Tilapia. Table 3-21 refers to both Plecostomus & Tilapia. The caption for this table should be "...non-native fish removal" as snails and other organisms are not mentioned.	Y	Agree	2	SWCA	
106	1-4	JP	Are there no proposed 2014 activities for snail removal?	Y	This item will be completed by CoSM	2	CoSM	
109	8-9	JP	What will be planted where the elephant ears are removed?	Y	This item will be completed by CoSM	3	CoSM	
112	27	JP	This is Fig. 3-49, not Fig. 30.	Y	Agree	3	SWCA	
129	4 & 9	SAWS	The months named in the paragraph do not match the months in Table 3-25	Y	Agree	3	SWCA	
130	14-16	JP	Should this really be 29 cfs? The next bullet says that all surface water diversions will be ceased at 45 cfs?	Y	This item will be completed by CoSM	3	CoSM	
131	16	SAWS	"Outflow" is mis-spelled	Y	Agree	3	SWCA	
131	13	JP	Should be figure 3-52.	Y	Agree	3	SWCA	
133	14-15	SAWS	Suggest: Change River Systems Institue to MCWE	Y	Agree	3	SWCA	
135	33	SAWS	Suggest: Change "1o" to "10"	Y	Agree	3	SWCA	
137	4	JP	Could "left" be replaced with a cardinal direction?	Y	Agree	3	SWCA	
138	10-17	JP	Why do the totals in the text not match the totals in the table?	Y	This item will be completed by CoSM	3	CoSM	
139	8	SAWS	See comment # 13 concering "low flow effect" contentions.	Y	This item will be completed by CoSM	3	CoSM	
153	5 & 8	SAWS	The statement on Line 8 "preventing the need for additional enforcement" of the Texas Wild-rice protection barriers is inconsistent with the bullet point beginning on Line 19 of Page 120	Y	Agree	2	SWCA	Inserted the word "law" between additional and enforcement