

Alamo Group of the Sierra Club
Aquifer Guardians in Urban Areas
Austin Regional Sierra Club
Bexar Audubon Society
Bexar Green Party
Castroville Smart Growth Coalition
Cibolo Nature Center
Environmental Stewardship
Committees of the Episcopal Church
of Reconciliation & Episcopal
Diocese of West Texas
Environment Texas
First Universalist Unitarian Church of
San Antonio
Friends of Canyon Lake
Fuerza Unida
Government Canyon Natural History
Association
Hays Community Action Network
Helotes Heritage Association
Hill Country Planning Association
Guardians of Lick Creek
Kendall County Well Owners
Association
Kinney County Ground Zero
Medina County Environmental Action
Association
Northwest Interstate Coalition of
Neighborhoods
Preserve Lake Dunlop Assoc.
Preserve Our Water-Blanco County
San Antonio Conservation Society
San Geronimo Valley Alliance
San Geronimo Watershed Alliance
San Marcos Greenbelt Alliance
San Marcos River Foundation
Santuario Sisterfarm
Save Barton Creek Association
Save Our Springs Alliance
Scenic Loop/Boerne Stage Alliance
Sisters of the Divine Providence
Smart Growth San Antonio
SEED Coalition
Texas Water Alliance
Travis County Green Party
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed
Association

March 10, 2008

Nathan Allan
Biologist
U.S. Fish and Wildlife Service
10711 Burnet Road, Suite 200
Austin, Texas 78758

**RE: COMMENTS ON THE DRAFT ECONOMIC ANALYSIS OF CRITICAL
HABITAT FOR THE DEVILS RIVER MINNOW**

Dear Mr. Allan:

We appreciate the opportunity to submit these comments on the Draft Economic Analysis (DEA) of Critical Habitat for the Devils River Minnow (DRM) on behalf of the forty member organizations of the Greater Edwards Aquifer Alliance (GEAA).

GEAA has endorsed comments submitted by the WildEarth Guardians on the DEA, and we strongly support their recommendation to include all habitat under consideration in the final critical habitat designation, including Las Moras and Sycamore Creeks. Additionally, we urge the U.S. Fish and Wildlife Service ("Service") to consider the following comments and recommendations:

- 1) An economic analysis of repopulation efforts should be conducted for both Sycamore and Las Moras Creeks. The Service has asserted that repopulation of Sycamore and Las Moras Creeks might be an integral part to the recovery of DRM, but that efforts are stalled until an agreement can be reached between the Service and local communities (DEA 5.2(114-115)). Determining the costs and benefits of repopulation efforts within these creeks might expedite such an agreement, if for instance, the benefits to the community outweigh the costs.

For example, it is thought that chlorine discharge from the Fort Clark Springs pool is a major cause of the extirpation of DRM from Las Moras Creek (DEA 2.2(61)). Given the likely benefits to DRM survival of repopulation efforts, it is important to evaluate the costs of rehabilitating Las Moras Creek. What would it cost: (1) To find an alternate place for Fort Clark Springs to discharge the chlorinated poolwater? (2) To treat the water before discharging it to the creek? (3) To use an alternative chemical less adverse to the DRM?

- 2) Voluntary conservation plans such as the City of Del Rio's Management Plan for San Felipe Creek and the San Felipe Country Club Management Plan should not be included in the economic baseline calculation for this analysis. Due to the voluntary nature of these plans, the water quality protection measures described are not guaranteed to occur. Indeed, two of five components of Del Rio's Management Plan have yet to be implemented or even funded (DEA 2.3(Exhibit 2-3)). As such, these voluntary measures might lower the perceived benefit to designating


critical habitat by guaranteeing conservation, which, in reality, may or may not occur.

Because of the inherent uncertainty in voluntary plans, we recommend the designation of critical habitat because a Section 7 adverse modification consultation will provide concrete time and procedural guidelines to prevent the imperilment of the DRM.

- 3) Despite the difficulty in determining how and to what extent groundwater extraction from the Edwards Aquifer affects the DRM, a Section 7 adverse modification consultation is still an important step in ultimately drawing reasonable conclusions. The Edwards Aquifer Authority has conducted some preliminary tests in Kinney County to better determine flow patterns within the Aquifer¹, therefore, the ability to ascertain adverse modification is likely to improve with additional studies.

The Greater Edwards Aquifer Alliance thanks the U.S. Fish and Wildlife Service for considering our recommendations.

Sincerely,



Annalisa Peace
GEAA Executive Director

Elyzabeth Earnley
GEAA Research Intern

¹ Personal communication with Terry Dudley, Program Manager for Environmental Protection at the Edwards Aquifer Authority, March 6, 2008.

