

What Changes to EAHCP Conservation Measures Should the Permit Renewal Process Consider?

The Permit Options Report presents recommended changes to consider for Conservation Measures. Please indicate if you agree with the change and why or why not.



Control recreational use and public access areas further in the San Marcos River during peak recreation periods.

Challenge: Recreational use of the San Marcos River has intensified and is likely to continue to grow, which is likely to increase impacts on aquatic habitats, including an increase in litter.

Rationale for Change: To address this concern, the Permittees should consider adopting more stringent measures to limit the number of recreational users in the San Marcos River.

YES

NO

WHY?

Revise dissolved oxygen management as a Conservation Measure.

Challenge: During implementation of measures to increase dissolved oxygen in Landa Lake, the City of New Braunfels found that artificial aeration was ineffective for managing dissolved oxygen levels.

Rationale for Change: This measure should be revised based on information gained through implementation to explore other means of enhancing dissolved oxygen apart from artificial aeration.

YES

NO

WHY?

Establish clear targets or standards for control of non-native animal species.

Challenge: The EAHCP is not specific in identifying methods by which control of non-native animal species can occur, and this conservation measure is not linked to a biological objective for covered species, so there is not an objective way for the Permittees to evaluate how much effort or funding to spend towards implementing it.

Rationale for Change: Establishing clear targets or standards, linked to biological objectives and effectiveness monitoring, would allow the Permittees to gauge the success of the program, and to align the program with the EAHCP's biological goals and adaptive management program.

YES

NO

WHY?

Revise the Conservation Measure to reduce gill parasites.

Challenge: Measures to reduce gill parasites have been unsuccessful due to the abundance of host snails. The control and full removal of the host snails is unattainable.

Rationale for Change: This measure should be revised to identify gill parasite monitoring and management actions that are feasible to implement.

YES

NO

WHY?

Establish performance standards for riparian restoration.

Challenge: The EAHCP includes a Conservation Measure to enhance riparian areas by stabilizing eroded banks and planting plants that filter run-off. However, the EAHCP lacks clear objectives for evaluating riparian restoration.

Rationale for Change: Establishing performance standards, linked to biological objectives and effectiveness monitoring, would allow the Permittees to gauge the success of the program and to align the program with the EAHCP's biological goals and adaptive management.

YES

NO

WHY?

Extend ASR and VISPO groundwater leases and lease options (i.e., forbearance agreements) beyond the permit term expiration of 2028.

Challenge: All leases and lease options for groundwater will expire on or before March 31, 2028, when the EAHCP permit term expires, creating uncertainty in the long-term commitments to these programs beyond the current permit term.

Rationale for Change: Establishing bridge agreements extending beyond the current permit term, with contingencies based on the renewal of the EAHCP, would allow for the stability of these programs through the end of the permit term and into the renewed permit term.

YES

NO

WHY?

Increase flexibility of the EAHCP to achieve springflow protection through additional water conservation programs or securing new sources of supply.

Challenge: Springflow protection programs and measures have been successfully implemented in Phase I of the EAHCP; however, they are all complete or mature, and no longer augmenting the EAA's groundwater reserve.

Rationale for Change: Permittees should be incentivized to ensure groundwater protection any way they can, not just under the current tools identified in the EAHCP. Ongoing water conservation programs could be incorporated to increase assurances of success. EAA could explore other water supplies to increase security of meeting minimum springflows.

YES

NO

WHY?

Combine the triggers and payment structure of the two groundwater forbearance programs currently in the EAHCP into one program with the same pumping reduction target of 90,000 acre-feet per year in a drought of record.

Challenge: The two groundwater forbearance programs are more similar than envisioned, which results in competition between the two programs for the same groundwater leases and options.

Rationale for Change: So long as the anticipated effects on springflow of a combined program are the same or better, combining the two programs would increase flexibility to meet the HCP requirements and simplify administration and simplify the message to existing and potential program enrollees.

YES

NO

WHY?

Add flexibility to the groundwater rights purchase programs to allow the EAA to purchase water rights instead of only allowing term leases or lease options.

Challenge: The EAA has renegotiated lease terms more frequently than anticipated because lease term options were reduced due to drought conditions and amendments designed to create more programmatic efficiency, resulting in increased administrative costs, less financial certainty, and less security in the total water forborne under these programs.

Rationale for Change: Creating programs to allow flexibility in how water rights are controlled, instead of limiting control through leasing, would remove some administrative burden of frequently negotiating leases and increasing water supply security during drought conditions.

YES

NO

WHY?

