

Simple Preliminary Cost Estimates for SEP-HCP Implementation
based on BAT recommendations for GCW, BCV, and karst mitigation measures

	10% Participation			30% Participation			50% Participation		
	Take (ac)	Mitigation (ac)	30-yr Cost	Take (ac)	Mitigation (ac)	30-yr Cost	Take (ac)	Mitigation (ac)	30-yr Cost
GCW									
- Bexar	1,529	3,439	\$131,976,716	4,586	10,317	\$395,930,149	7,643	17,196	\$659,883,582
- Other	1,806	7,191	\$ 15,111,047	5,419	21,572	\$ 45,333,140	9,032	35,953	\$ 75,555,233
BCV	870	2,174	\$ 4,568,120	2,609	6,521	\$ 13,704,360	4,348	10,869	\$ 22,840,600
Karst	?	1,200	\$ 76,750,171	?	1,200	\$ 76,750,171	?	2,400	\$153,500,342
Total		14,004	\$228,406,054		39,611	\$531,717,820		66,418	\$911,779,757

BASELINE NUMBERS

Note: GCW habitat estimates, cave abundance, land development projections, and estimates of habitat loss may be revised and are subject to change.

Golden-cheeked Warbler

Geographic Area	Available Habitat (Model C2LOD ca. 2005)	New Development 2010 - 2040 (W. Davis Sept 27b revision)	Estimated Habitat Loss (2010 - 2040)
Bexar County	59,300	91,147	15,285
Other Plan Area Counties <i>(not including Comal County)</i>	504,128	97,694	18,063
Total <i>(not including Comal County)</i>	563,428	188,841	33,348

Black-capped Vireo

Geographic Area	Available Habitat (Wilkins et al.)	New Development 2010 - 2040 (W. Davis Sept 27b revision)	Estimated Habitat Loss (2010 - 2040)
Plan Area <i>(not including Comal County)</i>	178,039	188,843	8,695

Bexar County Karst Invertebrate Habitat

Area of Karst Zones 1 - 4 <i>(mostly in Bexar County, with small part in Medina and Bandera counties)</i>	289,981 ac
Approximate Number of Species' Caves <i>(based on analysis of cave data from Camp Bullis, Texas Speleological Society, and Zara Environmental)</i>	610 caves
Estimated Number of Species Caves Affected by Development (2010 - 2040)	65 caves

Land Acquisition Costs

Note: Per acre land costs are adjusted to account for a mix of conservation easements and fee simple acquisitions. Land costs are assumed to increase by 2% annually over 30 years.

Geographic Area	Base Year Cost (2010)	Final Year Cost (2040)	Mid-Point Cost
Bexar County and 5-mile Buffer - Acreage Tracts	\$ 21,000	\$ 38,039	\$ 29,519
Bexar County - Small Parcels	\$ 35,000	\$ 63,398	\$ 49,199
Outside Bexar County	\$ 1,150	\$ 2,083	\$ 1,617

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PRELIMINARY SEP-HCP COSTS - 10% PARTICIPATION RATE

Very simple cost estimate for implementation of the SEP-HCP, based on the BAT recommendations for the GCW, BCV and karst conservation measures. Assumes the Plan will cover **10% of the estimated habitat loss** for GCW and BCV. Assumes the Plan achieves **1/2 of the karst conservation goals** recommended by the BAT. Management and administration costs assumed to be 30% of the land acquisition cost.

Golden-cheeked Warbler

BAT recommendation for 3:1 mitigation for take in Bexar County and 2:1 mitigation for take outside of Bexar County. 60% of the mitigation for Bexar County take must be located within Bexar County or within 5 miles of the County (categorized below as within Bexar County) and 40% of the mitigation may be located in other Plan Area counties. 100% of the mitigation for take occurring outside of Bexar County may be located outside of Bexar County. Corresponding mitigation acres include an extra 25%, to account for a some areas of non-habitat within acquired preserves.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres (including addl. 25% non-habitat buffer)	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Bexar County	15,285	10%	1,529	3,439	\$ 29,519	\$ 101,520,551	\$ 30,456,165	\$ 131,976,716
Other Plan Area Counties	18,063	10%	1,806	7,191	\$ 1,617	\$ 11,623,882	\$ 3,487,165	\$ 15,111,047
Total	33,348	10%	3,335	10,630		\$ 113,144,433	\$ 33,943,330	\$ 147,087,763

Note: Estimates for habitat loss and incidental take coverage do not include Comal County.

Black-capped Vireo

BAT recommendation for 2:1 mitigation for take across the Plan Area. Mitigation may be located anywhere within the Plan Area, with a preference for lands in the western portion of the Plan Area. Corresponding mitigation acres include an extra 25%, to account for a some areas of non-habitat within acquired preserves.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres (including addl. 25% non-habitat buffer)	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Plan Area Counties	8,695	10%	870	2,174	\$ 1,617	\$ 3,513,938	\$ 1,054,182	\$ 4,568,120

Note: Estimates for habitat loss and incidental take coverage do not include Comal County.

Karst Species

BAT recommended creation of at least 1 high quality karst preserve (approx. 90 acres) and 2 medium quality karst preserves (40 to 60 acres each) in each of 6 Karst Faunal Regions, before take may be authorized in any particular region. Estimated herein as approximately 200 acres of karst preserves per region.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Bexar County	-	-	-	1,200	\$ 49,199	\$ 59,038,593	\$ 17,711,578	\$ 76,750,171

TOTAL ESTIMATED PLAN COST **\$ 228,406,054**

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PRELIMINARY SEP-HCP COSTS - 30% PARTICIPATION RATE

Very simple cost estimate for implementation of the SEP-HCP, based on the BAT recommendations for the GCW, BCV and karst conservation measures. Assumes the Plan will cover **30% of the estimated habitat loss** for GCW and BCV. Assumes the Plan achieves **1/2 of the karst conservation goals** recommended by the BAT. Management and administration costs assumed to be 30% of the land acquisition cost.

Golden-cheeked Warbler

BAT recommendation for 3:1 mitigation for take in Bexar County and 2:1 mitigation for take outside of Bexar County. 60% of the mitigation for Bexar County take must be located within Bexar County or within 5 miles of the County (categorized below as within Bexar County) and 40% of the mitigation may be located in other Plan Area counties. 100% of the mitigation for take occurring outside of Bexar County may be located outside of Bexar County. Corresponding mitigation acres include an extra 25%, to account for a some areas of non-habitat within acquired preserves.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres (including addl. 25% non-habitat buffer)	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Bexar County	15,285	30%	4,586	10,317	\$ 29,519	\$ 304,561,653	\$ 91,368,496	\$ 395,930,149
Other Plan Area Counties	18,063	30%	5,419	21,572	\$ 1,617	\$ 34,871,646	\$ 10,461,494	\$ 45,333,140
Total	33,348	30%	10,004	31,889		\$ 339,433,299	\$ 101,829,990	\$ 441,263,289

Note: Estimates for habitat loss and incidental take coverage do not include Comal County.

Black-capped Vireo

BAT recommendation for 2:1 mitigation for take across the Plan Area. Mitigation may be located anywhere within the Plan Area, with a preference for lands in the western portion of the Plan Area. Corresponding mitigation acres include an extra 25%, to account for a some areas of non-habitat within acquired preserves.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres (including addl. 25% non-habitat buffer)	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Plan Area Counties	8,695	30%	2,609	6,521	\$ 1,617	\$ 10,541,815	\$ 3,162,545	\$ 13,704,360

Note: Estimates for habitat loss and incidental take coverage do not include Comal County.

Karst Species

BAT recommended creation of at least 1 high quality karst preserve (approx. 90 acres) and 2 medium quality karst preserves (40 to 60 acres each) in each of 6 Karst Faunal Regions, before take may be authorized in any particular region. Estimated herein as approximately 200 acres of karst preserves per region.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Bexar County	-	-	-	1,200	\$ 49,199	\$ 59,038,593	\$ 17,711,578	\$ 76,750,171

TOTAL ESTIMATED PLAN COST **\$ 531,717,820**

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PRELIMINARY SEP-HCP COSTS - 50% PARTICIPATION RATE

Very simple cost estimate for implementation of the SEP-HCP, based on the BAT recommendations for the GCW, BCV and karst conservation measures. Assumes the Plan will cover **50% of the estimated habitat loss** for GCW and BCV. Assumes the Plan achieves **100% of the karst conservation goals** recommended by the BAT. Management and administration costs assumed to be 30% of the land acquisition cost.

Golden-cheeked Warbler

BAT recommendation for 3:1 mitigation for take in Bexar County and 2:1 mitigation for take outside of Bexar County. 60% of the mitigation for Bexar County take must be located within Bexar County or within 5 miles of the County (categorized below as within Bexar County) and 40% of the mitigation may be located in other Plan Area counties. 100% of the mitigation for take occurring outside of Bexar County may be located outside of Bexar County. Corresponding mitigation acres include an extra 25%, to account for a some areas of non-habitat within acquired preserves.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres (including addl. 25% non-habitat buffer)	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Bexar County	15,285	0.5	7,643	17,196	\$ 29,519	\$ 507,602,755	\$ 152,280,827	\$ 659,883,582
Other Plan Area Counties	18,063	0.5	9,032	35,953	\$ 1,617	\$ 58,119,410	\$ 17,435,823	\$ 75,555,233
Total	33,348		16,674	53,149		\$ 565,722,165	\$ 169,716,649	\$ 735,438,814

Note: Estimates for habitat loss and incidental take coverage do not include Comal County.

Black-capped Vireo

BAT recommendation for 2:1 mitigation for take across the Plan Area. Mitigation may be located anywhere within the Plan Area, with a preference for lands in the western portion of the Plan Area. Corresponding mitigation acres include an extra 25%, to account for a some areas of non-habitat within acquired preserves.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres (including addl. 25% non-habitat buffer)	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Plan Area Counties	8,695	0.5	4,348	10,869	\$ 1,617	\$ 17,569,692	\$ 5,270,908	\$ 22,840,600

Note: Estimates for habitat loss and incidental take coverage do not include Comal County.

Karst Species

BAT recommended creation of at least 2 high quality karst preserve (approx. 90 acres) and 4 medium quality karst preserves (40 to 60 acres each) in each of 6 Karst Faunal Regions, as the recommended karst conservation goal. Estimated herein as approximately 400 acres of karst preserves per region.

Geographic Area	Estimated Habitat Loss	Participation Rate	Incidental Take Coverage (acres of habitat loss)	Mitigation Acres	Mid-Point Per Acre Land Costs	Estimated Total Acquisition Costs	Estimated Management and Administration Costs (assumed as 30% of acquisition costs)	Estimated Total Cost of Plan
Bexar County	-	-	-	2,400	\$ 49,199	\$ 118,077,187	\$ 35,423,156	\$ 153,500,342

TOTAL ESTIMATED PLAN COST **\$ 911,779,757**

Task list and estimated schedule: Southern Edwards Plateau Habitat Conservation Plan.

Phase	Task	Description/Subtasks	Estimated/ Actual End Date
PHASE 1: PROJECT FOUNDATIONS			11/1/2010
	Task 1:	Contracting & Early Coordination	5/1/2010
	Task 2:	Project Planning	1/19/2010
	Task 3:	Coordination, Outreach, and Information Sharing	4/15/2010
	Task 4:	Committee Formation	1/29/2010
	Task 5:	Baseline Resources Assessment	7/1/2010
	Task 6:	Preliminary Impacts Assessment	11/1/2010
PHASE 2: CONCEPTUAL DESIGN AND ALTERNATIVES DEVELOPMENT			12/31/2010
	Task 7:	Develop Alternatives for HCP Scope	7/1/2010
	Task 8:	Develop Alternatives for HCP Conservation Strategy	10/1/2010
	Task 9:	Develop Alternatives for HCP Funding Plan	11/1/2010
	Task 10:	Identify Preferred HCP Framework and Feasible Alternatives	12/31/2010
PHASE 3: PREPARE AND SUBMIT PERMIT APPLICATION PACKAGE			9/1/2011
	Task 11:	NEPA Notice of Intent and Public Scoping Process	2/14/2011
	Task 12:	Prepare First Draft SEPHCP	4/1/2011
	Task 13:	Review and Comment on First Draft SEPHCP	6/1/2011
	Task 14:	Prepare Second Draft SEPHCP	9/1/2011
	Task 15:	Prepare Preliminary Draft EIS	8/1/2011
	Task 16:	County Approval and Submittal of Application Package	9/15/2010
PHASE 4: POST-APPLICATION PROCESSING AND PERMIT ISSUANCE			9/12/2012
	Task 17:	Local USFWS Office Completeness Review	12/1/2011
	Task 18:	Public Hearing and Comment	1/24/2012
	Task 19:	Finalize SEPHCP and EIS	7/15/2012
	Task 20:	USFWS Permit Issuance	9/12/2012

December 6, 2010

Southern Edwards Plateau Habitat Conservation Plan
c/o Andrew Winter
Bexar County Environmental Engineer
233 N. Pecos
San Antonio, Texas 78207

Re: Exclusion from plan area

Dear Mr. Winter:

Please remove Whiskey Ridge Ranches subdivision from your expanded Southern Edwards Plateau Habitat Conservation Plan (SEPHCP) area.

We had no reason to object to your original HCP plan area because our subdivision was not included. You have recently elected to expand the HCP to encompass all seven counties in their entirety, we are now included and thereby object.

Whiskey Ridge Ranches is about 1000 acres, comprised of seventeen landowners. Our subdivision is in Kerr County and in the Extraterritorial Jurisdiction of the city of Kerrville. A plat map can be found in the Kerr County deed records. This area is precluded from future development by virtue of recorded deed restrictions and bylaws. We have been cooperating with Texas Parks & Wildlife for about eighteen years and have good awareness of our wildlife habitat, including endangered species habitat. We have an active and ongoing Wildlife Conservation Plan in effect. Your stated plan to streamline ESA compliance has no relevance for our protected area. In fact, the unintended consequences of your actions will be to streamline the taking of our habitat by condemning authorities (U.S., state, county, city, interstate pipelines for natural gas, gasoline, oil, etc.) Currently, we are in the path of one of the routes of LCRA for a right-of-way for an enormous CREZ transmission line. If you will review recent LCRA testimony at the Texas Public Utilities Commission you will see that any HCP in place would make their condemnation process much easier. Without an HCP, our property rights are stronger, and we can have input in the process. In other words, your streamlining equates to a loss of property rights we now enjoy.

You have not included a real estate professional in your (SEPHCP) process. Therefore, no one has stood up for or voiced concern over landowner property rights. There is nothing voluntary about this HCP when a condemning authority wants to destroy our endangered species habitat. To repeat, your HCP diminishes the property rights we now enjoy.

Please remove Whiskey Ridge Ranches subdivision from the SEPHCP at your earliest convenience. Should you have any questions you may call any of us at the telephone numbers noted below.

Sincerely,

Designees for Whiskey Ridge Ranches:



Jerry Ahrens, Director (telephone 830-895-1061)



Ken Swanson, Director (telephone 830-895-3692)