From: David Pipes
To: info@sephcp.com;
Subject: First Draft
Date: Thursday, June 02, 2011 6:45:36 AM

Thanks for doing such due diligence. All in all this is well written and clear...I had some difficulty understanding what would happen if a community or county had an existing conservation or management plan in place...What might happen when they overlap? For ex: The Watershed Protection Plan for the Upper Cibolo Creek will be presenting BMP's for landowners
on the Creek...
Thanks,
David Pipes

Clif Ladd

From: Gregory Pasztor [gpasztor@mac.com]
Sent: Friday, June 10, 2011 2:16 AM
To: info@sephcp.com
Subject: Comments-First Draft SEP-HCP

Comments on First Draft, Southern Edwards Plateau Habitat Conservation Plan

Bexar Audubon Society, representing some 1,600 residents of Bexar, Comal, Guadalupe, Kendall, Bandera, Wilson, Atascosa and Medina counties, supports the SEP-HCP as drafted. Though endangered species habitat will be lost, particularly in suburban areas, the overall effect of the plan will be to give the GCW and BCV a chance at long term survival through mitigated lands. With taxpayers chipping in 49% of the costs, developers should have nothing to complain about. The success of previous HCP's, such as the Balcones Canyonlands Conservation Plan, further support the need for such a plan on the Southern Edwards Plateau. The Plan is thorough, well-documented, and reflects the hard work and dedication of individuals from all viewpoints.

Sincerely,

Gregory Pasztor, President,

on behalf of the

Board of Directors, Bexar Audubon Society

Clif Ladd

From: Winter, Andrew [awinter@bexar.org]
Sent: Friday, June 10, 2011 11:46 AM
To: Amanda Aurora; Clif Ladd
Subject: Fwd: Draft SEP-HCP

Sent from my phone

Begin forwarded message:

> **From:** "John R. Hoyt" <jhoyt@edwardsaquifer.org>
> **Date:** June 10, 2011 11:30:17 AM CDT
> **To:** "Winter, Andrew" <awinter@bexar.org>
> **Subject: Draft SEP-HCP**
>
> Andy:
>
> Sorry for the late reply. I have looked over the draft SEP-HCP and find no items on which I feel I need to comment. The geo and karst references look fine to me, as I expected considering your geo and karst consultant. I found the draft very informative as the subject is outside of the list of topics I normally encounter. I hope all goes as planned with the HCP implementation in that properties that meet the criteria for preservation will also typically benefit Edwards Aquifer water quality and water quantity.
>
> Thanks for the opportunity to review the draft document. Let me know if you need anything else from EAA.
>
> John R. Hoyt, P.G.
>
> Assistant General Manager - Aquifer Management
>
> Edwards Aquifer Authority
>
> Office Phone: (210) 477-5136
>
> e-mail: jhoyt@edwardsaquifer.org

Clif Ladd

From: Kemble White [kwhite@swca.com]
Sent: Friday, June 10, 2011 5:46 PM
To: info@sephcp.com
Subject: Draft SEP HCP

To whom it may concern.

The Endangered Species Act requires that the USFWS base its actions on analysis of the best available scientific and commercial information. The draft SEP HCP has not attained that standard with respect to the endangered karst invertebrates. Specifically, the take/mitigation analysis and restrictions in the participation process are based on the Karst Fauna Region biogeographic hypothesis, a nearly twenty-year-old concept which has been tested in the scientific literature and found to be flawed and no longer supported by the preponderance of available data.

Since 1999 I have worked actively as a consultant and as a researcher on issues related to the Edwards Aquifer and endangered karst invertebrates in central Texas. I am a member of the karst invertebrate recovery team, a licensed professional geoscientist and was one of the primary authors of the karst invertebrate sections of the Williamson County RHCP which was approved by the Service in 2008. My dissertation and a resulting article in *Geology* in 2009 established the phylogeography of Bexar County *Cicurina* cave spiders in the peer-reviewed scientific literature. I believe that my work has yielded a fundamental conservation benefit to the species (especially *Cicurina madla*) with specific implications for recovery. As such I was dismayed to find that the Draft RHCP and its supporting materials completely ignore the most relevant peer-reviewed science on the *Cicurina*, which include four of the nine listed Bexar County karst invertebrates. I believe that this was a willful omission intended to suppress data that clearly demonstrate shortcomings in the recovery strategy in the Draft Recovery Plan for the Bexar County invertebrates (and incorporated into the SEP HCP). The Service and the authors of the karst section of the SEP HCP are well aware of the problems with the KFR hypothesis. Failure to disclose the nature, or even existence of, the scientific debate regarding the Karst Fauna Region biogeographic hypothesis is unethical and contrary to the basic information quality guidelines set forth under the Data Quality Act, the related Office of Management and Budget guidelines,[2] and the recently updated (1/28/08) Fish and Wildlife Service General Administration Part 212 Ethics Code (especially Chapter 7, Scientific Code of Professional Conduct of the Service).

Texas cave science has suffered from a failure of certain local researchers to reach out to the broader scientific community and incorporate new ideas and perspectives. This draft continues that unfortunate self-serving trend. This is inconsistent with the Data Quality Act, and I believe that this may be in violation of Part 212 of the Fish and Wildlife Service Manual, which states that Service personnel should:

· Act impartially and not give preferential treatment to any private organization or individual. (Section 1.8 H)

· Act to advance science and produce the highest quality and most reliable scientific information for the Service. (Section 7.6 A)

· Treat colleagues, other scientists and professional contacts, and the public respectfully. (Section 7.6 C)

· Place reliability and objectivity of scientific activities, reporting, and application of scientific results ahead of personal gain or allegiance to individuals and

organizations. (Section 7.6 D)

· Acknowledge the ideas and work of others, take care to avoid misrepresentation,

and respect the intellectual property rights of others. (Section 7.6 E)

· Welcome constructive criticisms of their scientific activities. (Section 7.8 A)

· Provide relevant contractors and volunteers working on behalf of the Service with

a copy of this policy and assist them to conduct their scientific activities in

accordance with it. (Section 7.10 E)

[2] Office of Management and Budget Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies. Republication: Federal Register Vol. 67, No. 36, p. 8452.

The next draft of the SEP HCP should disclose controversial nature of the KFR hypothesis and cite sources that are currently suppressed. New distribution data for listed and non-listed invertebrates, evolving systematics, and phylogeographic studies continue to trending strongly away from the tenets of the original KFR hypothesis. The authors and the Service need to consider how take/mitigation calculations and the participation process might need to change now and over time in response to these trends in the best available scientific information.

Thank you for your consideration and please do not hesitate to contact me with any questions or comments,

Kemble White Ph.D., P.G.

Suppressed publications include:

White, K., Carothers, S.W., and Berkhouse, C. 2001. The Karst Fauna Region concept

and implications for endangered karst invertebrate recovery in Bexar County,

Texas. Pp. 148–153 *in* Proceedings of the 2001 National Cave and Karst

Management Symposium, Tucson Arizona.

White, K. 2006. Paleohydrology of the Edwards Aquifer karst and the evolution of rare and endangered *Cicurina* cave spiders, south-central Texas. University of Mississippi Dissertation. Oxford, Mississippi. Chapter 4: Management and Recovery Implications of the First Molecular Taxonomy Study of Rare and Endangered Cave Adapted Invertebrates in Bexar County, Texas.

White, K., Davidson, R.D., and Paquin, P. 2009. Hydrologic evolution of the Edwards Aquifer recharge zone (Balcones fault zone) as recorded in the DNA of eyeless *Cicurina* cave spiders, south-central Texas. Geology 37(4):339–342.

Kemble White, Ph.D., P.G.

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Clif Ladd

From: Ken Diehl [Ken.Diehl@saws.org]
Sent: Friday, June 10, 2011 10:31 AM
To: info@sephcp.com
Cc: Scott Halty; Michael Barr
Subject: draft SEP-HCP Comments

The Southern Edwards Plateau Habitat Conservation Plan (SEP-HCP) is an effort by Bexar County, Texas and the City of San Antonio to address endangered species issues that are threatening the economic growth of the region and to promote the conservation of these species and applauds the effort. SAWS has not obtained Board direction on whether we would voluntarily enroll in the Plan for the purposes of obtaining authorization for the incidental taking of a covered species.

Understanding that numerous stakeholder concerns have been identified, at this time, SAWS does not have any comments on the specific details contained in the first draft version (dated 4/1/2011) SEP-HCP. SAWS will continue to monitor the SEP-HCPs progress and support the overall approach and intent. Thanks.

Ken Diehl, Environmental Protection Specialist IV
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San Antonio Water System
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Clif Ladd

From: Steven Shepard [sbtdesigns@yahoo.com]
Sent: Sunday, June 12, 2011 11:46 AM
To: info@sephcp.com
Subject: Comment

It is with some satisfaction that I read in the Sunday Express News that counties bordering Bexar County rejected Bexar County's version of a habitat protection plan. I applaude and endorse their rejection. There is no reason for our neigboring counties to trust or accept Bexar County's version of anything regarding the Hill Country habitat. The developers located in Bexar County and San Antonio continue to cast greedy intentions towards the Hill County and the only thing they have in mind is exploiting the territory for profit. The most recent evidence of developer bad intention is The Greater San Antonio Building Association's sponsorship of clear cutting legislation in the most recent state legislative session. This bill would have allowed developers and builders to shave the land of all trees and other natural sights in order to build houses and other structures. Thankfully the clear cutting bill failed to pass. However any limits imposed upon developers at this time is only as good as the law and courts make those limits. What has gone on in Bexar County for decades is the developers and builders have bought their way through local politicians and enforcement agencies and they have pretty much had their way in Bexar County. In the past San Antonio mayors have made the suggestion that San Antonio annex the entire county. San Antonio's history is to be wasteful with natural resources like land, water and wildlife. With these wasteful habits San Antonio has become a major urban center that threatens rural residents and the surrounding natural environment. It should be assumed that any environmental habitat coming out of Bexar County favors developement, exploitation and ruin of Hill Country natural environment. Our neighboring counties are correct and right to reject any proposal from Bexar County and they need to do everything they can and should to protect the Hill Country habitat. We do not need the Hill Country to look like San Antonio.

Steven Shepard
1141 N Loop 1604
San Antonio, Texas 78232

Comments on 4/1/11 Draft of the Southern Edwards Plateau Habitat Conservation Plan
Submitted 6/10/11

Tom Hayes, Ph.D.
Executive Director
Environmental Conservation Alliance

Office/Cell: 512.439.9597
Email: Tom@ECAscience.org
Address: P.O. Box 685039, Austin, TX 78768

Introduction:
Environmental Conservation Alliance (ECA) is a nonprofit corporation based in Austin, Texas. The mission of ECA is to provide scientific and technical services to conserve water resources, biodiversity, and ecosystems; and to promote responsible urban and rural development. A primary service area of ECA is the Texas Hill Country.

The ECA Executive Director (Dr. Hayes) previously submitted most the following comments as a member of the Biological Advisory Team (BAT) for the Southern Edwards Plateau Habitat Conservation Plan (SEPHCP). However, these comments are included below, so that ECA may continue to contribute to the SEPHCP process as an independent organization.

A significant change in these comments compared to those submitted through the BAT is the recommendation that the SEPHCP add minimum preserve design criteria, as described in Item 17 below. Item 18d is also amended to estimate minimum mitigation in and adjacent to Bexar County for 7,500 acres of requested GCW take in Bexar County.

General:
1. We recommend that the SEPHCP administrator be an independent non-profit entity, affiliated with but not directly managed by either Bexar County or the City of San Antonio.

2. A new section needs to be inserted following Section 8 of the SEPHCP, which describes the voluntary conservation program (outreach, education, research, etc.) for Category 3 species. Conservation measures for these species are currently excluded from the SEPHCP.

3. Assessments of offsite, indirect, and cumulative impacts are cursory. The SEPHCP appears to offer coverage for incidental take only to activities inside the Project Area. The mitigation process for indirect and offsite impacts needs to be included in the SEPHCP.

4. The SEPHCP should establish the structure to receive technical and public input to inform the Adaptive Management strategy. Due to the significant involvement of affected communities and public funding, post-issuance advisory committees with public meetings should be required, including a Science Advisory Committee and a Citizens Advisory Committee.

5. Under Covered Activities, the proposed “temporary take” during land management should be described in further detail, including specific requirements to strictly avoid or at least minimize, and fully mitigate, such take.

6. None of the proposals should be allowed, which exclude Project Areas from mitigation based on abbreviated presence-absence surveys for covered species. Such surveys, which if allowed

would likely become the common approach, deviate from standard Service recommendations and may jeopardize the repeatability and validity of mitigation determinations. Abbreviated presence-absence surveys for covered species are biologically unacceptable, and current Service recommendations should be required instead.

6a. The proposed shortcut karst-invertebrate surveys of voids discovered during construction include five surveys during one week. Such activities are unlikely to accurately assess presence-absence of covered species and may well cause harm to the species due to habitat disturbance. The current Service recommendations should be required.

6b. The proposal for one year of GCW surveys, to determine presence-absence and therefore mitigation requirements, is significantly less effort than the current Service recommendation of three years of surveys. Due to seasonal and annual variations in precipitation, vegetation, and other important habitat variables, the current Service recommendation should remain the basis for determining presence-absence.

Karst Inverts:
7. All karst applications within Karst Zones 1-4 should require a complete and certified hydrogeological survey.

8. In and within 300 feet of the Project Area, "Occupied Cave Zone" should be defined as sum total of all areas that are within 345 feet of a feature footprint and the surface and subsurface watersheds for that feature. No optional definition should be allowed.

8a. Accordingly, Cave Zones A and B should be defined as follows. Cave Zone A: sum total of 150-foot buffer and surface drainage basin. Cave Zone B: sum total of 345-foot buffer and subsurface drainage basin.

9. For participation in the SEPHCP, we recommend that karst preserves established by non-SEPHCP entities have permanent protection transferred to the SEPHCP, in order to be counted as contributing to Conservation Levels for a species.

10. Special conditions for void surveys should be required for all karst coverage regardless of Conservation Level.

11. Due to the paucity of distribution and taxonomic data and the continuing need for research on species status, the required investigation of accidently discovered caves and voids should remain in place until all listed species in all KFRs in the SEPHCP region achieve actual downlisting by the Service.

12. No covered activities for a given species should be allowed within the Occupied Cave Zone (as defined in Item 8), until all KFRs for that particular species achieve downlist criteria to assure regional recovery.

13. In light of the lack of definitive information regarding species distributions, genetics, and status, participation limits in the karst program should remain in place until regional downlisting criteria are met for all covered karst-invertebrate species.

14. Karst mitigation fees appear too low considering the high biological concern and high land values (conservation cost) in Bexar County. Also, the SEPHCP needs to define what happens when multiple projects impact Zones A and/or B of the same occupied cave.

We recommend a more appropriate fee structure of:

- Karst Zone 1 and 2, but outside Occupied Cave Zone and Critical Habitat Unit: $1000/ac
- Occupied Cave Zone B (redefined as above): $100,000/cave
- Occupied Cave Zone A (redefined as above): $1,000,000/cave

15. We recommend that low-quality preserves are not accepted in lieu of per acre participation fees, unless perpetual management expenses are included as an endowment for such donations, to avoid impact to acquisition and management funding of medium and high quality karst preserves. In any case, due to low biological value and low sustainability, low-quality preserves should not be considered when examining the current Conservation Level for a karst species.

16. In the SEPHCP, the search for new localities of rare karst species currently focuses on existing conservation (managed) areas. However, we urge that these investigations give equal attention to urban, suburban, and developing areas, including private lands, to assess status and risk factors important to adaptive management and emerging protection needs.

GCW and BCV:

17. The SEPHCP should include minimum preserve design criteria for all covered species. The Balcones Canyonlands Preserve HCP and FEIS (BCP-HCP/FEIS; City of Austin and Travis County, Texas; 1996) provides guidelines, which are applicable to the SEPHCP. Though most directly applicable to preserve design for GCW, these minimum preserve requirements may be scaled down to address similar design criteria for BCV preserves.

The BCP-HCP/FEIS includes preserve clusters arranged as ten macrosites, with macrosites varying widely in size up to 103,500 acres. Minimum preserve requirements vary from macrosite to macrosite, and for each preserve within a given macrosite. However, these requirements are generally consistent and may be summarized as follows:

Preserve Size: The minimum number of contiguous acres per preserve unit ranges from 3,000 to 7,700 acres.

Edge to Area Ratio: The edge to area ratio is the most consistent requirement of the BCP-HCP/FEIS, and for most macrosites (Bull Creek, Cypress Creek, North Lake Austin, South Lake Austin, and Barton Creek) no more than 20% of the minimum preserve area can be within 300 feet of the preserve perimeter.

Preserve Connectivity: The maximum distance between preserve units within a macrosite is typically 0.50-0.75 miles, though in special circumstances this may extend to 3.5 miles.

Preserve Width: The minimum width of individual preserve units is about one mile (3,000 to 8,000 feet).

The SEPHCP should specify minimum design criteria for each of the above four metrics.

18. We recommend that the following SEPHCP-BAT recommendations be incorporated in the SEPHCP regarding take and mitigation for GCW and BCV:

18a. GCW

Reduce the requested amount of take to 7500 acres; an additional take of 4500 acres may be requested only after the 6 counties not currently participating come into the plan. The reduction in requested take is necessary because otherwise all 12,000 acres of the take could essentially happen in Bexar County, and this is biologically unacceptable.

Using an existing model (such as Model C 2010 or TAMU model), create a map of the entire plan area that shows all GCW habitat. Use this map and the criteria of habitat patch size and quality to determine mitigation ratio for direct impact. Best habitat will be mitigated at 3:1, medium at 2:1, and lowest at 1:1 throughout the plan area. For example, if habitat patch size is $\geq$ 500 acres and is rank 3 or 4 in Model C2010, then it is categorized as the best habitat and will be mitigated at 3:1 (acres of mitigation:acres of take); $\geq$ 100 acres, but less than 500 acres and rank 3 or 4 will be mitigated at 2:1; <100 acres and any rank (1, 2, 3, or 4) will be mitigated at 1:1.

18b. BCV

Reduce requested take to 2500 acres; an additional take up to 1500 acres may be requested only after the 6 counties not currently participating come into the plan. The reduction in requested take is necessary because otherwise all of the take could essentially occur in Bexar County.

Mitigate at a ratio of 2:1 (acres of mitigation:acres of take) for direct impact throughout the plan area. The proposed ratio of 1:1 is biologically unacceptable.

18c. Since no other counties besides Bexar County are currently participating in the plan, the maximum amount of take should be 7500 GCW-ac & 2500 BCV-ac within the boundaries of Bexar County. Mitigation should occur only in Bexar County until other counties sign on as true participants (take and mitigation). Currently, Bexar County is targeted for all GCW and BCV take in the SEPHCP.

18d. If and when other counties do participate, the above maximum amounts of take (7500 GCW-ac & 2500 BCV-ac) should remain in place within Bexar County boundaries. The "adjacent sectors" should not be considered until those respective counties agree to participate. Mitigation for GCW and BCV incidental take should only occur in Bexar County

until other counties agree to participate (i.e., mitigate close to take). Once other counties are participants, then mitigation for take may occur in both Bexar County and within five miles of Bexar County in other participating counties, as long as there is a distance restriction like the original BAT recommendation regarding mitigation (60 % Bexar/40% other) for Bexar County take. For example, we recommend that minimum mitigation for 7,500 acres of requested GCW take in Bexar County remain approximately 11,000-15,000 acres in and within five miles of Bexar County.

19. Price of GCW and BCV credits should be increased (~$10,000/acre) in and adjacent to Bexar County, to be more commensurate with land values and, thus, allow adequate mitigation and meaningful contribution to recovery in this developing area.

20. Essentially none of the currently managed ("protected") GCW habitat in the SEPHCP area has any permanent protection, and therefore cannot be counted as progress towards regional recovery.

Additional Line-By-Line BAT-Member Comments on 4/1/11 Draft SEPHCP, 6/10/11			
Item	**Section**	**Subsection**	**Comment**
1	**3.2.2**		Here and throughout HCP, application assessments are restricted to within 300 feet of Project Area. What is scientific basis for using this distance, when impacts to Covered Species often extend beyond this distance?
2	**3.2.2**		All applications within Karst Zones 1-4 should require a complete and certified hydrogeological survey.
3	**3.2.2.1**		Here and elsewhere throughout the SEPHCP, the "Occupied Cave Zone" should be defined as sum total of all areas that are within 345 feet of a feature footprint and the surface and subsurface watersheds for that feature. This is also the recommendation of the SEPHCP-BAT karst subcommittee and important researchers such as George Veni.
4	**3.2.2.2**		These three paragraphs are contradictory, and should clarify that only activities inside the Project Area are covered for incidental take, and off-site impacts are not covered.
5	**3.2.2.3**	KARST BIOL. INFO.	Mesocavernous areas should be emphasized during karst surveys, in addition to caves, voids, and other features. Karst surface surveys during Step 1 should be by a certified hydrogeologist. In Step 4, any occupied feature mapping must include the full "Occupied Cave Zone", consisting of footprint, 150- and 345-foot buffers, and surface and subsurface watersheds.
6	**3.2.2.3**	KARST BIOL. INFO.	P. 37, paragraph 1: Rewrite to require maps of surface and subsurface drainage basins. Cave Zone A: sum total of 150-foot buffer and surface drainage basin. Cave Zone B: sum total of 345-foot buffer and subsurface drainage basin.
7	**3.2.3.1**	HABITAT IMPACT ASSESS.	Three years of GCW and BCV surveys performed according to standard FWS protocols should remain the basis of impact assessment for HCP participation.
8	**3.2.3.1**	MITIGATION RATIOS	Should follow BAT recommendations.
9	**3.2.3.2**	CATEGORIES OF COVERED ACTIVITIES	In and within 300 feet of the Project Area, "Occupied Cave Zone" should be defined as sum total of all areas that are within 345 feet of a feature footprint and the surface and subsurface watersheds for that feature. No optional definition.
10	**3.2.3.2**	ACTIVITIES ELIGIBLE FOR KARST COVERAGE	Only karst preserves established by non-SEPHCP entities, which have permanent protection transferred to the SEPHCP, may contribute to Conservation Levels for a species.
11	**3.2.3.2**	ACTIVITIES ELIGIBLE FOR KARST COVERAGE	Table 9: Special conditions for void surveys should be required prior to all karst coverage regardless of Conservation Level.
12	**3.2.4.1**	PURCHASE OF CONSERV. CREDITS	Price of GCW and BCV credits needs to be at least $10,000 per acre in and adjacent to Bexar County.
13	**3.2.4.2**	KARST PARTICIP. FEES	Table 10: Fees appear too low considering land values (conservation cost) in Bexar County. We recommend: Karst Zone 1: $2000/ac, Karst Zone 2: $1000/ac, Occupied Cave Zone B (redefined as above): $120,000/cave, Occupied Cave Zone A (redefined as above): $1,200,000/cave. Also, the SEPHCP needs to define what happens when multiple projects impact Zones A and/or B of the same cave.
14	**4.3.4**		Table 14: Essentially none of the currently managed ("protected") GCW habitat in the SEPHCP area has any permanent protection, and therefore cannot be counted as progress towards regional recovery.
15	**4.3.4**		Last paragraph of this section throws Bexar County and adjacent sectors "under the bus." Regional GCW recovery may well be prevented if the projected take in the critical Bexar County area proceeds without sufficient nearby mitigation, as proposed in the draft HCP.
16	**4.4.3**		P. 73, paragraph 2: No covered activities for a given species should be allowed within the Occupied Cave Zone (as defined in Item 3), until all KFRs for that particular species achieve downlist criteria to assure regional recovery.
17	**4.4.3**		P. 73, paragraph 4: Due to the lack of definitive information regarding species distributions, genetics, and status, participation limits in the karst program should remain in place until regional downlisting criteria are met for all covered karst-invertebrate species.
18	**4.4.3**		P. 74, paragraph 3: Due to the paucity of distribution and taxonomic information and the continuing need for research on species status, the required investigation of accidently discovered caves and voids should remain in place until all listed species in all KFRs in the SEPHCP region achieve actual downlisting by the Service.
19	**5.2.1**	OBJECTIVE 1	P. 80, Last paragraph: Here and throughout SEPHCP, existing managed areas should not be counted as contributing to regional recovery unless such areas have permanent protection for GCW as a deed restriction. Essentially no existing managed area in the SEPHCP region, including those managed by public agencies, currently have permanent protection for GCW.
20	**5.2.1**	OBJECTIVE 5	P. 82: Please refer to item # 8 in the narrative portion of these comments for recommended modifications to GCW take and mitigation. Briefly, we urge that GCW take be limited to 7500 acres in Bexar County, with all mitigation occurring in Bexar County until other counties commit to full participation (both take and mitigation) in the SEPHCP. Item # 8 provides additional important details.

Additional Line-By-Line BAT-Member Comments on 4/1/11 Draft SEPHCP, 6/10/11			
Item	**Section**	**Subsection**	**Comment**
22	**5.2.1**	OBJECTIVES 10-12	The SEPHCP currently specifies essentially no guidelines or measurable objectives for preserve management, protection, habitat enhancement, monitoring, etc. This information should be included for public review.
23	**5.2.2**	OBJECTIVE 3	Here and throughout the SEPHCP, the search for new localities of rare karst species focuses on existing conservation (managed) areas. However, these investigations should give equal attention to urban, suburban, and developing areas, including private lands, to assess status and risk factors important to adaptive management and emerging protection needs.
24	**6.3.3**		No conservation credits should be purchased or otherwise transferred to the SEPHCP from a third party, including third-party conservation banks, unless the SEPHCP is fully responsible for all ongoing management, monitoring, and research activities on such lands.
25	**7.2.1.1**		This same requirement for perpetual legal protection of karst preserves from land uses that adversely impact covered species should apply equally to all GCW and BCV preserves. To the maximum extent possible, additoinal conservation easements should be required for all mitigation preserves, including fee-simple parcels, with co-ownership of easements donated to state (TPWD) and federal (USFWS) conservation agencies to attain higher level protection. If preserves are adversely impacted by incompatible uses in the future, lost resource values should be fully replaced, including through additional land acquisition.
26	**7.2.1.2**		P. 96, Second to last paragraph: Low-quality preserves should not be accepted in lieu of per acre participation fees, unless perpetual management expenses are included as an endowment for such donations, to avoid impact to acquisition and management funding of medium and high quality karst preserves. In any case, due to low biological value and low sustainability, low-quality preserves should not be considered when examining the current Conservation Level for a karst species.
27	**7.2.2**		P. 96, Second paragraph: Inappropriate secondary uses of karst preserves (i.e., recreation, most agriculture, residential actives, utility and infrastructure corridors) should not be listed in the SEPHCP as available activities. The BAT only recommended low-impact research and educational uses as possible secondary uses, with the determination of compatible use to be on a case by case basis.
28	**8.1**		Baseline Preserve Assessments and Preserve Management Plans should be updated within five years of initial completion, then updated every 6-8 years thereafter, or more frequently as needed to address significant events. These documents should be subject to required review by the Service and by public advisory committees.
29	**8.1.4.2**		To obtain the best conservation oversight, we recommend that the SEPHCP Administrator be required to review its proposed monitoring methods with other biological experts including a mandatory scientific advisory committee.
30	**8.1.5**		Minimum requirements based on quantitative objectives should be specified for implementation of all proposed management and monitoring activities.
31	**8.1.5**		P. 106, third to last paragraph: The SEPHCP Administrator should be required to implement management and monitoring outside of SEPHCP preserves, including outreach and research, in order to assess and manage covered species and category-3 species.
32	**9.1**		No incidental take of covered karst species should be allowed prior to acquisition of preserves that serve as mitigation of such take.
33	**9.1**		Preserve management and monitoring should not depend on uncertain public revenue, but should instead be guaranteed as much as possible by the establishment of permanent endowments as added costs during every preserve acquisition.
34	**9.2**		Table 20: Allocating 89 % of SEPHCP implementation costs to preserve acquisition may jeopardize the sustainability of the SEPHCP. For example, permanent set asides for long-term management typically amount to at least 25 % of acquisition costs.
35	**10.2.1**	CHANGED CIRCUMSTANCE 9	As described above, assured funding for preserve management should be an integral component of every preserve acquisition. If preserve management funding becomes inadequate, then this should a serious breach of permit conditions. Outreach, education, and research programs should be emphasized as essential to the long-term success of the SEPCP, and not jettisoned due to an inadequate funding model.