



# City of Austin

P.O. Box 1088, Austin, TX 78767-1088

Public Comments Processing  
Attn: FWS-R2-ES-2019-0061  
U.S. Fish and Wildlife Service Headquarters  
MS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803

Re: City of Austin comments on the proposed listing of Central Texas mussels under the Endangered Species Act

The City of Austin (City) appreciates the opportunity to comment on the proposed listing of six Central Texas Unionid Mussels and associated designation of critical habitat under the Endangered Species Act. Four of the six species proposed for listing occur in the Colorado River Basin, the source of drinking water for over one million Austin residents. One species, the Texas fatmucket (*Lampsilis bracteata*) occurs within the City's full purpose jurisdiction in Onion Creek.

The City Watershed Protection Department (WPD) affirms the assertion that native Unionid mussels are among the most imperiled organisms in North America and recognizes the ecological benefits provided by mussels to improve water quality and biodiversity of our waterways.

The City WPD and other City departments have decades of experience and deep knowledge of Onion Creek and its riparian habitats and of the challenges they face. The City urges the Fish and Wildlife Service to draw on the City's expertise as you develop a species recovery plan for the Texas fatmucket in the portions of Lower Onion Creek and Upper Onion Creek identified as proposed critical habitat for the Texas fatmucket.

In 2018, WPD biologists encountered a live female Texas fatmucket in Lower Onion Creek during a special research study to document the presence and distribution of native mussels in watersheds with a hydrological connection to the Colorado River downstream of the Longhorn Dam. We agree with the Fish and Wildlife Service's (Service) suggested critical habitat for Texas fatmuckets that targets lower Onion Creek and welcome the opportunity to partner with the Service in the future to identify potential locations to study mussel survivability and potentially reintroduction of these imperiled mussels.

The City supports science-based conservation and related measures that protect rare species and their habitat. We partner with Travis County in the Balcones Canyonlands Conservation Plan, one of the first regional habitat conservation plans to conserve multiple endangered and rare species in the Central Texas region. We are supportive of regional efforts such as those envisioned by the River Authorities to conserve these candidate freshwater mussel species and critical habitat while balancing the needs of communities and industries. The existing efforts of the City to protect water quality and provide for flood resiliency contribute to enhancing habitat for freshwater mussels.

The City has adopted several important water quality regulations within the Land Development Code (LDC Chapter 25-8), which includes creek setbacks, erosion and sedimentation controls, floodplain modification regulations, and the need for structural water quality controls. We hope that these regulations, in addition to our ongoing resiliency efforts in the Onion Creek watershed to improve

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water quality, hydrology and flood hazards, will ensure that new development that drains to the future critical habitat of the Texas fatmucket will enhance its potential survivability into the future. With that said, we feel it is imperative that the City and Fish and Wildlife Service maintain a working relationship that encourages collaboration when development initiatives or permitting needs arise along the proposed critical habitat.

Austin Water must plan responsibly to provide sustainable, resilient, and equitable water supplies and wastewater services for our growing customer base. The proposed listing document describes special management practices that may be required in the critical habitat zones but there is still a high level of uncertainty as to what will be required. The City has a long history of effective land conservation and regulatory programs that protect the health of the rivers and streams in our jurisdiction and we look forward to working with the Service as those special management practices are developed.

In summary, the City of Austin supports the proposed endangered species listing of the five Central Texas mussels with critical habitat designation and the threatened status for one species. We offer our continued support to improve the ecological health of Onion Creek within our jurisdiction. We look forward to continuing to partner with the Fish and Wildlife Service and others in our region to balance environmental needs with reliable and affordable water and wastewater service for the citizens of Central Texas.