

[date]

Mr. Stan Bacon
[address]

Dear Mr. Bacon,

We have reviewed your proposal (Mount Bonnell View Restoration) submitted by The West Point Society of Central Texas. This proposal includes trimming vegetation and removing trees within approximately 800 square feet along the Mount Bonnell stairway to provide a view to the east from the pavilion. Previous tree trimming and removal was conducted in 2011 to provide public views of the Colorado River and City of Austin skyline.

As you may be aware, Mount Bonnell supports one of the largest remaining populations of the Bracted Twistflower (*Streptanthus bracteatus*), which is a candidate for federal listing as a threatened or endangered species. Bracted Twistflower is restricted to the eastern and southern edge of the Edwards Plateau and is currently found in only four counties. While Travis County is host to the largest concentration, only four of 11 populations occur on public land, including the Balcones Canyonlands Preserve. Mount Bonnell is part of the Balcones Canyonlands Preserve and is dual-managed by the Parks and Recreation Department (PARD) and Austin Water Utility (AWU). Bracted Twistflower grows in juniper-oak woodlands, and primary threats include suburban development, browsing by white-tailed deer, and human foot traffic. The City of Austin is a signatory to a multi-partner Memorandum of Agreement (MOA) to minimize these threats and protect the remaining Bracted Twistflower populations that occur on public lands.

As we have previously discussed, the Bracted Twistflower is an annual species. Each year, new plants grow from seed, bloom, produce seeds, and die. A seed may remain dormant in the soil for years, possibly even decades, until favorable habitat conditions at that very spot are appropriate for it to sprout. Because we cannot know where the plants will emerge, we must maintain suitable habitat conditions throughout the habitat areas where this plant has been found, which includes both sides of the Mount Bonnell stairway.

The Bracted Twistflower also occurs in areas that were previously treated to provide public views, which included trimming of lower limbs and removal of large Ashe juniper trees. As a result of this trimming and tree removal, these areas are now exposed to direct sunlight and support a thick growth of invasive plant species that inhibit the growth of Bracted Twistflowers. Tree trimming and removal increase light penetration on the forest floor, which alters the habitat conditions for the Bracted Twistflower. Increased sunlight increases the probability that competing plants will invade that area, effectively crowding out twistflowers. The tree trimming and removal has also encouraged the

creation of more social recreational trails, increasing the potential for soil erosion and trampling of Bracted Twistflowers.

As a cosigner of the MOA, the City of Austin (PARD and AWU) is bound by a legal agreement to protect the Bracted Twistflower. The proposed project poses significant threats to the plant's germination, reproduction, and habitat sustainability, and additional removal of trees and vegetation is not in the scope of the design of the park. Thus, we respectfully deny your request to conduct additional treatments along the Mount Bonnell stairway.

Sincerely,

William Conrad
Division Manager
Austin Water Utility, Wildland Conservation
BCCP Coordinating Committee Secretary

Troy Houtman
Division Manager
Parks and Recreation

CC: Sara Hensley, Director, Parks and Recreation
Greg Meszarus, Director, Austin Water Utility
David Juarez, Assistant Director, Parks and Recreation
Daryl Slusher, Assistant Director, Austin Waster Utility
BCCP Coordinating Committee
Sherri Kuhl, BCP Program Manager