United States Department of the Interior

FISH AND WILDLIFE SERVICE
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April 30, 2026

Eric Dephouse
U.S. Army Corps of Engineers
Fort Worth District CESWF-RDE
819 Taylor Street, Room 3A37
Fort Worth, Texas 76102-0300

Consultation No. 2026-0020455

Subject: Biological Opinion for the Brushy Creek Regional Trail Phase V Section 2 Project, Williamson County, Texas

Dear Eric Dephouse:

We received a request to initiate formal consultation pursuant to section 7(a)(2) of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.; Act), for the proposed construction of a pedestrian bridge to cross Brushy Creek in Round Rock, Williamson County, Texas (the proposed action). Williamson County (the Applicant) seeks approval from the United States Army Corps of Engineers (USACE), the lead federal action agency, for the proposed federal action necessitating the issuance of Nationwide Permit 14 for the linear transportation crossing that would transect Brushy Creek, a jurisdictional water of the U.S (SWF-2025-00300). Project specific activities involving the issuance of the USACE permit require interagency consultation between the U.S. Fish and Wildlife Service (Service) and the USACE regarding potential impacts to federally listed species within the project area. A determination of "may affect, likely to adversely affect," was made for the Jollyville Plateau salamander (*Eurycea tonkawae*; JPS), a species listed pursuant to the Act for direct or indirect impacts from proposed construction activities that are anticipated to impact the subsurface geology along the banks and within the streambed of Brushy Creek. While the Service designated critical habitat for JPS on approximately 4,331 acres in 32 units (78 FR 51328), there is no critical habitat within or near the proposed project; therefore, USACE did not make an effects determination on JPS critical habitat. The USACE requested formal consultation and submitted a Biological Assessment (Pape-Dawson 2026; BA) on February 18, 2026, detailing the project and its potential effects to listed species.

This Biological Opinion (BO) is based on information provided in the February 2026 BA, as well as telephone conversations, emails between the USACE, Pape-Dawson (the Applicant's consultant) project staff, the Applicant, peer-reviewed publications, species-specific Federal Register notices and supporting documents, and other sources of information. Literature cited in this BO is not a complete bibliography of all literature available on the species of concern,

construction activities and their effects, or other related subjects considered in this BO. A complete administrative record of this consultation is on file at the Service's Austin Ecological Services Field Office (ESFO).

In the BA the USACE made "no effect" determinations for Balcones spike (*Fusconaia iheringi*), tricolored bat (*Perimyotis subflavus*), monarch butterfly (*Danaus plexippus*), golden-cheeked warbler (*Setophaga chrysoparia*), and whooping crane (*Grus americana*). While these species are noted in our Information for Planning and Consultation database (IPaC, https://ipac.ecosphere.fws.gov/) as species that may be in the project area, the USACE does not expect them to be impacted by the project, and the Service takes no position on these calls; therefore, these species are not discussed further in this BO. Additionally, the USACE made "no effect" determinations for three terrestrial karst invertebrates (*Texella reyesi, Batrisodes texanus, Tayshaneta myopica)* for which the Service performed due diligence review due to the proximity of potential habitat to the project area.

The proposed pedestrian bridge spans the boundary between the McNeil-Round Rock and Georgetown Karst Fauna Regions (KFRs), geographic areas delineated based on discontinuity of karst habitat that may reduce or limit interaction between karst invertebrate populations. The project area also occurs within a narrow band of Karst Zone 4b (defined as areas, both cavernous and non-cavernous, that do not contain endangered karst invertebrate species). However, on either side of the proposed project the Williamson County's Brushy Creek Regional Trail is within Karst Zone 1, areas known to be occupied by endangered karst invertebrates. Those project areas have enrolled or are in the process of enrolling for participation in the Williamson County Regional Habitat Conservation Plan (RHCP) for incidental take coverage of karst invertebrates for those portions of the trail outside of the project area.

BIOLOGICAL OPINION

This transmits our BO for the proposed construction of a pedestrian bridge as part of the Brushy Creek Regional Trail in Round Rock, Williamson County, Texas. The proposed action is the issuance of a permit by USACE that would authorize the discharge of dredge and fill material within waters of the U.S. to construct a pedestrian bridge crossing that qualifies as a linear transportation project that meets the criteria for Nationwide Permit 14. Section 7 of the Act requires federal agencies to ensure that their discretionary actions are not likely to jeopardize the continued existence of species listed as federally threatened or endangered or destroy or adversely modify designated critical habitat of these species. The USACE is the lead federal action agency (action agency) pursuant to section 7 of the Act. The February 2026 BA describes how the Applicant will minimize, to the maximum extent practicable, adverse effects from activities potentially affecting the JPS, a species listed pursuant to the Act.

The Service concurs with the USACE's determination that the proposed action may affect, and is likely to adversely affect, the JPS. The project area is within the known endemic range of the species and within 400 feet of Saul Spring, a spring outlet where *Eurycea* salamanders were collected. We are still awaiting genetic confirmation that they are JPS; however, based on the distribution of *Eurycea* salamanders in Williamson County, it is appropriate to assume they are JPS (Figure 1). There are no known spring outlets within or immediately adjacent to the project area. However, the listed species may utilize subterranean karstic aquifer conduits within the

project area. Based on the proposed action's anticipated impacts to the environment and the project area's overlap with that species' habitat, range, and potential presence, the Applicant proposes to obtain incidental take coverage for the JPS in accordance with the Act. Because there is no JPS designated critical habitat around Saul Spring or within or adjacent to the project area, we will not be discussing JPS critical habitat within this BO.

Consultation History 2026-0020455

January 23, 2026	The Service received a request for initiation of formal consultation and a Draft BA from the USACE.
February 12, 2026	The Service completed its initial review and transmitted collated comments to the USACE and Applicant.
February 18, 2026	The USACE transmitted a revised BA that addressed the Service's comments.
February 24, 2026	The Service acknowledged a complete consultation package following a review of the final BAand initiation of consultation.
March 2, 2026	The Service requested additional information, specifically the total acreage of the action area and salamander survey report.
March 5-9, 2026	Pape-Dawson provided the requested information and project geospatial data for review.
March 9, 2026	The Service requested clarification on the date of salamander surveys performed and the nature of the genetic samples collected by Cambrian Environmental.
March 10, 2026	Cambrian Environmental submitted a revised report clarifying the survey dates and genetic sampling methodology for JPS at Saul Spring.
March 11, 2026	The Service requested and received additional details on the silt fencing to provide erosion control and water quality protection to Brushy Creek.
March 17, 2026	The Service requested additional information on construction methodology with regard to the project's potential impact to subsurface salamander habitat.
March 24-26, 2026	The Service received the requested additional information concerning materials and methods for temporary installation elements of the construction plan.
March 27, 2026	The Service shared a draft of the BO with USACE for review and comment.
March 31, 2026	The Service's Solicitors issued a nationwide pause to finalize BOs in response to court ruling, CBD et al. v. DOI, No. 24-4651 (N.D. Cal.).

April 6, 2026	The USACE commented that the BO should include the permittee with respect to compliance with the terms and conditions, and the Service revised the BO accordingly, consistent with other BOs issued in the recent past.
April 29, 2026	The Service's Solicitors issued guidance to implement updated verbiage to BOs in accordance with CBD et al. v. DOI, No. 24-4651 (N.D. Cal.), and the appropriate changes were made to the BO.
April 30, 2026	The Service shared the final draft BO to the Corps for review and comment following changes made to the BO in response to the court's ruling.
April 30, 2026	The Service finalized the BO and transmitted to the Corps, concluding section 7 consultation for the project.

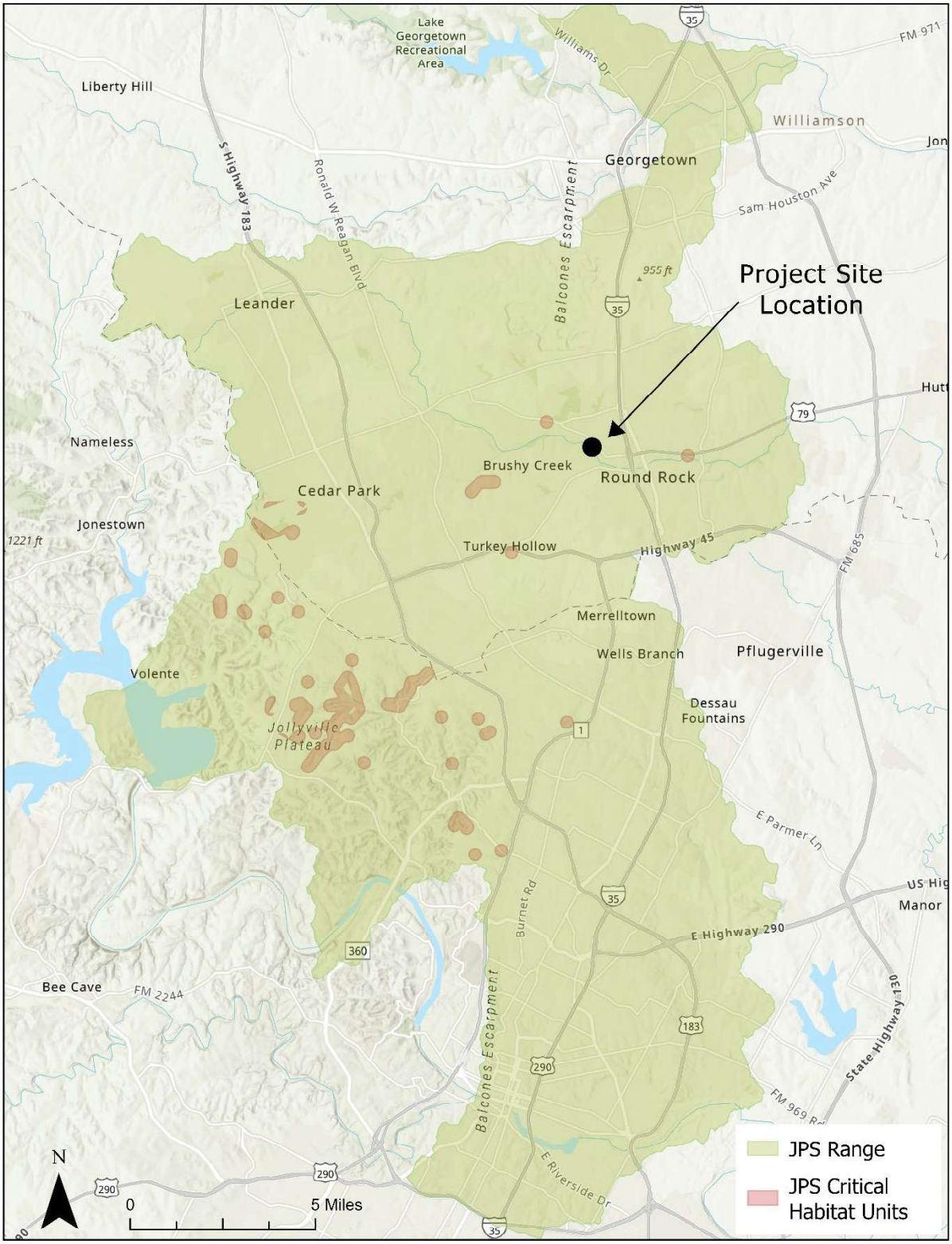

Figure 1: Project site location relative to JPS species range (shown in light green) and designated critical habitat units (shown as light red circles and polygons)

DESCRIPTION OF THE PROPOSED ACTION

Regulations implementing the Act (50 CFR 402.02) define "action" as "all activities or programs of any kind authorized, funded, or carried out, in whole or in part, by federal agencies of the United States or upon the high seas."

Action Area

The implementing regulations for section 7(a)(2) of the Act defines an action area to be "all areas affected directly or indirectly by the federal action and not merely the immediate area involved in the action" (50 CFR § 402.02).

The project is located in Round Rock, Williamson County, Texas, within a forested setting approximately 400 feet north of the Sonata Place cul-de-sac and 600 feet south of the Pearl Cove cul-de-sac, traversing Brushy Creek in the vicinity of existing and ongoing residential development (Figure 2). The action area is situated within the Texas Parks and Wildlife Department's (TPWD) designated Balcones Canyonlands Level IV Ecoregion of Texas, and further classified under the Edwards Plateau Level III Ecoregion, specifically within the categories of "Oak-Hardwood Motte and Woodland" and "Floodplain Hardwood Forest" (Elliott 2014, TPWD 2014). The action area is defined as the project's limits of construction and does not include an additional buffer beyond those limits because those portions of the project are receiving incidental take coverage through the Williamson County RHCP. The total action area acreage measures approximately 0.64 acre in size and includes the crossing structure, bridge abutments, drill shafts, and grading areas (Figure 3).

The action area does not include Saul Spring, located approximately 400 feet upstream. Due to the presence of predatory fish at the outlet that opens immediately into a ponded, lentic spring run (Cambrian Environmental 2025) before flowing into the deeper, lotic water of Brushy Creek also occupied by predatory fish (Bendik et al. 2016, Adcock et al. 2022 and 2025), surface habitat conditions downstream of Saul Spring outlet are unlikely to harbor salamanders. Additionally, previous surveys have not yielded salamander detections (Adcock et al. 2022). The action area is within the circular extent of the 984-foot horizontal radius centered around the Saul Spring outlet, which could be considered the presumed extent of subsurface JPS occupancy associated with the spring based on the methodology used to define the subsurface extent of JPS critical habitat units (Service 2013b). The 984-foot distance is based on the population extent of the Austin blind salamander, which the Service believes is the best representation of the subterranean habits of the JPS due to its genetic relatedness and geographic proximity (Service 2013b).

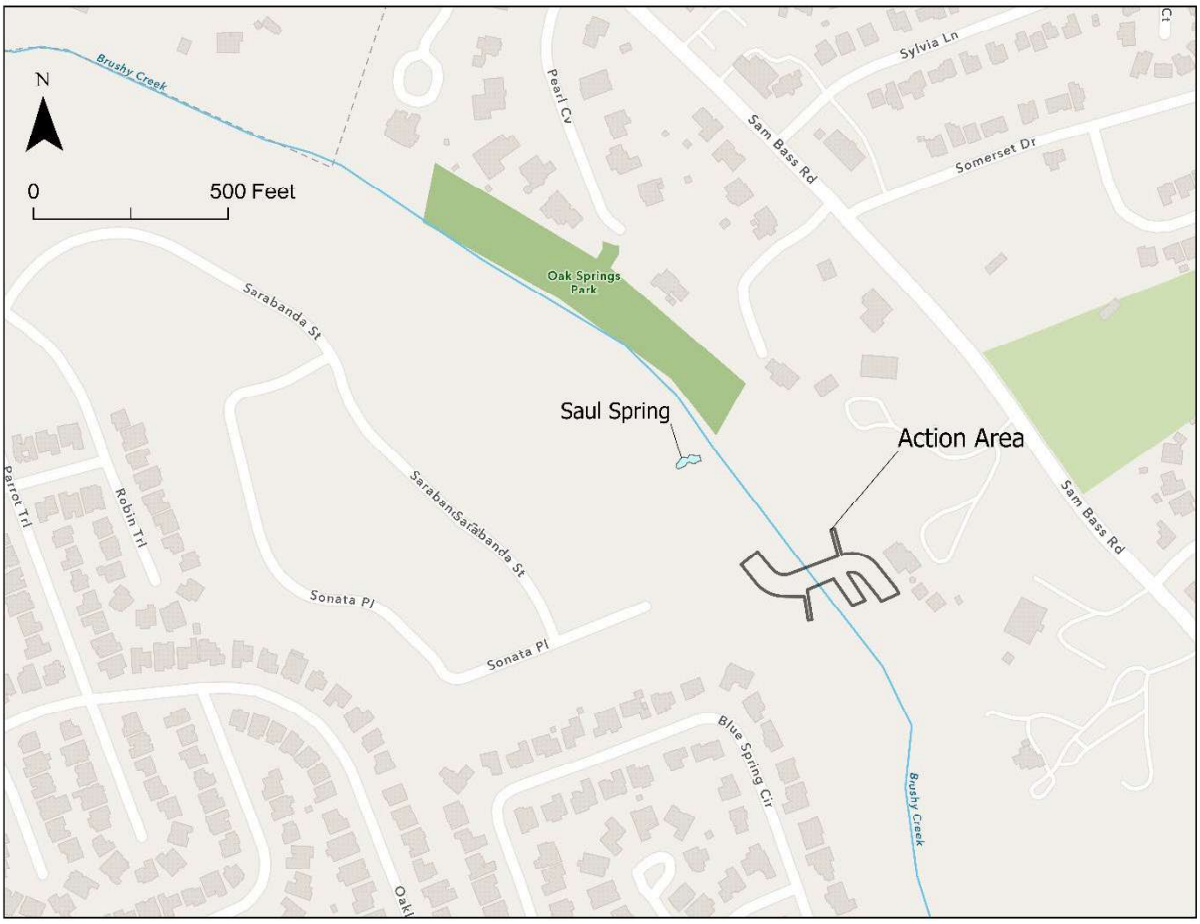

Figure 2: Brushy Creek pedestrian crossing bridge construction project's action area location and footprint relative to Saul Spring, an occupied spring for JPS (Cambrian Environmental 2025).

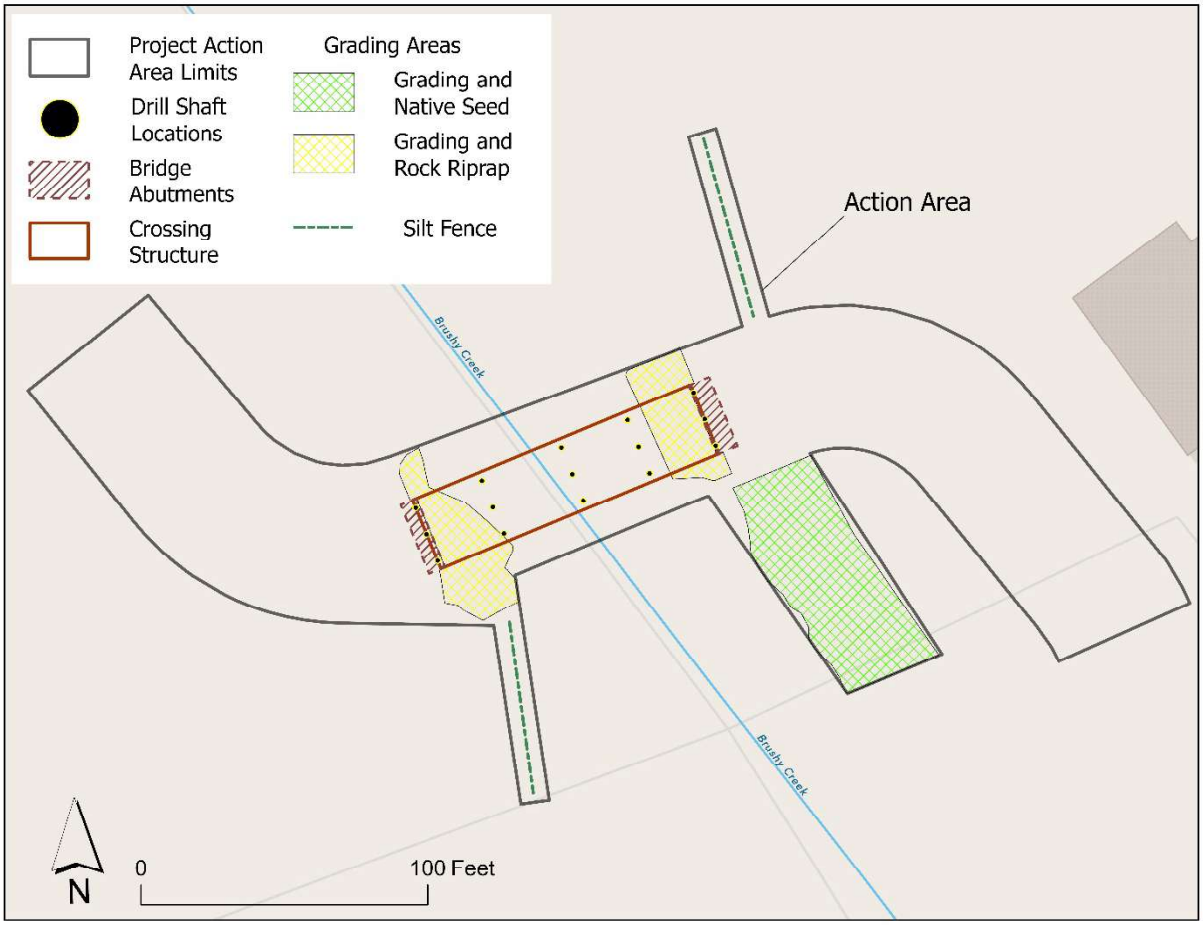

Figure 3: Pedestrian bridge crossing construction elements included within the action area

Proposed Action

The proposed project is the construction of a pedestrian bridge crossing associated with the Brushy Creek hike and bike trail extension. The project plan proposes to construct a segment of a concrete hike and bike trail approximately 10 feet in width that crosses over Brushy Creek. Construction plans describe a four-span, cast-in-place, continuous concrete slab pedestrian bridge measuring approximately 105 feet in total span length and 25 feet wide (the crossing structure comprised of a raised deck and abutments at each end). The bridge will be supported by 15 24-inch diameter drilled shafts (totaling approximately 180 linear feet). Associated structural components include reinforced concrete abutments, caps, and columns. A temporary access crossing is anticipated to be necessary to facilitate construction of the bridge. This crossing would include a pipe through its base allowing in-stream flow to continue, which would be removed upon completion of the pedestrian bridge crossing.

Machinery and equipment necessary to implement the proposed action would include a 50-ton crane, drill rig for shaft installation, concrete pump trucks, concrete delivery trucks, excavator, skid steer, and mini excavator. Drill shafts would be outfitted with a temporary watertight casing and a corrugated metal pipe liner within the casing that would be a permanent part of the foundation. The shafts would then be drilled at specified locations to a depth of 12 feet with

spoils removed in such a manner to minimize any entering Brushy Creek. Fluid concrete would be pumped into each shaft to a level sufficient to withstand ground and groundwater pressure and the temporary casing would be removed once borehole stability is reached (Pape-Dawson 2026). The pre-mixed concrete should preclude the scenario of loose fly ash blowing into the creek, and any overflow or seepage of concrete mix while the casing is being removed will be retrieved prior to re-introducing flowing water into the area immediately surrounding the drill shaft.

Because this project involves the construction of a new section of the Williamson County Regional Trail, there is currently no existing impervious cover in the vicinity of the Brushy Creek bridge crossing. New impervious cover proposed within the action area measures approximately 4,455 square feet (0.10 acre) of new at-grade asphalt trail plus 4,093 square feet (0.09 acre) of impervious area that will comprise the bridge crossing structure.

Conservation Measures

The Applicant will include a number of conservation measures as part of the proposed action. The following sections describe the relevant measures for the JPS in the action area.

To avoid or minimize direct effects to JPS, the design of the pedestrian bridge crossing includes appropriate stabilization and restoration measures. Because Saul Spring is likely occupied by JPS and subsurface habitat underlies the project, there is a potential for JPS to be present in the subsurface wetted karst habitat. As such, water quality BMPs will be properly implemented and maintained, such that the project is unlikely to cause direct impacts to groundwater flow regimes that may occur from surface and bedrock disturbances by project activities. Potential effects will be minimized through the implementation of the following BMPs:

1. Temporary and permanent BMPs that protect the Edwards Aquifer Recharge Zone, and sensitive karst features will be included in an approved Water Pollution Abatement Plan from the Texas Commission on Environmental Quality (TCEQ). These BMPs include the use of silt fencing, mulch socks, erosion control logs, rock filter dams, and/or soil retention blankets during construction. Erosion and sediment controls will be inspected during construction. Because TCEQ BMPs (30 TAC 213.3) were not intended or designed specifically to be protective of salamanders, additional BMPs described below will also support minimization of potential effects.

2. The original location of the pedestrian bridge was relocated further downstream (to approximately 400 feet distance) from the outlet of Saul Spring to avoid and minimize potential impacts to JPS that may be present in the spring run and/or subsurface habitat in the vicinity of the spring.

3. The bridge design consists of drilled pier foundations, as opposed to an open-bottom culvert structure with spread footing, which will minimize the temporary and permanent limits of disturbance to the underlying Edwards Limestone, thereby reducing the potential for encountering JPS individuals and their subterranean habitat.

4. Rock-riprap will be installed around the pedestrian bridge abutments to minimize the use of impervious cover and function as a bank stabilization and erosion control measure.

5. A turbidity curtain with a weighted bottom will be installed to protect downstream surface water quality from in-stream sediment transport. The curtain would remain in place in the upper water column to ensure that any sediment does not travel under the curtain and downstream from the project area. For any necessary dewatering activities, effluent will be treated using a BF400 bag filtration unit (or approved equal) that will provide a higher level of water quality protection for the aquifer and potential subsurface habitat.

6. Biologists familiar with JPS biology will train site workers in the environmental sensitivity of the site during a preconstruction meeting with employees and contractors involved with the proposed action to provide training, instructions regarding BMPs, and conservation measures. Project proponents should provide an information packet to workers/contractors that includes information on species of concern and their habitat with any details pertinent to the project area and conservation measures to avoid and minimize impacts.

7. Fuel storage and concrete washouts will not occur within 150 feet of wetted areas. Onsite workers and biological monitors should have access to emergency spill kits capable of handling small equipment spills. Construction vehicles and equipment should be inspected daily for signs of fuel or hydraulic leaks. Should a spill occur, the Service will be notified within 24 hours of the event.

8. Vegetation clearing will be minimized to the amount necessary and will avoid using herbicide or pesticide chemicals. Any topsoil removed during construction would be replaced in those areas of temporary disturbance and re-seeded with native species that will be protected with an erosional blanket along the bank of Brushy Creek to increase germination rates to promote soil stabilization. Onsite crews will avoid letting vegetative debris from clearing activities fall into wetted areas to avoid or minimize effects to JPS individuals and their subsurface habitat.

9. A section 10(a)(1)(A) *Eurycea*-permitted biologist will monitor onsite drilling and excavation activities for salamanders that may exit newly exposed surface expressions and will conduct presence/absence surveys at any onsite excavation location(s) that expose groundwater. In the event that the monitor observes JPS at the project site, construction activity in the immediate vicinity will cease and the JPS detection will be reported to the Service within 24 hours to discuss the optimal path forward.

10. During construction and until all ground-disturbing activities have ceased and the rights-of way have been receded, section 10(a)(1)(A) *Eurycea*-permitted biologist will conduct surveys approximately every two months at Saul Spring and following rain events of at least 0.5-inch within a 24-hour window, to occur between two to five days after the rainfall event. Additionally, the permitted biologist will conduct surveys in any excavation locations that expose groundwater.

11. Should a previously unidentified wetted subsurface void (e.g., aquifer conduit) be encountered during excavation, project activities in the immediate vicinity of the feature will cease and the immediate vicinity of the feature should be stabilized to prevent sedimentation, debris entry, or other adverse impacts to water quality. The appropriate agencies (e.g., TCEQ, USACE, and/or Service) will be notified. A biologist holding a valid section 10(a)(1)(A) recovery permit for salamanders will evaluate the feature for JPS presence/absence. Onsite workers, biological monitors, and pertinent regulatory authorities will coordinate to ensure compliance with applicable requirements of the Edwards Aquifer Protection Program (EAPP). Activities in the vicinity of the feature will not resume until TCEQ and the Service have reviewed and approved appropriate adaptive management protection measures to ensure the feature and underlying Edwards Aquifer are adequately protected.

    - If a subsurface void containing flowing or standing water is encountered during excavations outside of the wetted channel of Brushy Creek, the feature will be stabilized as necessary to prevent sedimentation, debris entry, or other adverse impacts to water quality. A biologist holding a valid section 10(a)(1)(A) recovery permit for *Eurycea* salamanders will evaluate the feature for presence of JPS. If salamanders are determined to be present, construction activities will cease, and the Service's Austin ESFO will be notified. Groundwater chemistry and habitat data will be assessed whenever possible by the permitted biologist.
    - If a subsurface void is encountered during excavation, in addition to the required TCEQ notification and EAPP compliance described above, a biologist holding a valid section 10(a)(1)(A) recovery permit for listed karst invertebrates will be notified to evaluate the feature for potential habitat suitability. If the feature is identified to contain potentially suitable habitat, the permitted biologist will implement survey and evaluation procedures consistent with current Service karst invertebrate survey guidance, including adherence to the "Special Instructions for Features Hit During Construction." Work will not resume in the area until the evaluation is complete and any required coordination with the Service has occurred in accordance with permit conditions and applicable guidance.

12. Onsite work crews will implement measures designed to prevent concrete from entering into flowing aquifer groundwater conduits or voids by using permanent casing to isolate (i.e., seal off) drill shaft excavations from the groundwater prior to pouring concrete. For all drill shaft/pier excavations that may encounter groundwater, provisions including temporary casing to reduce groundwater seepage would avoid or minimize water entering bridge pier excavations during construction.

13. If standing, seeping, or flowing water is encountered during excavation, the Groundwater Flow Mitigation and Protection Measures described below will be implemented.

Groundwater Flow Mitigation and Protection Measures

If standing, seeping, or flowing water is encountered at any excavation location outside of the wetted width of Brushy Creek, appropriate BMPs shall be immediately implemented to minimize surface runoff entering the excavation/feature and construction work within 50 feet shall cease

until a geoscientist evaluates the excavation to determine the source of the water and potential connectivity to the Edwards Aquifer. Should a feature contain water in connection with the Edwards Aquifer, a "Groundwater Mitigation and Solution Feature Closure Plan" shall include a design to permanently isolate (i.e., seal off) the excavation from the groundwater feature and describe measures to maintain hydrologic connectivity across, under, or around the excavation in accordance with TCEQ Edwards Aquifer Rules, as applicable.

The plan for excavations with flowing groundwater shall also include measures designed to permanently isolate and seal off the groundwater flow path from the rest of the excavation. For drilled shafts, the groundwater mitigation and solution feature closure plan shall typically use permanent casing to seal off the groundwater source and prevent contamination before pouring concrete. Casing is intended to prevent the migration of concrete into voids. If flowing water is encountered during the excavation of drilled shafts, the plan may include the permanent placement of casing in a manner that seals the drilled shaft off from the area of groundwater conductivity while allowing continuity of groundwater flow through the space surrounding the casing. If casing is not used, concrete migration into voids will be addressed on a case-by-case basis based on the nature of the void and the engineering needs of the project with an emphasis on groundwater protection. If accumulated groundwater must be pumped from an excavation, all pump intakes will be screened to exclude salamanders by placing cages with ≤ 1/16-inch spaced wire or finer mesh screen material over any intake to exclude salamanders. Water will be removed at a low velocity (less than one cubic foot per second), to prevent salamanders from becoming trapped on intake screens/cages, and a biologist holding a valid section 10(a)(1)(A) recovery permit for handling *Eurycea* salamanders will be present to capture and relocate any observed salamanders to a safe location (e.g., Saul Spring).

ANALYTICAL FRAMEWORK FOR JEOPARDY DETERMINATION AND DESTRUCTION OR ADVERSE MODIFICATION DETERMINATION

Section 7(a)(2) of the Act requires that federal agencies ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of listed species. "Jeopardize the continued existence of" means to engage in an action that reasonably would be expected, directly or indirectly, to reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of that species (50 CFR § 402.02).

The jeopardy analysis in this BO considers the effects of the action, and any cumulative effects, on the range-wide survival and recovery of the listed species. It relies on four components: (1) the Status of the Species, which describes the range-wide condition of the species, the factors responsible for that condition, and its survival and recovery needs; (2) the Environmental Baseline, which analyzes the condition of the listed species in the action area, without the consequences to the listed species caused by the proposed action; (3) the Effects of the Action, which includes all consequences to listed species that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action; and (4) the Cumulative Effects, which evaluates the effects of future, non-federal activities in the action area on the species.

For purposes of making the jeopardy determination, the Service: (1) reviews all the relevant information, (2) evaluates the current status of the species and environmental baseline, (3) evaluates the effects of the action and cumulative effects, (4) adds the effects of the action and cumulative effects to the environmental baseline, and, in light of the status of the species, determines if the proposed action is likely to jeopardize listed species.

STATUS OF THE SPECIES

JOLLYVILLE PLATEAU SALAMANDER

On August 20, 2013, the Service published a final rule to list the JPS as threatened (78 FR 51278) and designated critical habitat on approximately 4,331 acres in 32 units (78 FR 51328).

Species Description

The Jollyville Plateau salamander was described by Chippindale et al. (2000), based on morphology and genetic (mitochondrial DNA) tests. Adults are typically 1.5 to 2 inches long (COA 2001). Those salamanders occurring in spring habitat have large, well-developed eyes; wide, yellowish heads; blunt, rounded snouts; dark greenish-brown bodies; and bright yellowish-orange tails (Chippindale et al. 2000), as mentioned above briefly. Some cave forms of JPS exhibit cave-associated morphologies, such as eye reduction, flattening of the head, and dullness or loss of color (Chippindale et al. 2000).

Life History

The JPS is one of three salamander species that are endemic to the northern segment of the Edwards Aquifer, along with the Georgetown (*Eurycea naufragia*) and Salado (*Eurycea chisholmensis*) salamanders. These species are neotenic (i.e., do not transform into a terrestrial form) members of the family Plethodontidae. As neotenic salamanders, they retain juvenile characteristics (e.g., external gills) at maturity and inhabit aquatic habitats (e.g., springs, spring-runs, and wet caves) throughout their lives.

Distribution

The JPS occurs in the Jollyville Plateau and Brushy Creek areas of the Edwards Plateau. Its range is limited to northwest Travis County and southwest Williamson County, Texas, in an area characterized by recent trends of rapid population increase and infrastructure development. Jollyville Plateau salamanders are typically found near springs or seep outflows and are thought to require stable, cool temperatures and well oxygenated water supplied by the underlying Northern Segment of the Edwards Aquifer (COA 2001, Bowles et al. 2006, Cole 1995, Sweet 1982). *Eurycea* salamanders' habitat is typically supplied by surface water infiltrated through the soil or recharge features (e.g., caves, faults, fractures, sinkholes, or other open cavities) into the Edwards Aquifer, which discharges as groundwater from spring outlets (Devitt 2019). Surface-dwelling JPS also occur in subsurface habitat within the underground aquifer (COA 2001, Bowles et al. 2006). While no one has physically observed these salamanders in the aquifer, there are observations that support this behavior. For example, COA biologists have observed JPS at spring sites where the springs and associated spring runs had previously ceased flowing,

particularly during the 2006 drought, and the surrounding area dried (COA 2006). Additionally, COA biologists have noted low counts for small juveniles followed by high counts for large (presumably older) juveniles at several monitoring sites, indicating small juveniles spent time within the subsurface habitat (COA 2001).

The JPS occurs in approximately 130 springs and caves in Travis and Williamson counties (Service 2024). It depends on free-flowing adequate quantity and quality of groundwater from the aquifer for its primary supply of water for their aquatic habitats (Cole 1995). Access and proximity to the spring outlet (where water emerges from the ground) is important because of the appropriate stable water chemistry and temperature, substrate, and flow regime that occurs there (Service 2013b). The JPS retreat underground to wetted caves and aquifer habitat when surface habitats go dry and presumably also to some extent during normal flow conditions (Bendik 2011). Though little is known about the reproductive habits of these species in the wild, available data suggests that reproduction occurs year-round, with more reproduction occurring in winter and early spring compared to other seasons (Bowles et al. 2006, Bendik 2017). This salamander feeds on aquatic invertebrates that commonly occur in spring and other groundwater-dependent environments (City of Austin 2001, Diaz and Bronson-Warren 2018).

Threats and Recovery

The Service reviewed and analyzed threats to the species based on the *Recovery Outline for the Georgetown Salamander, Jollyville Plateau Salamander, and Salado Salamander* (Service 2024b) and the 2013 Final Rule listing the species (78 FR 51278). Degradation of habitat, in the form of reduced water quality and quantity and disturbance of spring sites, is the main threat to this species (Chippindale et al. 2000, Bowles et al. 2006, O'Donnell et al. 2006, Corn et al. 2003, COA 2001, Geismar 2005).

Another major threat to *Eurycea* salamanders is the increase of impervious land cover associated with anthropogenic developments in the proximity of groundwater surface expressions. While effects on a given site depend on local conditions, an observed trend is degradation of aquatic habitat quality correlating to greater levels of impervious cover within the watershed (Bowles et al. 2006, Miller et al. 2007). Threats from chemical and physical contaminants typically associated with urban runoff often originate from land applications of pesticides, fertilizers, inorganic litter/debris, and riparian and stream bank erosion leading to in-stream turbidity and sedimentation (Harfenist et al. 1989, Burton and Ingersoll 1994, Russell 2019). Additionally, Bendik et al. (2014) showed a negative effect of development on JPS densities from 17 sites over a 4-year period and that salamander counts declined over a 15-year period in areas that had the largest increases in residential development (a metric of urbanization). Other studies have shown that changes associated with urbanization often have negative effects on other salamander species' populations (Bank et al. 2006, Price et al. 2012)

Adequate spring flows and groundwater levels are essential to maintaining the known populations of salamanders since the reduction or cessation of spring flow supporting salamanders may result in extirpation of that population (Turner 2004, COA 2011). Boghici (2011) noted that the northern section of the Edwards Aquifer lacks a contributing zone, and recharge is mostly from diffuse infiltration of rainfall on the Edwards Limestone geologic outcrop. The Service has posited 984-foot buffers around springs for listed salamanders based on

scientific evidence suggesting that a population of these salamanders can extend at least 984 feet from a spring outlet via underground conduits or voids between rocks (Service 2013b). However, the hydrology of the Edwards Aquifer provides a complex system of groundwater transport conduits (e.g., karstic limestone) such that water quality at a given spring may be potentially influenced by anthropogenic activities further away (Hunt et al. 2005, TPWD 2012). Another recent study suggested that a catchment-wide, as opposed to the set buffer extent, approach to spring protection may afford more effective spring habitat protection on a landscape scale because of the unknown flow paths of a karst system (Diaz et al. 2020). We expect that recovery will require, at a minimum, a geographically distributed set of preserved springs with low impervious cover and sufficient buffers to protect against water quality degradation and to maintain water quantity.

We incorporate by reference the final listing rule and critical habitat designation (78 FR 51328). Additional information on this species' life history, range, habitat, threats, recovery needs, and status can be found at the Service's website (https://ecos.fws.gov/ecp/species/3116).

Previous Consultations

According to our consultation tracking database, there have been four formal section 7 consultations covering the JPS, three of which resulted in "take" and one of which determined "no effect" on the species. In 2021, Old Lampasas No. 3 Dam modernization project to correct the safety deficiencies and extend the detention capacity of the dam to improve water quality (Consultation # 2021-F-0508) resulted in 0.21 acre of surface habitat 7,486 cubic yards (CY) of subsurface habitat. In 2022, the "Dam 101" project to construct a new dam in the Upper Brushy Creek to temporarily impound storm water and prevent flooding (Consultation # 2022-0040601), which resulted in the estimated destruction of approximately 59,000 CY of subsurface JPS habitat from trenching, boring, and excavation activities. Also in 2022, the "State Loop 360 at Lakewood Drive/Spicewood Springs Road" project in which the Texas Department of Transportation (TxDOT) installed the addition of elevated roadways and improved interchanges through a 2.6-mile segment of that roadway (Consultation # 2022-0073720) resulted in an estimated extent of incidentally taking approximately six JPS individuals based on the number of JPS present during the 2019 surveys within project area. TxDOT incorporated avoidance and minimization measures into the project to minimize direct effects through ground disturbance, as well as additional conservation measures for the affected species.

There has been one section 10(a)(1)(B) Incidental Take Permit (ITP) and associated HCP that covers the JPS, the state-wide LCRA Transmission Services HCP. Effects from direct exposure due to implementation of the LCRA Transmission Services HCP could occur from subsurface disturbance within 984 ft of an occupied feature, which could result in the degradation of the spring site and reduce recharge to the feature. Effects to habitat could also occur due to surface disturbances within habitat that are limited to the addition of impervious cover where subsurface disturbance is not necessary. Activities authorized by the 30-year ITP were estimated to cause loss of up to three acres of JPS habitat range-wide, but other activities covered by the HCP included mitigation for these effects, which is expected to benefit this species.

ENVIRONMENTAL BASELINE

Regulations implementing the Act (50 CFR 402.02) define the environmental baseline as the condition of the listed species or its designated critical habitat in the action area, without the consequences to the listed species or designated critical habitat caused by the proposed action. The environmental baseline includes the past and present impacts of all federal, state, or private actions and other human activities in the action area, the anticipated impacts of all proposed federal projects in the action area that have already undergone formal or early section 7 consultation, and the impact of State or private actions which are contemporaneous with the consultation in process. To date, no covered projects have occurred, nor is the Service aware of any planned covered projects, within the action area of the Brushy Creek pedestrian bridge proposed project. The impacts to listed species or designated critical habitat from federal agency activities or existing federal agency facilities that are not within the agency's discretion to modify are part of the environmental baseline.

Williamson County Brushy Creek Regional Trail will extend the trail for recreational use across Brushy Creek by constructing a pedestrian bridge within the San Gabriel sub-basin (Eight Digit Hydrologic Unit Code 12070205) of the Brazos River Basin. The vicinity around the project is characterized by a mix of natural areas, including Brushy Creek and adjacent riparian and forested upland areas and existing and ongoing developments that include a residential subdivision currently under construction and a recently installed segment of sanitary sewer line that connects to the regional line just west of Saul Spring, which emerges at the base of a northeastern facing hillside and flows into the south bank of Brushy Creek approximately 65 feet from the spring outlet (Cambrian Environmental 2025).

Cambrian Environmental biologists first surveyed Saul Spring on April 30, 2024, and observed and captured four *Eurycea* salamanders during this initial survey (three of these were taken as whole specimen vouchers to be deposited at The University of Texas Biodiversity Collection, and the fourth was returned to the spring after a tail clip genetic voucher was retained). Two additional salamanders were later captured on June 17 and 19, 2024, and tail-clip genetic samples were taken from both of these before the salamanders were returned to the spring. No salamanders were observed during October 2024 surveys. Water temperature, pH, and specific conductivity measurements taken during the surveys confirmed that the occupied habitat fell within ranges typically occupied by *Eurycea* species (Davis et al. 2001, Adcock et al. 2016). Cambrian Environmental (2025) concluded that these salamanders were most likely JPS, though genetic confirmation is currently pending.

EFFECTS OF THE ACTION

In accordance with 50 CFR 402.02 (2018), effects of the action refers to the direct and indirect effects of an action on the species or critical habitat, together with the effects of other activities that are interrelated or interdependent with that action, that will be added to the environmental baseline. The environmental baseline includes the past and present impacts of all Federal, State, or private actions and other human activities in the action area, the anticipated impacts of all proposed Federal projects in the action area that have already undergone formal or early section 7 consultation, and the impact of State or private actions which are contemporaneous with the

consultation in process. Indirect effects are those that are caused by the proposed action and are later in time but still are reasonably certain to occur. Interrelated actions are those that are part of a larger action and depend on the larger action for their justification. Interdependent actions are those that have no independent utility apart from the action under consideration.

In this section, we consider effects to the species from the proposed action. We expect effects from the project to the species as a result of several different project stressors. We expect construction activities to result in disturbance of near-surface and subsurface habitats through trenching, boring, or excavation, particularly in the absence of effective conservation measures. Longer-term effects from the project include reduced connectivity of subsurface aquifer habitats, hydrology changes, and impacts to water and habitat quality affecting individuals of the species, their food base, and habitats on which they depend. We discuss these effects in the paragraphs below.

Ground Disturbance and Machinery

Because the surface and subsurface aquatic environments exist as a continuum, habitats are impacted by the same threats (Bendik 2012, COA, pers. comm. 2012). The construction of the pedestrian bridge is anticipated to cause temporary and permanent impacts to Brushy Creek, primarily due to 10 of the 15 drill shafts intended to support the pedestrian bridge that would be located within the streambed. We anticipate effects to JPS from the bridge improvement project could occur from subsurface disturbance that intersects with groundwater (e.g., drill shafts to install bridge support piers or columns). The pedestrian bridge crossing for the proposed recreational trail extension is expected to cause direct impacts to the streambed, the bedrock components of which are composed of Edwards Limestone. The proposed drill shafts would excavate karst limestone that likely transports Edwards Aquifer groundwater. The BA estimates that a total of 21 cubic yards of habitable karstic limestone would be excavated during construction of the bridge crossing.

To facilitate bridge construction, a temporary stream crossing constructed of bull rock will feature two approximately 40-foot-long, temporary (i.e., to be removed upon completion of the project's construction phase) drainpipes through its base to allow in-stream flow to bypass the construction area and avoid active dewatering operations. Stream flow will be directed into the drainpipes by an impermeable barrier made of stacked, concrete roadway barrier blocks (wrapped with poly geotextile fabric material for water resistance) that will be installed immediately upstream of the bridge within the USACE-permitted action area to allow a pad for machinery access that would be less invasive than introducing machinery into the stream channel. Upon completion of construction, an excavator operating from the bank or temporary access crossing will remove the bull rock. Finally, any remaining temporary fill (the underlying bull rock liner and access pad blocks) will be removed, and the streambed will be inspected, and lightly graded if needed, to ensure that the streambed matches pre-project contours. This temporary access crossing and riparian grading, and rock riprap deposits proposed along both banks adjacent to the crossing, will cause temporary impacts to the in-stream channel surface water flow which could potentially affect subterranean water flow temporarily.

As noted above, Cambrian Environmental (2025) conducted presence-absence surveys in 2024 that confirmed the presence of *Eurycea* salamanders at Saul Spring and concluded these were

most likely JPS, though genetic confirmation is currently pending. Consequently, it is reasonable to assume the species' occurrence in the interconnected subsurface geology extending past the action area, based on the application of a 984-foot horizontal radius extending from the Saul Spring outlet that delineates minimum expected subterranean habitat extent for Central Texas *Eurycea* species. As such, the construction of the pedestrian bridge is anticipated to cause temporary and permanent impacts to jurisdictional waters and underlying bedrock because the 15 proposed drill shafts will encounter areas that could harbor JPS individuals in subterranean habitat. The proposed action involves ground disturbance activities, such as grading, excavation, and drill shaft installation that may intersect subterranean JPS habitat (Service 2013b). As such, construction-related activities could accidentally encounter one or more aquifer conduit(s) potentially inhabited by JPS and injure JPS and/or impact subterranean habitat. Because the depth to groundwater conduits that feed spring discharge are unknown and expected to be variable, JPS individuals may be directly harmed or killed through contact with construction equipment, and/or salamander habitat may be permanently modified through disruption (e.g., drilling and shaft/pier installation) of previously undiscovered subsurface voids if subsurface groundwater conduits underly the project area.

Unavoidable impacts would be minimized by the adoption of the project's proposed suite of conservation measures that include placing the crossing further downstream of Saul Spring and its spring run, abiding by the Water Pollution Abatement Plan under the TCEQ Edwards Aquifer rules, and additional BMPs, as described in the "Conservation Measures" section. Measurable impacts to the Edwards Aquifer water quality are not expected due to relatively minor scale and scope of the overall project in conjunction with the conservation measures and BMPs that will be implemented. By implementing the proposed conservation measures, described in detail by the BMPs and Groundwater Flow Mitigation and Protection Measures, the proposed action will minimize impacts to groundwater flow patterns within the limits of construction.

Bridge foundation drill shafts and ground surface leveling and grading are project-related construction activities that require excavation. Approximately 21 cubic yards of bedrock may be impacted by construction activities for the proposed project. The action area is within the 984-foot radial extent from Saul Spring outlet indicating the likelihood of underground conduits or voids between rocks in the subterranean environment, as suggested by the best scientific evidence available at the time of the JPS final critical habitat rule (Service 2013b). We expect JPS would temporarily retreat into deeper subsurface habitat, if present at or around ground disturbance areas, to avoid direct contact with excavation, grading, and drilling activity. We recognize that very low numbers of JPS individuals may be temporarily affected by these disturbance effects; however, we do not anticipate that these activities and the associated response of exposed individuals would result in long-term effects to survival, growth, or reproduction of these individuals or result in species-level effects.

Construction Noise

Research has shown that aquatic vertebrates, including plethodontid salamanders, can detect and respond to sound and vibrations in water (Fay and Simmons 1999, Hilton 1952, Monath 1965). Salamanders occupying areas near above-ground construction as well as trenching and boring activities are expected to be exposed to noise and vibration from equipment operation. The resulting noise frequencies and pressure levels that might reach and potentially have negative effects on JPS are unknown. However, studies on the related Barton Springs salamander (*Eurycea sosorum*) did not detect a difference in abundance and density at Parthenia Springs during cleaning days at Barton Springs Pool where sound levels are comparable to those expected from the proposed construction activities (City of Austin 2013). Thus, we anticipate that possible short-term effects to JPS from noise and vibration would not be more than a short-term startle and/or avoidance response during the time construction is occurring near subsurface habitat. Thus, we expect that very low numbers of JPS individuals would be temporarily affected by noise effects, but we do not anticipate these activities, and the associated response of exposed individuals, will result in long-term effects to survival, growth, or reproduction of these individuals or result in species-level effects.

Post-Project Site Restoration & Salamander Surveys

All disturbed areas will be re-vegetated according to specifications and standards detailed in the February 2026 BA. Revegetation after construction is proposed to prevent erosion and reduce runoff into habitat, including vegetation maintenance to prevent vegetative debris from entering the water. As part of the proposed action, Williamson County has committed to "obtaining JPS data on population status, abundance, and dynamics through demographically closed survey events during and post construction activity" (Pape-Dawson 2026). Data collected from JPS survey results should be reported to the Service as described in the "Terms and Conditions" section of this BO. Information gathered from the surveys can be used to help improve the accuracy of JPS habitat delimitation for future decisions regarding the conservation of JPS in this area and throughout its range (Bendik et al. 2016).

Summary

Based on the inclusion of the conservation measures and species- and project-specific environmental considerations, while we do anticipate that there could be incidental take of JPS, we do not anticipate substantial sublethal or lethal impacts to individual JPS. Therefore, we expect that the proposed action, including the conservation measures described above, is not likely to appreciably reduce the likelihood of both the survival and recovery of the JPS in the wild. Based on the above, the Service concurs with USACE's determination that the proposed action may affect, and is likely to adversely affect, the JPS. Our conclusion is based upon a review of the information provided in the February 2026 BA in conjunction with the best available science regarding the species. The proposed action shall adhere to the USACE permitting guidelines and applicable regulations. USACE will ensure Williamson County's adherence to the terms and conditions of their permit.

CUMULATIVE EFFECTS

Cumulative effects are those effects of future state or private activities not involving federal activities that are reasonably certain to occur in the action area of the federal action subject to consultation (50 CFR 402.02). We considered cumulative effects in this BO, but do not consider future federal actions that are unrelated to the proposed action in this section because they require separate consultation pursuant to section 7 of the ESA.

While the project area and immediately-surrounding adjacent area is undeveloped, within the larger vicinity a residential subdivision to the west could result in cumulative effects to the JPS from additional impervious cover, removal of vegetation, increased pollution runoff, modification or destruction of unknown karst features or springs, and alterations to the surface and subsurface hydrological regimes as stormwater is directed to and through man-made structures such as stormwater and sanitary sewer lines.

CONCLUSION

After reviewing the current status of the JPS, the environmental baseline for the action area, the effects of the proposed action, and the cumulative effects, it is our biological opinion that the action, as proposed, is not likely to jeopardize the continued existence of the JPS.

We base this conclusion on the following:

1. The majority of the range of the JPS is not in the action area (see Figure 1) and will not be affected by the project.

2. The Applicant will minimize, to the maximum extent practicable, adverse effects from authorized activities through the implementation of BMPs and conservation measures during and post construction.

3. The approximately 0.64-acre action area is within the presumed extent of subsurface JPS habitat from Saul Spring. The action area portion of the overall 984-foot radius subsurface habitat area (equivalent to approximately 70 acres) that would be directly affected by construction is less than 1% of the total subsurface approximated extent area.

4. The overall impact of the proposed project may impact small numbers of JPS individuals but is not expected to negatively affect the overall survival and recovery of the listed species or result in any removal or degradation of critical habitat since the action area does not overlap with JPS designated critical habitat.

The conclusions of this BO are based on full implementation of the project as described in the "Description of the Proposed Action" section of this document, including any conservation measures that were incorporated into the project design, as described previously.

INCIDENTAL TAKE STATEMENT

Section 9 of the Act and federal regulations pursuant to section 4(d) of the Act prohibit the take of endangered and threatened species, respectively, without special exemption. “Take” is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct. “Harm” is further defined (50 CFR § 17.3) to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. “Harass” is defined (50 CFR § 17.3) as intentional or negligent actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns which include, but are not limited to, breeding, feeding or sheltering. “Incidental take” is defined as take that is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity. Under the terms of section 7(b)(4) and section 7(o)(2), taking that is incidental to and not intended as part of the agency action is not considered to be prohibited taking under the Act provided that such taking is in compliance with the terms and conditions of this Incidental Take Statement.

The measures described below are non-discretionary and must be undertaken by the USACE for the exemption in section 7(o)(2) to apply. The USACE has a continuing duty to regulate the activity under their jurisdiction covered by this incidental take statement. If the USACE (1) fails to assume and implement the terms and conditions or (2) fails to require the Applicant to adhere to the terms and conditions of the incidental take statement through enforceable terms that are added to the permit or grant document, the protective coverage of section 7(o)(2) may lapse. To monitor the impact of incidental take, the USACE and/or the Applicant must report, as specified below, the progress of the action and its impact on the species as specified in the incidental take statement [50 CFR §402.14(i)(3)].

AMOUNT OR EXTENT OF TAKE

The Service anticipates incidental take of JPS will be difficult to quantify for the following reasons: individuals of these species are small, are difficult to detect unless observed undisturbed in their environment, and occupied karst features and groundwater conduits in this area are often undetectable until they are exposed by surface or bedrock disturbing activities. Therefore, this BO does not propose a precise mechanism for predicting the number of JPS individuals that may actually be harmed by the proposed project. Because quantifying take of individuals of these species is difficult, this BO instead evaluates cubic yards of habitat affected as a surrogate (50 CFR 402.14(i)(1)(i)) for the amount or extent of incidental take. The amounts of incidental take in the form of harm (lethal and sublethal effects) reasonably certain to occur can be estimated using the amount of subsurface habitat impacts, as described in the “Effects of the Action” section. The Service anticipates the total quantity of JPS subsurface habitat destroyed from drilling, excavation, and grading activities in shallow groundwater areas will total approximately 21 cubic yards within the action area, based on the information provided by the BA (Pape-Dawson 2026). Compared to previously evaluated projects that received section 7 incidental take permits, this project predicts a significantly lesser extent of take of JPS individuals due to the relatively small volume of subsurface disturbance proposed for this pedestrian bridge.

EFFECT OF THE TAKE

In the accompanying BO, we have determined that the level of anticipated take is not likely to jeopardize the continued existence of JPS by the anticipated effects of the proposed action discussed in the Effects of the Action section. Although we anticipate some incidental take will occur, the implementation of the conservation measures proposed should ultimately result in avoidance and minimization of most of the adverse effects and offsetting the project's potential biological impacts to the extent practicable.

REASONABLE AND PRUDENT MEASURES

"Reasonable and prudent measures" (RPMs) are those actions the Service considers necessary or appropriate to minimize the impacts of the incidental take on the species (50 CFR 402.02).

The Service believes the following reasonable and prudent measures will minimize the impact of incidental take of listed species from the proposed action.

1. For all project-related activities and impacts, both within and outside of the USACE jurisdiction: The USACE/Williamson County shall use its authorities to minimize impacts of incidental take to the listed species addressed in this Incidental Take Statement.

TERMS AND CONDITIONS

To be exempt from the prohibitions of section 9 and section 4(d) of the Act, the USACE/Williamson County must comply with their respective following terms and conditions, which implement the RPM described above.

As part of the RPM and Terms and Conditions described below, we anticipate monitoring and reporting will be needed to confirm our assumptions in our BO, as well as the assumptions outlined in the BA. To implement the RPM specified above, the USACE/Williamson County shall ensure the following Terms and Conditions are implemented related to monitoring and reporting.

Terms and Conditions Applicable to RPM #1

The USACE/Williamson County must ensure compliance with the following terms and conditions, including monitoring and reporting of the impacts of incidental take that apply to activities outside of the USACE jurisdiction by implementing the following:

1. The USACE/Williamson County shall provide annual reports to the Service for all project related activities on the anniversary of the USACE-issued permit and continuing until the calendar year after all construction and restoration has been completed. Geospatial information may be submitted as GIS shapefiles or exported map formats. The reports must include the following information:

a. Dates the construction and restoration activities occurred;
b. Total amounts of excavated materials compared to proposed;
c. Descriptions of any void mitigation protocols implemented, including how the situation was resolved;
d. Descriptions of the conservation measures implemented, including salamander survey results during and post construction activity;
e. Any deviations from the proposed project or conservation measures; and
f. Other pertinent information.

2. In the event one or more suspected or confirmed JPS individuals are encountered during the proposed construction activities or concurrent salamander surveys, the surveyors will also reach out via email to the USACE and Austin ESFO contact below within 10 business days to:

    a. notify the office of their findings or preliminary findings, and
    b. discuss any relevant adjustments to the proposed action, as needed.

CONSERVATION RECOMMENDATIONS

Section 7(a)(1) of the Act directs federal agencies to utilize their authorities to further the purposes of the Act by carrying out conservation programs for the benefit of endangered and threatened species. Conservation recommendations are discretionary agency activities to minimize or avoid adverse effects of a proposed action on listed species or critical habitat, to help implement recovery plans, or to develop information.

1. Assist with implementing recovery tasks for those species with recovery plans.

2. Obtain data on JPS population status, abundance, and dynamics through demographically closed survey events during and post construction activity.

For the Service to be kept informed of actions minimizing or avoiding adverse effects or benefitting listed species or their habitats, the Service requests notification of the implementation of any conservation recommendations.

REINITIATION NOTICE

This concludes formal consultation on the Brushy Creek Phase V Section 2 pedestrian bridge project. As provided in 50 CFR §402.16, reinitiation of consultation is required and shall be requested by the Federal agency or by the Service, where discretionary federal agency involvement or control over the action has been retained (or is authorized by law) and if: (1) the amount or extent of incidental take is exceeded; (2) new information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered in this opinion; (3) the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in this biological opinion or written concurrence; or (4) a new species is listed or critical habitat designated that may be affected by the action. In instances where the amount or extent of incidental take is exceeded, any operations causing such take must cease pending reinitiation.

We request that details of the project completion and post-construction restoration efforts be reported directly to the Service upon completion. Please include the consultation number 2026-0020455 in correspondence concerning this project. Should you require further assistance or if you have any questions, please contact Aaron Conti at aaron_conti@fws.gov or the Austin ESFO Consultations Division at FW2_AUES_Consult@fws.gov.

Sincerely,

CHRISTINA WILLIAMS

Digitally signed by CHRISTINA WILLIAMS
Date: 2026.04.30 13:39:19 -05'00'

Christina Williams
Acting Project Leader

cc: TW Dieckmann, Senior Director of Parks and Recreation, Williamson County, Texas

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