

**APPENDIX IIE2-3**  
**TPWD RESPONSE TO RECOMMENDATIONS**



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November 10, 2017

Frank Zeng  
Texas Commission on Environmental Quality  
Municipal Solid Waste Permits Section  
P.O. Box 13087  
Austin, TX 78711-3087

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RE: Edinburg Regional Disposal Facility Permit Amendment, TCEQ Permit  
Application No. 956C, Hidalgo County, Texas  
Tracking N0. 21832886; N600647978/RN102217734

Dear Mr. Zeng:

This letter is in response to your request for Texas Parks and Wildlife Department (TPWD) staff to review the proposed permit amendment referenced above. On behalf of the City of Edinburg, Golder Associates, Inc. prepared a Permit Amendment Application for the Texas Commission on Environmental Quality (TCEQ) Solid Waste Permits Division.

Please be aware that a written response to a TPWD recommendation or informational comment received by a state governmental agency may be required by state law. For further guidance, please see the Texas Parks and Wildlife Code, §12.0011, which can be found online at <http://www.statutes.legis.state.tx.us/Docs/PW/htm/PW.12.htm#12.0011>. For tracking purposes, please refer to TPWD **Project #38695** in any return correspondence regarding this project.

**Previous Coordination**

TPWD provided comments and recommendations to Golder Associates regarding potential impacts to state fish, wildlife, and habitat resources on September 14, 2015. In a response to TPWD's recommendations, Golder Associates described an agreement reached between the City of Edinburg and the U.S. Fish and Wildlife Service (USFWS) to preserve a 200-foot wide corridor of dense native woodland within the landfill expansion area and to establish a 200-foot wide corridor planted with native vegetation connecting the landfill property to city owned property.

A map of the proposed wildlife corridor was provided on page 118 of Appendix II-E of the permit application.

Additionally, the applicant would take other actions and implement best management practices (BMPs) aimed at avoiding and/or minimizing potential negative impacts to listed species.



The TCEQ has requested the applicant include detailed measures in the application to implement the agreement with the USFWS and TPWD.

**Comment:** In an email dated October 25, 2017, TPWD agreed with the responses to its recommendations provided to Golder Associates in 2015. It is TPWD's understanding that a 200-foot wide corridor of existing native woodlands will be preserved within the eastern portion of the landfill expansion area and that a separate 200-foot wide corridor will be established connecting the landfill boundary to other city owned property, as depicted in the figure on page 118 of Appendix II-E of the permit application.

**Recommendation:** In satisfying TCEQ's request to include detailed measures in the application regarding the implementation of the agreement between the City and the USFWS and TPWD, TPWD recommends developing a list of native vegetation that will be planted in the 200-foot wide corridor that will be established. The list should consist of regional native species and include shrubs, trees, and herbaceous species, particularly species important to pollinators (see below). Also, a maintenance plan that ensures an 85% survival rate of the planted vegetation after two growing seasons should be developed and included in the application.

#### *Landscaping for Monarch Butterflies*

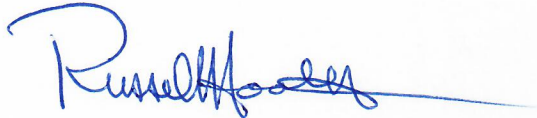
Significant declines in the population of migrating monarch butterflies (*Danaus plexippus*) have led to widespread concern about this species and the long-term persistence of the North American monarch migration. As part of an international conservation effort, TPWD has developed a Texas Monarch and Native Pollinator Conservation Plan. One of the broad categories of action in the plan is to augment larval feeding and adult nectaring opportunities. The plan can be found online at [http://tpwd.texas.gov/publications/pwdpubs/media/pwd\\_rp\\_w7000\\_2070.pdf](http://tpwd.texas.gov/publications/pwdpubs/media/pwd_rp_w7000_2070.pdf).

**Recommendation:** For disturbed sites or sites undergoing revegetation within the monarch migration corridor, TPWD recommends revegetation efforts include planting or seeding native milkweed (*Asclepias* spp.) and nectar plants as funding and seed availability allow. Where appropriate and sustainable, TPWD recommends landscaping plans incorporate monarch-friendly plants. Information about monarch biology, migration, and butterfly gardening can be found online at <http://www.monarchwach.org>.

Mr. Frank Zeng  
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TPWD appreciates the opportunity to review the proposed project. Please contact me at (361) 825-3240 or **[russell.hooten@tpwd.texas.gov](mailto:russell.hooten@tpwd.texas.gov)** if you have any questions regarding our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Russell Hooten", with a long horizontal flourish extending to the right.

Russell Hooten  
Wildlife Habitat Assessment Program  
Wildlife Division

/rh 38695