

Mr. Brian Almon, P.E.
Public Utility Commission
P.O. Box 13326
Austin, Tx 78711-3326

RE: : Public Utility Commission (PUC) Docket No. 39479 – Application of LCRA
Transmission Services Corporation (LCRA TSC) to Amend Its Certificate of
Convenience and Necessity (CCN) for the Proposed Cushman to Highway 123 138-
kiloVolt (kV) Transmission Line in Guadalupe County

Dear Mr. Almon,

The Geronimo and Alligator Creeks Watershed Partnership (Partnership) reviewed the LCRA TSC Application to amend its CCN for the proposed Cushman to Highway 123 Transmission Line Project. The Partnership would like to offer the following information, comments and recommendation.

Geronimo Creek is listed on the Federal Clean Water Act § 303(d) List of Impaired Waters for elevated levels of *E. coli* bacteria and has identified concerns for elevated levels of nitrate-nitrogen. The Partnership is a group of stakeholders that was formed to protect and improve water quality in Geronimo and Alligator Creeks. As a means to achieve this goal, stakeholders developed the draft Geronimo and Alligator Creeks Watershed Protection Plan (WPP). The draft WPP has identified potential sources of bacteria and nutrients in the watershed, and contains management measures to address each potential source. More information on the WPP may be found at www.geronimocreek.org/.

Maintaining the natural vegetation of the riparian corridor is essential to protecting the quality of water in these creeks. A healthy riparian corridor serves numerous useful functions such as shade, streambank stability and erosion control, floodplain functions, wildlife habitat, aquatic life habitat, benthic macroinvertebrate habitat, and many others. Geronimo Creek is a valued local resource, but also has been identified as an Ecologically Significant Stream Segment (ESSS) for the State of Texas due to its high aesthetic value, water quality, and exceptional aquatic life.

It is the recommendation of the Partnership's Steering Committee that damage to Geronimo Creek be avoided to the greatest extent possible during construction of the transmission line. For this reason, the Partnership supports the recommendation submitted by the Texas Parks & Wildlife Department in their August 22, 2011 letter which identifies routes 1, 2, and 16 (routes that follow the western alignment, as opposed to those that follow the eastern alignment) as those least likely to impact this highly valued resource of Texas. The Partnership appreciates the opportunity to review and comment on the Environmental Assessment and CCN application. Please let us know if you have any questions.

Sincerely,

Ward Ling,

On behalf of The Geronimo and Alligator Creek Partnership Steering Committee