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## Proposed Modification to Georgia Land Trust In-Lieu Fee Program Instrument, SAS-2011-00779 (UNCLASSIFIED)

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Mon, Jan 26, 2015 at 9:04 AM

To: Bill Rutlin <William.M.Rutlin@usace.army.mil>

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Hi Bill,

Page 31 of the Georgia Land Trust's (GLT) Final In-Lieu Fee Mitigation Banking Instrument (MBI), dated November 2013, states "*Once GLT has sold all of its advance credits, no more advance credits may be sold until an equivalent number of credits have been released in accordance with the approved credit release schedule outlined in a project-specific site mitigation plan or by purchasing credits from a mitigation bank as approved by the DE. Once an advance credit is fulfilled, an equivalent number of advance credits may be made available for sale, at the discretion of the district engineer and IRT.*" Has GLT sold the available credits on the books yet or would the credits in the watersheds requested be in addition to the credits presented in Table 1? Does the GLT have projects/plans for fulfilling these credits? Would there be a time limit on how long GLT has to construct a project which would meet these advance credits?

GLT is requesting to sell advance credits in four watersheds to meet needs of the Georgia Department of Transportation; the Satilla River watershed extends into the coastal zone. Page 12 of the Final Mitigation Banking Instrument, dated November 2013, states "*The GLT-ILF as currently proposed does not include credits for tidally influenced or salt marsh mitigation.*" NMFS recommends this provision be applied to any advance credit sales; that is, these credits are not used to offset impacts occurring in tidally influenced habitats (i.e., essential fish habitat). This language should be clear in any approval letter or revision to the MBI.

Cheers,  
Jaclyn

On Thu, Jan 22, 2015 at 9:23 AM, Moore, Kelie <Kelie.Moore@dnr.state.ga.us> wrote:

[Quoted text hidden]

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