JOINT PUBLIC NOTICE

July 22, 2019

United States Army
Corps of Engineers
New Orleans District
Regulatory Branch
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New Orleans, La. 70160-0267
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David.M.Soileau@usace.army.mil
Project Manager
David Soileau
Permit Application Number
MVN-2016-01056-MD

State of Louisiana
Department of Environmental Quality
Post Office Box 4313
Baton Rouge, La. 70821-4313
Attn: Water Quality Certifications
(225) 219-3225 FAX (225) 325-8250
Elizabeth.Hill@la.gov
Project Manager
Elizabeth Hill
WQC Application Number
WQC # 190722-01

Interested parties are hereby notified that a permit application has been received by the New Orleans District of the U.S. Army Corps of Engineers pursuant to: [ ] Section 10 of the Rivers and Harbors Act of March 3, 1899 (30 Stat. 1151; 33 USC 403); and/or [X] Section 404 of the Clean Water Act (86 Stat. 816; 33 USC 1344).

Application has also been made to the Louisiana Department of Environmental Quality, for a Water Quality Certification (WQC) in accordance with statutory authority contained in Louisiana Revised Statutes of 1950, Title 30, Chapter 11, Part IV, Section 2074 A(3) and provisions of Section 401 of the Clean Water Act (P.L.95-17).

ST. GABRIEL MITIGATION BANK IN ALLEN PARISH

NAME OF APPLICANT: St. Gabriel Resources, LLC; Care of: Southland Environmental, LLC; Attention: Cleveland Hoffpauir; 510 Clarence Street; Lake Charles, Louisiana 70601.

LOCATION OF WORK: The 165.13-acre site is located approximately 8 miles west of Kinder, Louisiana, in Allen Parish as shown on attached drawings (Latitude: 30.509563° N, Longitude:–92.985540° W). The Project is located within the Upper Calcasieu Watershed, Hydrologic Unit 08080203.

CHARACTER OF WORK: Existing elevated road beds and associated drainage located on the western boundary and north central area of the tract will be mechanically leveled to natural grade in an effort to restore hydrologic sheet flow. The existing loblolly pine plantation will be commercially harvested, and any remaining elevated earthen beds associated with the pine plantation (that were not eliminated by the mechanical harvest equipment) will be removed utilizing a mechanical drum chopping technique to restore natural contours. Additionally, a 16-inch diameter culvert will be installed in an existing access road that is necessary for pipeline right-of-way maintenance and well pad access. The culvert will be installed within a flatwoods pond area to provide hydrologic connectivity. Approximately 139.95 acres of the site will be planted with longleaf pine seedlings, and 19.08 acres of existing bottomland hardwood forest will be preserved under the subject conservation servitude. All work is being done for the purpose of constructing a wetland mitigation bank.

The comment period for the Department of the Army Permit and the Louisiana Department of Environmental Quality WQC will close **30 days** from the date of this joint public notice. Written comments, including suggestions for modifications or objections to the proposed work, stating

reasons thereof, are being solicited from anyone having interest in this permit and/or this WQC request and must be mailed so as to be received before or by the last day of the comment period. Letters concerning the Corps of Engineers permit application must reference the applicant's name and the Permit Application Number, and be mailed to the Corps of Engineers at the address above, ATTENTION: REGULATORY BRANCH. Similar letters concerning the Water Quality Certification must reference the applicant's name and the WQC Application Number and be mailed to the Louisiana Department of Environmental Quality at the address above.

The application for this proposed project is on file with the Louisiana Department of Environmental Quality and may be examined during weekdays between 8:00 a.m. and 4:30 p.m. Copies may be obtained upon payment of costs of reproduction.

Corps of Engineers Permit Criteria

The decision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit which reasonably may be expected to accrue from the proposal must be balanced against its reasonably foreseeable detriments. All factors which may be relevant to the proposal will be considered including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership and, in general, the needs and welfare of the people.

The U.S. Army Corps of Engineers is soliciting comments from the public, federal, state, and local agencies and officials, Indian Tribes, and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the U.S. Army Corps of Engineers to determine whether to make, modify, condition, or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and other public interest factors listed above. Comments are used in the preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

The New Orleans District is unaware of properties listed on the National Register of Historic Places near the proposed work. The possibility exists that the proposed work may damage or destroy presently unknown archeological, scientific, prehistorical, historical sites, or data. Issuance of this public notice solicits input from the State Archeologist and State Historic Preservation Officer regarding potential impacts to cultural resources. After receipt of comments from this public notice the Corps will evaluate potential impacts and consult with the State Historic Preservation Officer and Native American Tribes in accordance with Section 106 of the national Historic Preservation Act, as appropriate.

Our initial finding is that the proposed work would neither affect any species listed as endangered, nor affect any habitat designated as critical to the survival and recovery of any endangered species listed by the U.S. Department of Commerce.

Utilizing Standard Local Operating Procedures for Endangered Species in Louisiana (SLOPES), dated October 22, 2014, between the U.S. Army Corps of Engineers, New Orleans and U.S. Fish and Wildlife Service, Ecological Services Office, the Corps has determined that the proposed activity would have no effect on any species listed as threatened or endangered by the U.S. Department of the Interior.

This notice initiates the Essential Fish Habitat (EFH) consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act. The applicant's proposal would result in the destruction or alteration of N/A acre(s) of EFH utilized by various life stages of red drum and penaeid shrimp. Our initial determination is that the proposed action would not have a substantial adverse impact on EFH or federally managed fisheries in the Gulf of Mexico. Our final determination relative to project impacts and the need for mitigation measures is subject to review by and coordination with the National Marine Fisheries Service.

If the proposed work involves deposits of dredged or fill material into navigable waters, the evaluation of the probable impacts will include the application of guidelines established by the Administrator of the Environmental Protection Agency. Also, a certification that the proposed activity will not violate applicable water quality standards will be required from the Department of Environmental Quality, before a permit is issued.

Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application. Requests for public hearings shall state, with particularity, the reasons for holding a public hearing.

You are requested to communicate the information contained in this notice to any other parties whom you deem likely to have interest in the matter.

for

Martin S. Mayer
Chief, Regulatory Branch

Enclosure

SOUTHLAND ENVIRONMENTAL

April 25, 2019

David M. Soileau, Jr.
U.S. Army Corps of Engineers
646 Cajundome Blvd. Suite 301
Lafayette, LA 70506

RE: Proposed St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Dear Mr. Soileau:

Southland Environmental, LLC has been contracted to provide consulting services related to approval, implementation, and management of the proposed St. Gabriel Mitigation Bank located on the south side of U.S. Highway 190, approximately eight miles west of Kinder in Allen Parish. The Prospectus for the project is attached.

The proposed mitigation bank will contain approximately 165 acres and will be used to provide compensatory mitigation for unavoidable, permitted impacts to jurisdictional wetlands.

If you have any questions, or need additional information, please contact us.

Sincerely,

Cleveland Hoffpauir
Environmental Scientist

cc: David Daigle

Prospectus for the Proposed St. Gabriel Mitigation Bank

Allen Parish, Louisiana

Sponsor:

St. Gabriel Resources, LLC
P.O. Box 57
Ragley, Louisiana 70657

ST. GABRIEL
RESOURCES, LLC

April 2019

Agent:

Southland Environmental, LLC
c/o Cleveland R. Hoffpauir
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Lake Charles, Louisiana 70601
cleve@southlandenv.com

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1.0 INTRODUCTION

Southland Environmental, LLC, (Southland Environmental) respectfully submits this prospectus to the U.S. Army Corps of Engineers (USACE) and the Interagency Review Team (IRT) on behalf of St. Gabriel Resources, LLC (Sponsor) to initiate evaluation of the Saint Gabriel Mitigation Bank (SGMB). The Sponsor proposes to rehabilitate and re-establish longleaf pine, longleaf pine savannah and flatwoods pond habitats (collectively pine flatwoods/savannah) (PF/S) and to preserve bottomland hardwood habitats on approximately 165.13 acres in Allen Parish, Louisiana (Figure 1, Site Location Map). The proposed use of the Bank will be to provide compensatory wetland mitigation credits for projects that impact wetlands. The proposed mitigation bank site is currently managed as a loblolly pine tree farm plantation functioning in an impaired state.

1.1 SITE LOCATION

The proposed SGMB site is located on the south side of U.S. Highway 190, approximately eight miles west of the town of Kinder in Allen Parish, Louisiana. More specifically the site entrance is located off Geeter Parker Road at 30.505316° North and 92.994914° West. The approximate center of the site is located at 30.509563° North and 92.985540° West. The site includes portions of Sections 21 and 28, T6S – R6W.

The site is predominantly loblolly pine tree farm plantation. The western and northern boundaries of the site are bordered by existing well-established second growth longleaf pine habitat of ecological significance. The eastern and southern boundaries of the site are bordered by loblolly and slash pine plantation tree farms. A swath of small stream forest bottomland hardwood habitat dissects the tract where Bunchs Creek enters and exits the northeast corner of the site.

SGMB currently contains 121.93 acres (Appendix A) of palustrine-forested wetlands, consisting predominately of bedded loblolly pine plantation, a small stream forest of bottomland hardwoods, a pipeline right-of-way (ROW), and one existing oil well site.

2.0 PROJECT GOALS AND OBJECTIVES

The purpose of the SGMB is to rehabilitate 137.74 acres and re-establish 2.21 acres of PF/S habitats and to preserve 19.08 acres of bottomland hardwood (BLH) habitats.

The goals of SGMB are as follows:

- Increase longleaf pine savannah habitat within its natural and historical range
- Increase biodiversity
- Provide habitat for wildlife, including threatened and endangered species
- Provide for water quality enhancement
- Provide for increased storm water storage in the Calcasieu River basin.

These goals will be achieved by introducing long-leaf seedlings, implementing a prescribed fire regime, controlling exotic and/or invasive species, and restoring the site hydrology to historical conditions as much as practical.

3.0 ECOLOGICAL SUITABILITY OF THE SITE/BASELINE CONDITIONS

This section describes the ecological suitability of the site to achieve the objectives of the proposed mitigation bank, including the physical, chemical, and biological characteristics of the bank site and how that site will support the planned types of aquatic resources and function, as stated in 33 CFR 332.8(d)(2)(vii)(B). This section provides the baseline/current site conditions on and adjacent to the proposed site.

3.1 LAND USE

3.1.1 Historical Land Use

Based on aerial photography, SGMB and the surrounding areas historically supported longleaf pine savannah and bottomland hardwood habitats, as defined in the Natural Communities of Louisiana published by the Louisiana Department of Wildlife (LDWF) and Fisheries, Louisiana Natural Heritage Program (LNHP). Based on 1952 aerial photography, PF/S occupied the poorly drained and seasonally saturated low flats (Figure 11, 1952 Aerial). It appears that longleaf pine (*Pinus palutstris*) was likely the dominant tree species on SGMB, with a diverse herbaceous component likely consisting of broomsedges (*Andropogon* spp.), panic grasses (*Panicum* spp.) three-awn grasses (*Aristida* spp.) plume-grasses (*Erianthus* spp.), beak-rushes (*Rhychospora* spp.), and yellow-eyed grasses (*Xyris* spp.). The habitat also likely supported a variety of forb species, such as lobelias (*Lobelia* spp.), gerardias (*Rhexia* spp.), milkworts (*Polygala* spp.), and bladderworts (*Utricularia* spp.).

Bottomland hardwoods occupied shallow, meandering depressional areas that crossed the northeast portion of SGMB in the Bunchs Creek floodplain. The dominant species likely consisted of laurel oak (*Quercus laurifolia*), red maple (*Acer rubrum*), water oak (*Quercus nigra*), sweet-bay (*Magnolia virginiana*), and southern bayberry (*Morella cerifera*). The larger bottomland hardwood inclusions on SGMB were, and currently are, located in depressions along the northeastern portion of the site along and adjacent to Bunchs Creek (Figure 15, 2004 Aerial).

Pre-impact hydrology was primarily attributed to backwater flooding from Bunchs Creek, rainfall and sheet flow. Aerial photography suggests that SGMB historically drained from north-northwest to southeast on the northern portion of the site, and west to east on the southern portion (Figure 8, Lidar Elevations).

During the mid-20th century, small areas of pine savannah were cleared within SGMB to construct oil and gas well pad infrastructure and associated access roads (Figure 12, 1974 Aerial). Additionally, aerial photography suggests that it was a common practice for areas of pine savannah in the vicinity of the site to be adapted to agricultural production using

levees to control hydrology. On-site hydrology was impeded by the access roads bisecting the natural drainage pathways on the site.

At the turn of the 21st century, SGMB again saw a land use change from open pine savannah to intensive tree farm timber production. Between 1998 and 2004 (Figures 14 and 15, 1998 and 2004 Aerial), the site was rowed into beds and planted with loblolly pine. Despite the construction of bedded rows, the resulting hydrologic conditions closely resemble those of pre-impact conditions. As is discussed later, the bedded rows restrict natural sheet flow on SGMB, though hydrology is largely prevalent on SGMB.

3.1.2 Existing/Current Land Use

The proposed mitigation bank site is currently managed as a tree farm with bedded loblolly pine plantation functioning in an impaired wetland state. The site consists of 0.5-1' tall and 3-4' wide rows of planted loblolly pine spaced on roughly 10-feet row intervals. Bunchs Creek meanders through the northeast corner of the site and its riparian forest and hardwood vegetation border the plantation rows (Figure 5, Current Vegetation Types). Additionally, there is a pipeline ROW within the site. It is approximately 70 feet wide, 3,365 linear feet long, and is maintained by Texas Eastern Transmission, LP via annual mechanical mowing. Additionally, an existing oil well pad and access road are located along the western property boundary. The lands within a 1-mile radius of SGMB are utilized for timber production, pasture, managed longleaf pine forest, and residential properties. Figure 2, Land Use/Land Cover, depicts land use/land cover within a 1-mile radius of SGMB.

Table 1: Pre-Restoration

Current Habitat Type	*Acres*
Loblolly and Slash Tree Farm	***139.95***
Bottomland Hardwood Swamp	***19.08***
Existing Pipeline ROW & Oil Well Pad	***6.07***

3.2 SOILS

The Natural Resource Conservation Service (NRCS) Web Soil Survey (Figure 7, USDA-NRCS Soils Map) shows that SGMB may be underlain by four soil map units: Caddo-Messer complex, 0 to 1 percent slopes (Cd); Glenmora silt loam, 1 to 3 percent slopes (GE); and Guyton silt loam, 0 to 1 percent slopes, occasionally flooded (Go); and Guyton and Cascilla soils, 0 to 2 percent slopes (GY). Table 2 depicts the soil map unit's individual soil components, component percentage, and hydric status within Allen Parish (NRCS Survey Area Data: Version 11, June 5, 2018). Below is a brief description of the soils from the Soil Survey of Allen Parish:

- Cd soils are complex consisting of small areas of Caddo and Messer soils that are so intermingled that they cannot be separated at the scale selected for mapping. These soils formed in loamy alluvium. Individual areas range from 40 to 400 acres. The landscape is one of flats and low mounds that are 30 to 50 feet wide and 1 to 4 feet high. Messer soil is on the mounds and Caddo soil is on the flats. Caddo soil makes up about 60 percent of each mapped area and the Messer soil makes up about 35 percent of each mapped area. Cd soils are listed as hydric in Allen Parish.
- GE soil is a very gently sloping, loamy soil formed in loamy alluvium on ridges and side slopes of stream terraces of the Pleistocene age. Individual areas are 40 to more than 500 acres. Ge soil is listed as non-hydric soil in Allen Parish.
- Go soil is level and loamy, formed in loamy alluvium on broad depressions of stream terraces. It is subject to occasional flooding. Individual areas range from 100 to more than 1,000 acres. Slopes are less than 1 percent. Go soil is listed as hydric in Allen Parish.
- GY soils are nearly level, loamy soils formed in loamy alluvium on floodplains of drainage ways. They are subject to frequent flooding. GY soils are in an irregular pattern on the landscape. Most mapped areas contain both soils, but a few areas contain only one. In mapped areas that contain both soils, Guyton soil is at lower elevations and in depressed areas. Cascilla soil is at higher elevation on natural levees that are mostly less than 1000 feet wide. Slopes are less than 1 percent. Guyon soil makes up about 55 percent of most mapped areas and Cascilla soil makes up about 30 percent of most mapped areas. Gy soils are listed as hydric in Allen Parish.

Table 2: Soil Map Unit Components and Hydric Status

Map Unit Name	*Acres*	*Hydric Status*	*Percent of Area*
Caddo-Messer complex	***119.2***	***Yes***	***72.2%***
Glenmora silt loam	***21.9***	***No***	***13.3%***
Guyton silt loam	***7.3***	***Yes***	***4.4%***
Guyton and Cascilla soils	***16.7***	***Yes***	***10.1%***

3.3 HYDROLOGY

3.3.1 Contributing Watershed

The SGMB is located within the Upper Calcasieu Watershed (USGS HUC 08080203) of the Calcasieu Basin, which includes portions of Allen, Beauregard, Calcasieu, Jefferson Davis, Natchitoches, Rapides, and Vernon Parishes (Figures 3 and 4, Pine Savanna Service Area and Bottomland Hardwood Service Area). SGMB will service HUCs 08080203, 08080204, 08080205, and 08080206 of the Calcasieu Basin. The Calcasieu Basin includes

the current and historic range of the western longleaf pine savannah, which has been reduced by 95 to 99% of its original extent.

3.3.2 Historical Hydrology and Drainage Patterns

Prior to oil and gas and silviculture activities, historical hydrology of the site generally followed the topography of the land, with rapid drainage along the northeast portion of the site directly into Bunchs Creek. Throughout the remainder of the site drainage flowed to the south and southeast into depressions and downstream tributaries of Bunchs Creek.

3.3.3 Existing/Current Hydrology and Drainage Patterns

Hydrology on the site is primarily attributed to backwater flooding from Bunchs Creek, rainfall, and sheet flow. Hydrology indicators observed on SGMB include inundated areas, saturated soil in the upper 12 inches, free water in the soil, water marks, drainage patterns of wetlands, and sediment deposits. (Figure 9, Current and Proposed Surface Hydrology).

Elevation contours show that SGMB naturally drains from north-northwest to southeast on the northern portion of the site, and west to east on the southern portion. However, the pine plantation that currently comprises the majority of acreage on SGMB is bedded into approximately 0.5-1' tall and 3-4' wide rows spaced on approximately 10-feet intervals. The beds on SGMB were installed using old techniques which utilized much smaller beds than compared to today's standard. While these beds have altered sheet flow and other localized hydrology characteristics to some extent, the overall wetland hydrology of the bedded wet flats appears to be essentially intact, as evidenced by the observed hydrology indicators. Lateral movement of water across the site is limited, as the majority of bedded rows are oriented north to south. In addition, the elevated road beds and associated drainage along the west boundary property line and the north central area of the property has altered sheet flow and other localized hydrology characteristics.

3.3.4 Jurisdictional Wetlands

USACE New Orleans District issued a Preliminary Jurisdictional Determination (JD) to St. Gabriel Resources on September 18, 2017 (MVN-2016-01056-SR). A copy of the preliminary JD is included as Appendix A.

The results of the wetland delineation identified 121.93 acres of wetlands and 2,450 feet of non-wetland waters (Bunchs Creek) that traverses the 165.13 acre site.

3.4 VEGETATION

3.4.1 Historical Plant Community

The site and the surrounding areas historically supported longleaf pine savannah and bottomland hardwood habitats, as defined in the Natural Communities of Louisiana published by LNHP. Based on 1952 aerial photography, pine savannahs occupied the

poorly drained and seasonally saturated low flats (Figure 11, 1952 Aerial). Longleaf pine was likely the dominant tree species on SGMB, with a diverse herbaceous component likely consisting of broomsedges, panic grasses, three-awn grasses, plume-grasses, beak-rushes, and yellow-eyed grasses. The habitat also likely supported a variety of forb species, such as those previously mentioned in Section 3.1.1.

Bottomland hardwoods occupied shallow depressions including the areas that crossed the northeast portion of SGMB. The dominant species likely consisted of laurel oak, red maple, water oak, sweet-bay, and southern bayberry. The larger bottomland hardwood inclusions on SGMB were, and currently are, located in depressions along the northeastern portion of the site adjacent to Bunchs Creek.

Pine savannas were cleared on the site between 1974 (Figure 12, 1974 Aerial) and 1985 (Figure 13, 1985 Aerial). The time period between 1985 and 1998 does not show any discernable change in habitat and thus vegetation. Between 1998 (Figure 14, 1998 Aerial) and 2004 (Figure 15, 2004 Aerial), the site was rowed into beds and planted with loblolly pine which resulted in the creation of an intensively managed tree farm.

3.4.2 Existing Plant Community

Loblolly pine (*Pinus taeda*) plantation occupies the majority of the site. Based on the wetland delineation this habitat is dominated by loblolly pine in the tree stratum (30-40% absolute cover); wax myrtle (*Morella cerifera*) (30% absolute cover) and Chinese Tallow (*Triadica sebifera*) (15% absolute cover) in the sapling/shrub stratum; Small Fruit Spike Rush (*Eleocharis microcarpa*), Little Bluestem (*Schizachyrium scoparium),* and Dogfennel *(Eupatorium capillifolium)* in the herb stratum; and blackberry (*Rubus argutus*) in the woody vine stratum. The average diameter at breast height (DBH) of the loblolly pines is 7-12", wax myrtle 1-3", and Chinese Tallow 0.5-3". Chinese Tallow is an exotic/invasive species.

Bottomland hardwood habitat exists in the northeast corner of the site along Bunchs Creek. This habitat consists of laurel oak (*Quercus laurifolia)* (20% absolute cover), sweet gum (*Liquidambar styraciflua)* (10-20% absolute cover), , Drummond red maple (*Acer rubrum var. drummondii)* (20% absolute cover), and Chinese Tallow (*Triadica sebifera*) (20% absolute cover) in the tree stratum; American Elm (*Ulmus americana)* (20% absolute cover) and deciduous holly (*Ilex decidua)(5% absolute cover)* in the sapling shrub stratum*;* lamp rush (*Juncus effusus*), laurel-leaf greenbrier (*Smilax laurifolia),* and sedges (*Carex spp.*) in the herb stratum.

3.5 GENERAL NEED FOR THE PROJECT IN THIS AREA

As noted in the *Natural Communities of Louisiana*, western longleaf pine savannahs provide critical habitat for many animal and plant species (LNHP, 2009). At the beginning of the 17th century, there were an estimated 90 million acres of longleaf pine forests with nearly 900 different plant species in the southeastern United States. In western Louisiana, the historic range of longleaf pine included all or parts of Acadia, Allen, Avoyelles,

Beauregard, Calcasieu, Evangeline, Jefferson Davis, Natchitoches, Rapides, Sabine, St. Landry, and Vernon Parishes. The habitat type has been reduced by 95-99% of its original extent in the Lower West Gulf Coastal Plain ecoregion in the southwest and west central portions of Louisiana. Threats to western longleaf pine savannahs include construction of roads, pipeline or utilities, conversion to agricultural pasture and cropland, conversion to loblolly and Slash pine plantations, fire exclusion or inappropriate fire regimes, use of chemical herbicides or fertilizers, invasive or alien species, and hydrological alterations.

America's Longleaf Restoration Initiative (ALRI) was launched in 2009 through collaboration with many stakeholders, including non-governmental organizations, state and federal agencies, private industry, universities and research extensions, and private landowners. The 15-year goal of the ALRI is to increase longleaf pine acreages by 3.4 to 8.0 million acres. In 2010, the NRCS established the Longleaf Pine Initiative (LLPI) to collaborate with landowners to restore longleaf forests in support of the ALRI (Figure 10, Historical Longleaf Pine Range and LLPI Map). The goal of the LLPI is to restore an additional 4.6 million acres of longleaf pine ecosystems in their natural range by 2025. Within Louisiana, Allen Parish, along with Beauregard, Tangipahoa, St. Tammany, Vernon, and Washington Parishes, is listed as a priority area by NRCS for longleaf pine restoration. The restoration and preservation of longleaf pine habitat within SGMB is consistent with and supports the goals of both the ALRI and the LLPI.

Increasing development within the Calcasieu Basin calls for high quality mitigation to offset unavoidable impacts to longleaf pine savannah and bottomland hardwood habitats. According to a study conducted for the SWLA Economic Development Alliance, approximately $65 billion in capital investment is planned in southwest Louisiana, consisting of Allen, Beauregard, Calcasieu, Cameron, and Jefferson Davis Parishes. It is predicted that southwest Louisiana, most of which is located within the Calcasieu River Basin, could see an increase of 50,000 new residents by the year 2020 because of this investment (Adrian and Icaza).

Additionally, federally-listed red-cockaded woodpecker (*Picoides borealis*), American chaffseed (*Schwalbea Americana*), the candidate species Louisiana pine snake (*Pituophis ruthveni*), and twenty other species of conservation concern within Louisiana, rely on longleaf pine savannah habitats for survival.

4.0 ESTABLISHMENT OF A MITIGATION BANK

The Sponsor proposes to rehabilitate 91.98 acres of wetland longleaf pine savannah, 36.74 acres of upland longleaf pine, and 9.02 acres of flatwoods pond habitats, to re-establish 1.65 acres of pine savannah wetlands and 0.56 acres of pine savannah uplands; and to preserve 14.70 acres of BLH wetlands and 4.38 acres of BLH uplands (Figure 6, Mitigation Features).

Table 3 contains post-construction habitats and acreage descriptions for the proposed re-establishment, rehabilitation, and preservation of wetlands and upland buffers associated

with the 165.13 acre tract, as well as areas not proposed for re-establishment, rehabilitation, and preservation.

Table 3: Post-Construction Habitat Acreage Summary

Habitat/Area	Mitigation Type	Acres
Pine Savannah Wetlands	Rehabilitation	91.98
Pine Savannah Uplands	Rehabilitation	36.74
Flatwoods Pond Wetlands	Rehabilitation	9.02 (part of Pine Savannah Wetlands)
Pine Savannah Wetlands	Re-establishment	1.65
Pine Savannah Uplands	Re-establishment	0.56
BLH Wetlands	Preservation	14.70
BLH Uplands	Preservation	4.38
Non-mitigation Features		6.07
SGMB	**Total Acres of Site**	**165.1**

4.1 SITE RESTORATION PLAN

4.1.1 Soils/Hydrologic Work

While the existing hydrology on SGMB is somewhat intact, bedded plantations of loblolly pine present on much of the tract, approximately 147 acres, artificially restrict lateral sheet flow. As previously stated, prior to planting of loblolly pine, bedded rows were created 0.5 to 1.0 feet tall and approximately 3 to 4 feet wide, and are situated roughly 10 feet apart (Figure 9, Current Surface Hydrology). During normal commercial logging operations, the bedded rows are typically mechanically leveled when timber is clear cut during final harvest. However, to ensure that SGMB is restored to natural grade, an inspection will be conducted after loblolly removal to determine if mechanical harvest equipment has effectively leveled the rows. In the event that remnant rows exist after logging, a mechanical drum chopping technique will be used to remove the remaining elevated rows. In addition, existing elevated road beds and associated drainage located on the western boundary and north central area of the tract will be mechanically leveled to natural original grade (Figure 17, Cross Sectional Plan View & Figures 18 through 21, Cross Sections) in an effort to restore sheet flow to historic natural conditions. Once all beds and roads are removed and natural grade restored, SGMB will drain from north-northwest to southeast on the northern portion of the site, and west to east on the southern portion. Additionally, a 16” culvert will be installed in the portion of the access road that will remain for pipeline ROW and well pad access. The culvert will be installed within the flatwoods pond area to allow hydrologic connectivity.

4.1.2 Vegetative Work

Longleaf pine savannah re-establishment and rehabilitation areas, and the bottomland hardwood protection area, were determined by historic vegetation patterns and elevation contours. Based on historic aerial imagery (Figure 11, 1952 Aerial Photograph and Figure 8, Lidar Elevation) bottomland hardwoods on and adjacent to the northeastern portion of the tract were confined to 36' NGVD and lower. As seen in historic aerial photography, these elevations correspond to the riparian areas along Bunchs Creek.

Following mechanical harvest of loblolly pine and hydrologic restoration, longleaf pine seedlings will be planted on approximately 139.95 acres for rehabilitation (93.63 acres of longleaf pine savannah wetlands, 37.3 acres of upland longleaf pine, and 9.02 acres of flatwoods pond habitat) during the standard planting season (December-March). As lower planting densities are optimal for longleaf pine ecosystem restoration, seedlings may be planted using 12 X 12 spacing for an initial stocking level of 302 trees per acre, or may be planted in cohorts or patches where a well-developed grassy ground cover is in place, averaging 25 to 50 trees per cohort, or may be planted in a linear fashion in areas lacking well-developed grassy ground cover where follow-up chemical release of seedlings will be necessary. A prescribed fire will be conducted prior to planting seedlings. A minimum of 50 trees per acre must survive through the end of the spring following planting (i.e. Year 1). A minimum of 40 longleaf pine seedlings/saplings per acre must have survived through three growing seasons. These must exhibit at least four consecutive years (after one-year survivorship) of annual increase in stem ground diameter or height from ground to bud tip. Herbaceous understory will be re-established through natural recruitment. The native ground cover communities that historically characterized the great majority of the bank have been severely impacted by the pine plantation management. Prescribed fire will be a critical management tool in re-establishing the native grasses, forbs, and herbaceous plants. Burning is essential for rehabilitation/perpetuation of grass-herbaceous ground-cover communities. Among other effects, properly timed fires stimulate native grasses and herbaceous plants to grow vigorously, flower and produce seeds, stimulate longleaf pine to grow out of the "grass-stage", and control brown spot needle-blight on young longleaf. By Year 5 (four years following attainment of the one-year survivorship criteria for longleaf seedlings, at least two prescribed burns should have occurred throughout the pine savannah habitat and at least one along the margins of and into flatwood ponds. In order to safely and effectively conduct these prescribed burns, fire breaks will be constructed. Existing fire breaks will be rehabilitated (Figures 20 and 21, Cross Sections).

Additionally, approximately 19.08 acres of BLH habitat (14.70 acres of BLH wetlands and 4.38 acres of BLH uplands) will be preserved under the Conservation Servitude.

4.2 TECHNICAL FEASIBILITY

The construction work required to accomplish re-establishment, rehabilitation and preservation on SGMB is routine in nature and feasible, consisting primarily of removal of bedded rows and roads in order to return the site to its pre-intensive tree farm hydrologic conditions, as well as vegetative plantings of native longleaf pine. The mapped soil types

of Caddo-Messer Complex and Guyton Silt Loam, occasionally flooded (Figure7, Soils Map), are historically supportive of the native wetland forested communities for re-establishment and rehabilitation. This is supported by the existence of well-established longleaf pine stands of ecological significance immediately adjacent to SGMB. Additionally, a majority of the soils are mapped as hydric, indicating the site formed under hydric conditions and therefore historically supported wetlands.

4.3 CURRENT SITE RISKS

Current site risks on the SGMB include an existing pipeline ROW, an existing oil well pad and access road, and a proposed pipeline ROW. The existing pipeline ROW that is located within the SGMB crosses from the central portion of the site to the northeast. It is approximately 70 feet wide, 3,365 linear feet long, and is maintained by Texas Eastern Transmission, LP via annual mechanical mowing. A proposed pipeline ROW is planned to follow the existing ROW and will include an additional 50 feet on the north side of the existing ROW (Figure 6, Mitigation Features). The pipeline ROW acreage has been excluded from the restoration plan acreage, but will be within the conservation servitude boundary. Although the ROW will not be subordinate to the conservation servitude while the pipelines are operational, it will be protected by the conservation servitude in the event the ROW servitudes are terminated.

One existing well pad and associated access road is located near the western and northern boundaries of the tract (Appendix B, Survey Plat). The well pad and access road encompass 0.38 acre of land and has been excluded from the restoration plan acreage, but will be within the conservation servitude boundary. Although the well pad will not be subordinate to the conservation servitude while the well is operational, it will be protected by the conservation servitude in the event the well is plugged and abandoned. According to the Louisiana Department of Natural Resources Strategic Online Natural Resources Information System (SONRIS), six oil and gas wells are located within the SGMB project area. Three of the wells have been plugged and abandoned, and the remaining two were not put into service and the permits have since expired.

4.4 LONG-TERM SUSTAINABILITY OF THE SITE

Long-term viability and sustainability of the SGMB will be ensured through active and adaptive management including, but not limited to, fire management regime, invasive species control, appropriate monitoring, and long-term maintenance. Southwestern Allen Parish is home to some of the largest protected pine savannahs in southwest Louisiana, including the Clear Creek Mitigation Bank, Parkers Longleaf Natural Area, TNC’s CC Road Savannah Preserve, and the Calcasieu Mitigation Bank. In addition, two longleaf pine USDA NRCS EQIP and CSP contracts are located directly adjacent to SGMB, suggesting a high probability for sustainability and connectivity of SGMB.

5.0 PROPOSED SERVICE AREA

The Bank is established to provide compensation for impacts to longleaf pine savannah, pine flatwoods, flatwood ponds, and bottomland hardwood communities intermingled with slight rises and low ridges of longleaf pine (collectively pine flatwoods/savannah habitat). The Calcasieu Basin which consists of USGS Hydrologic Cataloging Units: 08080203 (Upper Calcasieu), 08080204 (Whisky Chitto), 08080205 (West Fork Calcasieu), and 08080206 (Lower Calcasieu) will serve as the primary service area. The Lower Calcasieu unit was included because the historic longleaf pine range dipped south into Calcasieu Parish as far south as the communities of Vinton, Sulphur, and Moss Bluff.

6.0 OPERATION OF THE MITIGATION BANK

This section describes how the proposed Bank will be operated, as stated in 33 CFR 332.8(d)(2) (ii) and provides details on the proposed ownership arrangements and long-term management strategy for the mitigation bank, as stated in 33 CFR 332.8(d)(2) (v.)

6.1 PROJECT REPRESENTATIVES

Sponsor/Landowner:	St. Gabriel Resources, LLC P.O. Box 57 Ragley, Louisiana 70657 Point of Contact: David R. Daigle daviddaigle@aol.com (337) 884-3116
Agent:	Southland Environmental, LLC 510 Clarence Street Lake Charles, Louisiana 70501 Point of Contact: Cleveland R. Hoffpauir cleve@southlandenv.com (337) 436-3248

6.2 QUALIFICATIONS OF THE SPONSOR

David R. Daigle received a Bachelor's Degree in Microbiology in 1974 and a Master's Degree in Environmental Science from McNeese State University in 1980. He successfully established Barnes Creek Mitigation Area in 1998, then Wolf Creek Mitigation Area and Clear Creek Mitigation Bank. Through his company Wildlands, Inc., Daigle provided assistance to landowners in the establishment of the Bill Jackson Mitigation Bank, Lacassane Coastal Prairie Mitigation Bank, and the Calcasieu Mitigation Bank. He has participated in the restoration and management of over 9,000 acres of fire dependent coastal prairie and pine savannah habitats in southwest Louisiana. To insure long-term protection of its ecological value, the Daigle family has placed over 50% of their properties in conservation servitudes. Five tracts of land owned by the Daigle family are recognized by the LDWF-LNHP, as outstanding natural resource areas.

The David R. Daigle Family and Daigle Farms has received numerous awards and recognitions for outstanding conservation, land stewardship, and wildlife habitat management. They received the Good Land Use Award from the Louisiana Chapter of Soil and Water Conservation Society, the Environmental Stewardship Award (Region II-Southeastern US) from the National Cattlemen's Association, The Gjerstad/Johnson Landowner of the Year Award from the Longleaf Alliance, and the Private Landowner Conservation Champion Award from the Lower Mississippi Valley Joint Venture.

Mr. Daigle currently serves as the President of the Louisiana Association of Conservation Districts, Chairman of the Calcasieu Soil and Water Conservation District, Chairman of the Louisiana Grazing Lands Conservation Coalition, and serves on the Board of Directors of the National Association of Conservation Districts. He is a founding member of the Coastal Plain Conservancy Corporation, a non-profit land trust, and is an active member of several other natural resource and conservation organizations. He is co-author of the publication *Prescribed Grazing: A Management Tool for Wetlands*. The publication was written to promote awareness and recognition of the distinctive historical, cultural, and natural resources of the gulf coast regional grasslands. The publication serves as a resource for land managers to better understand how targeted cattle grazing can be used as a tool to biomimic the natural forces of historic large grazing and browsing herbivores such as bison and elk and how this grazing biomimicry, used in conjunction with fire, is an indispensable tool for the long-term management of southern grassland ecosystems of longleaf pine savannah, coastal prairie, and coastal marshlands.

6.3 PROPOSED LONG-TERM OWNERSHIP AND MANAGEMENT REPRESENTATIVES

The property owner (Owner) is the Sponsor (St. Gabriel Resources, LLC (SGR)). The Sponsor has owned the property for four years. The Sponsor currently plans to be the Long-Term manager but may appoint a Long-Term Steward in accordance with 33 CFR 332.7 (d.) and approval from the CEMVN.

6.4 SITE PROTECTION

To ensure sustainability of the resource, SGR shall burden the 165.13-acre SGMB with a perpetual conservation servitude. SGR shall execute a perpetual conservation servitude (pursuant to the Louisiana Conservation Servitude Act, R.S. 9:1271 et seq.) on all acreage identified as the Bank (Figure 22, Conservation Servitude Map). SGR will utilize a not-for-profit conservation entity as the holder of the conservation servitude. A copy of the conservation servitude will be filed in the real estate records of the Mortgage and Conveyance Office of Allen Parish and shall be provided to the USACE for review and approval prior to filing. After filing, a copy of the recorded conservation servitude, clearly showing the book, page, and date of filing, will be provided to the USACE.

6.5 LONG-TERM STRATEGY

As stated above the Sponsor will provide long-term management consisting of monitoring, vegetation management via a prescribed fire regime, invasive species control, boundary maintenance (approximately 2.5 miles), site protection, and the funding of management activities. Prescribed burns will be conducted on a two to three-year basis and primarily during the growing season to mimic historical wildfire occurrences (late May-June). Burns will be conducted at other times of the year to mimic natural heterogeneity within the ecosystem. The wetland habitats will be managed to increase and maintain the biological, chemical, and physical wetland functions of the SGMB and to provide forested habitat capable of supporting populations for priority wildlife species (e.g., native wildlife, Nearctic-Neotropical migrants, and the red cockaded woodpecker).

A long-term management plan will be included with the Draft Mitigation Banking Instrument which will detail long-term management needs and costs, and identify a funding mechanism in accordance with 33 CFR 332.7 (d). The Sponsor (or Long-term Steward) and the Owner (or its heirs, assigns, or purchasers) shall be responsible for protecting lands contained within the SGMB in perpetuity.

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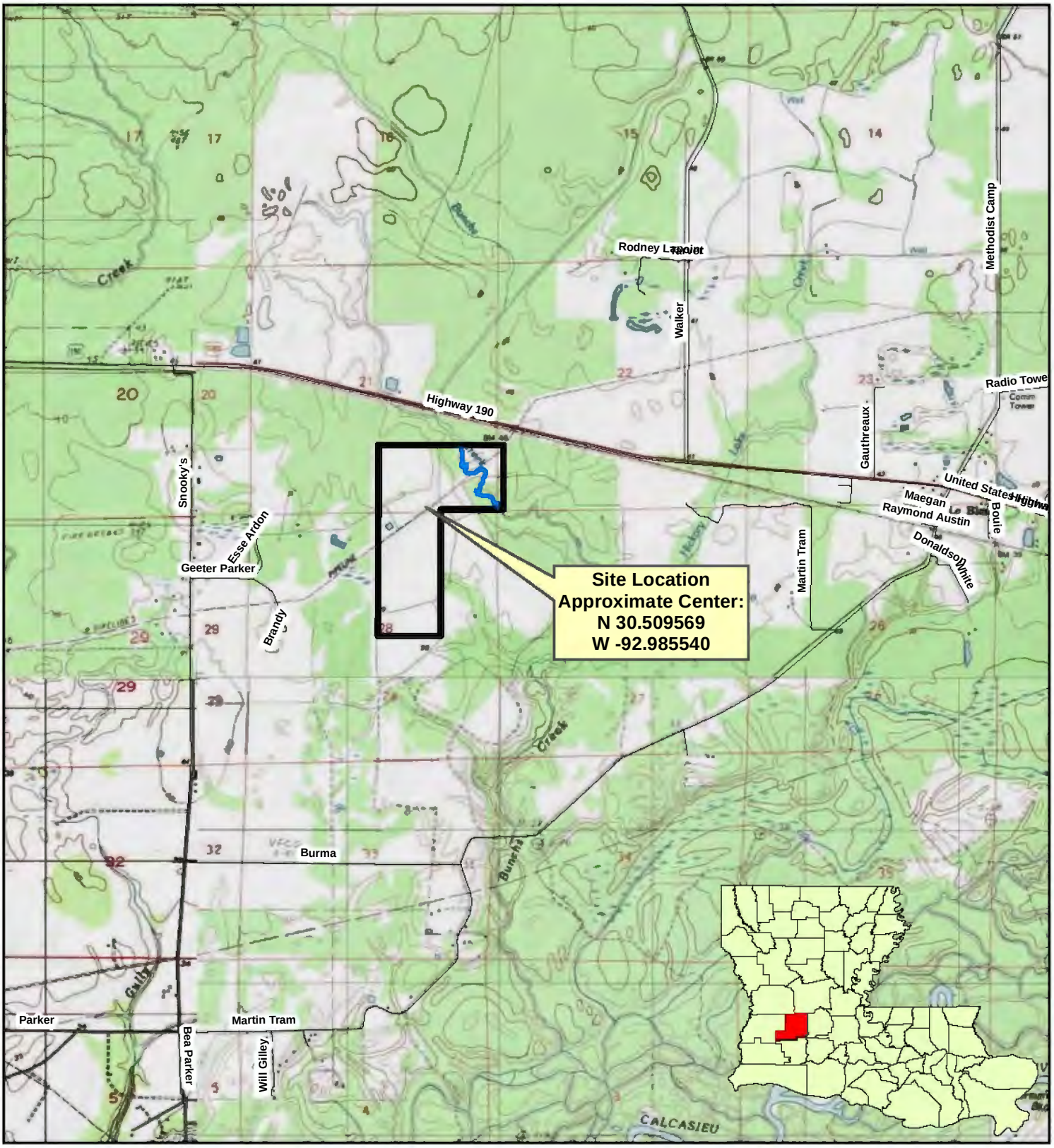
FIGURES



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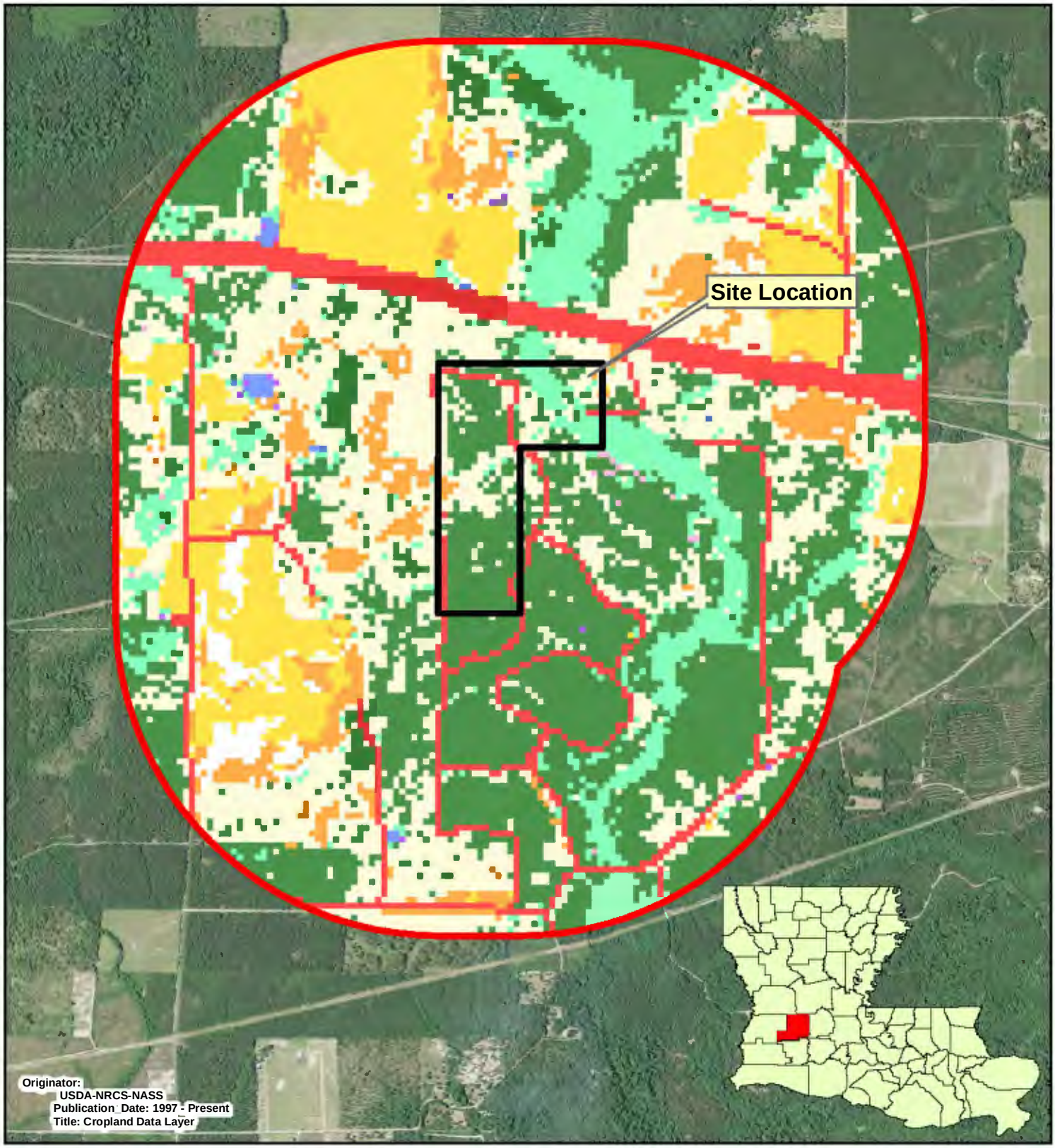
St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 1
Site Location Map
7.5' USGS Quadrangle Map

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/07/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:



Feet

0 1,500 3,000 6,000

- Approximate Site Boundary
- 1 Mile Buffer
- Barren
- Deciduous Forest
- Developed
- Evergreen Forest
- Fallow/Idle Cropland
- Grassland/Pasture
- Herbaceous Wetlands
- Mixed Forest
- Open Water
- Other Hay/Non Alfalfa
- Shrubland
- Woody Wetlands

N W E S

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SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 2
Land Use/Land Cover Within 1 Mile

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

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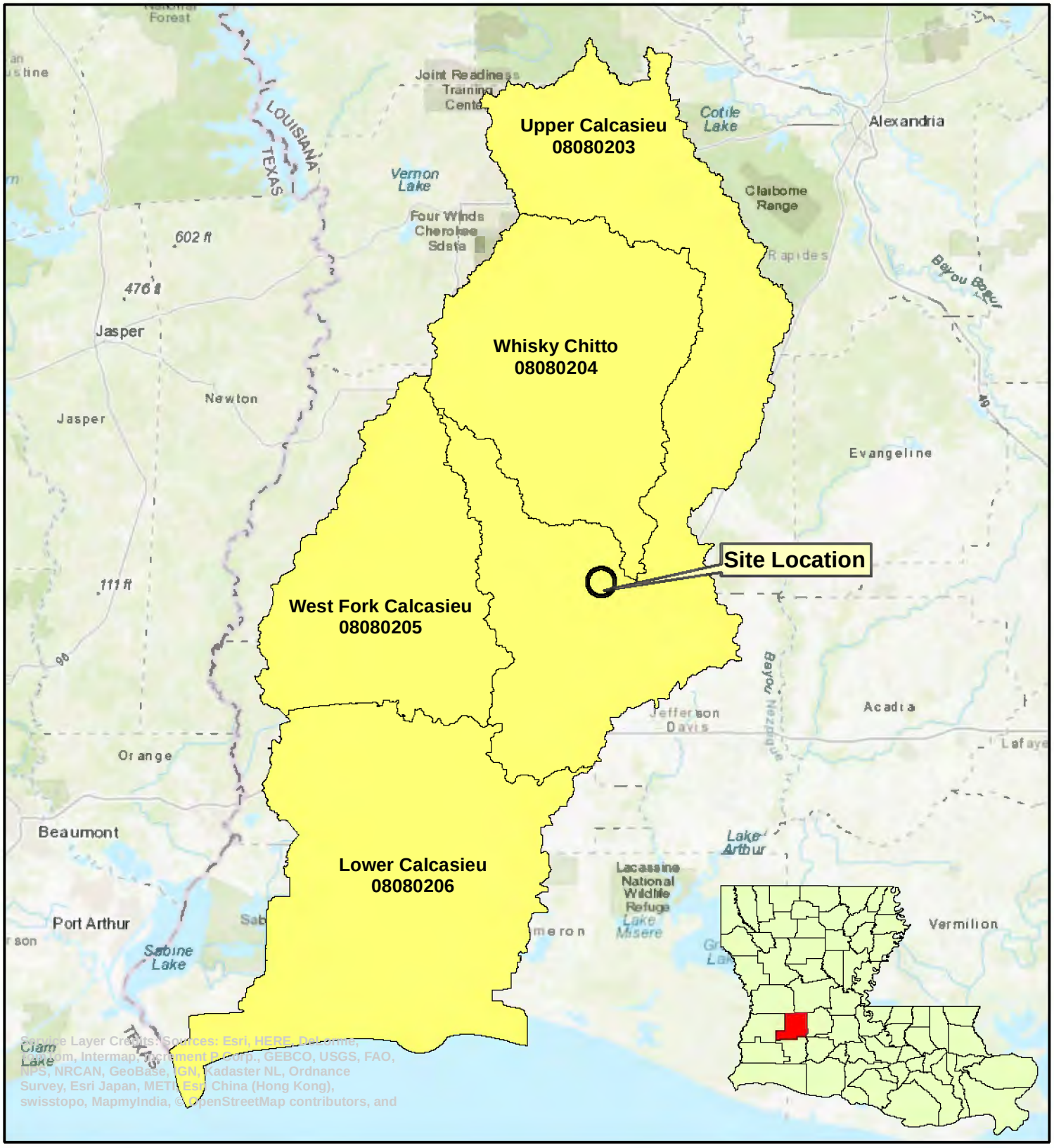
Checked By: CRH	Date: 12/11/18	Revised:



Miles

0 10 20 40

Watershed Boundary Dataset (WBD) was provided by the USDA-NRCS, USGS and EPA along with other federal, state and local agenciesies.

Project Area

Pine Savanna Service Area

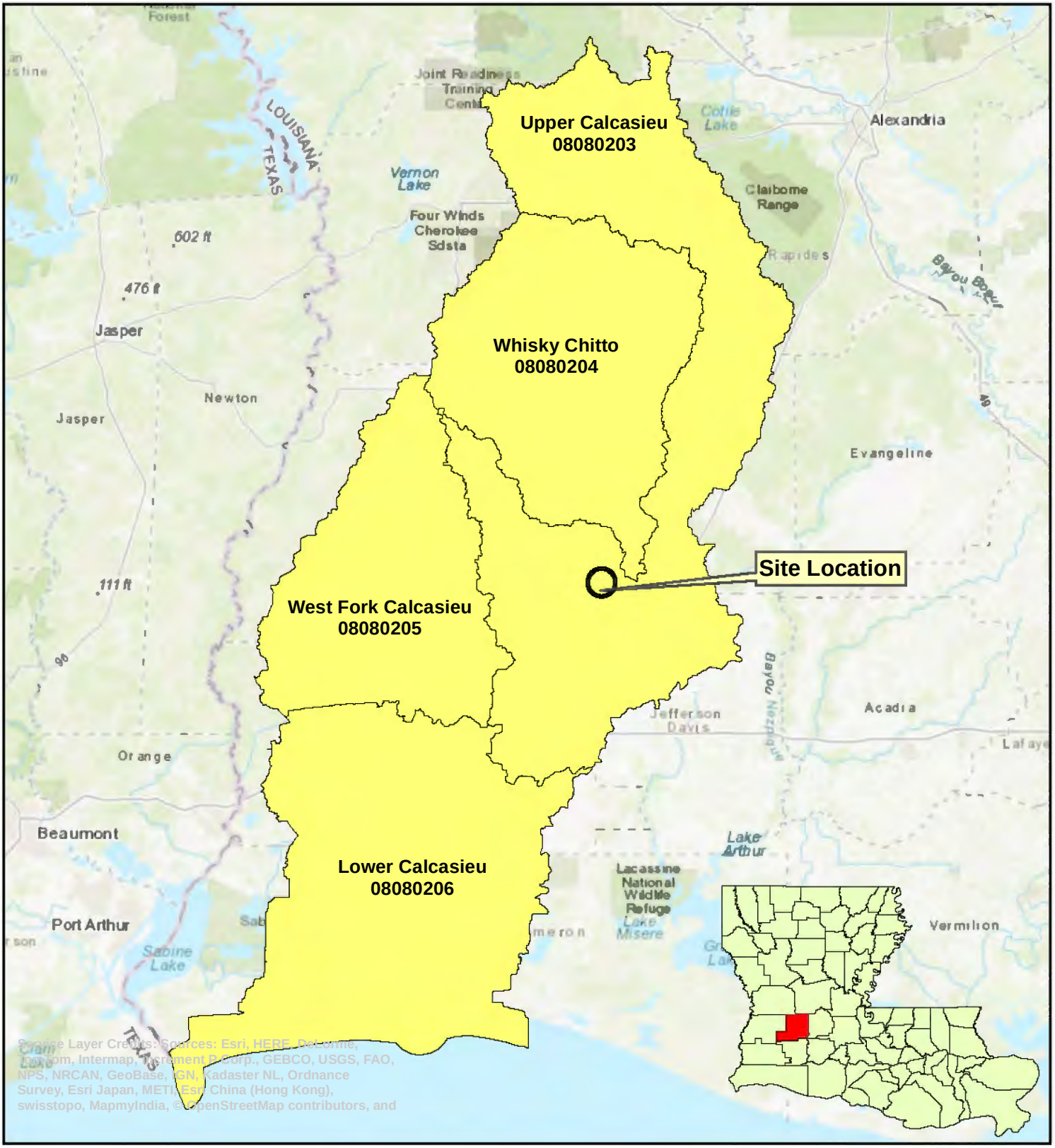
N W E S

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 3
Pine Savanna Service Area

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/07/18	Project # 11732	
Checked By: CRH	Date: 12/11/18	Revised:	



0 10 20 40 Miles

N
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Watershed Boundary Dataset (WBD) was provided by the USDA-NRCS, USGS and EPA along with other federal, state and local agenciesies.

Project Area

Bottomland Hardwood Service Area

ST. GABRIEL RESOURCES, LLC

SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 4
Bottomland Hardwood Service Area

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

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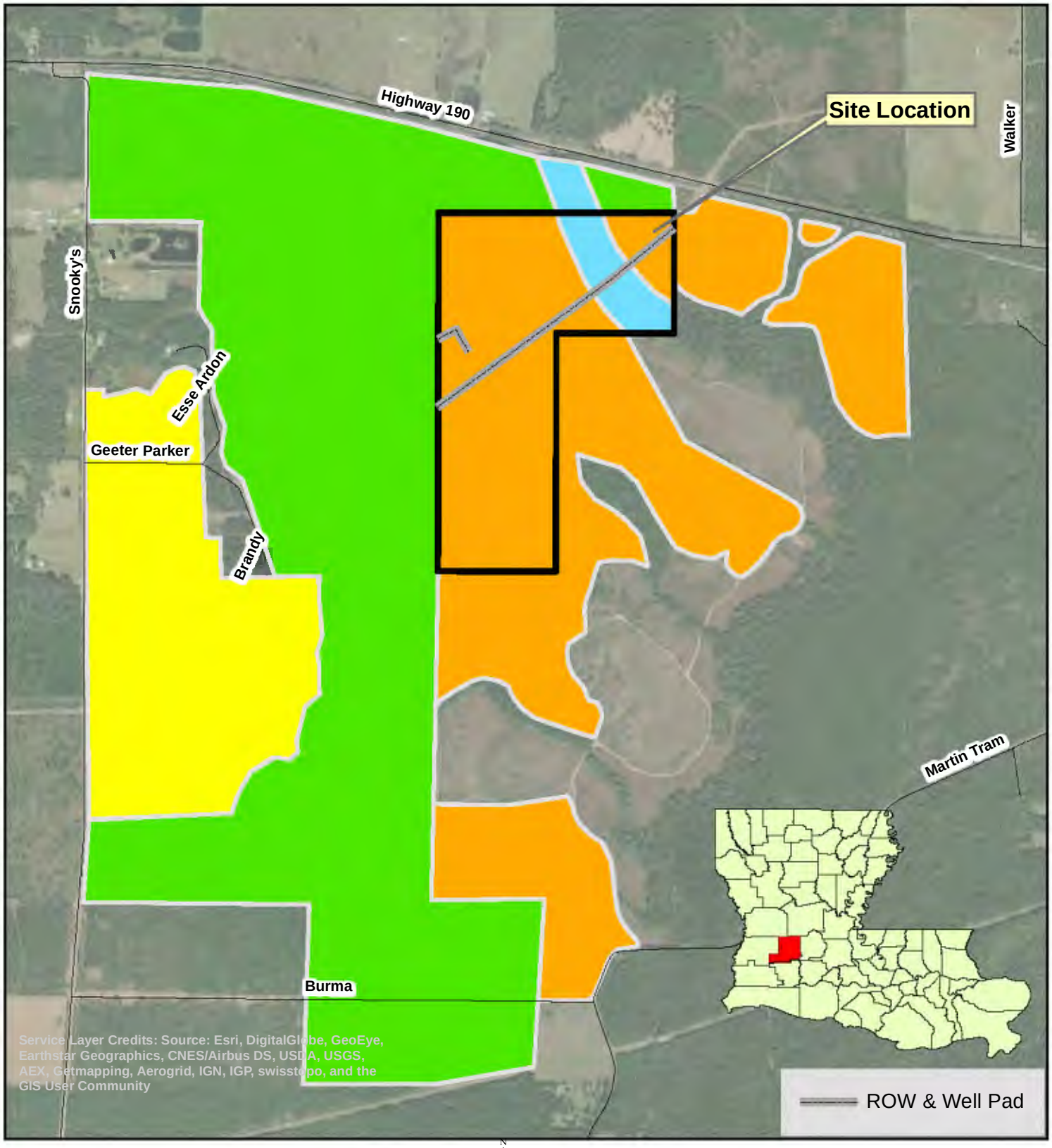
Checked By: CRH	Date: 12/11/18	Revised:



ST. GABRIEL RESOURCES LLC

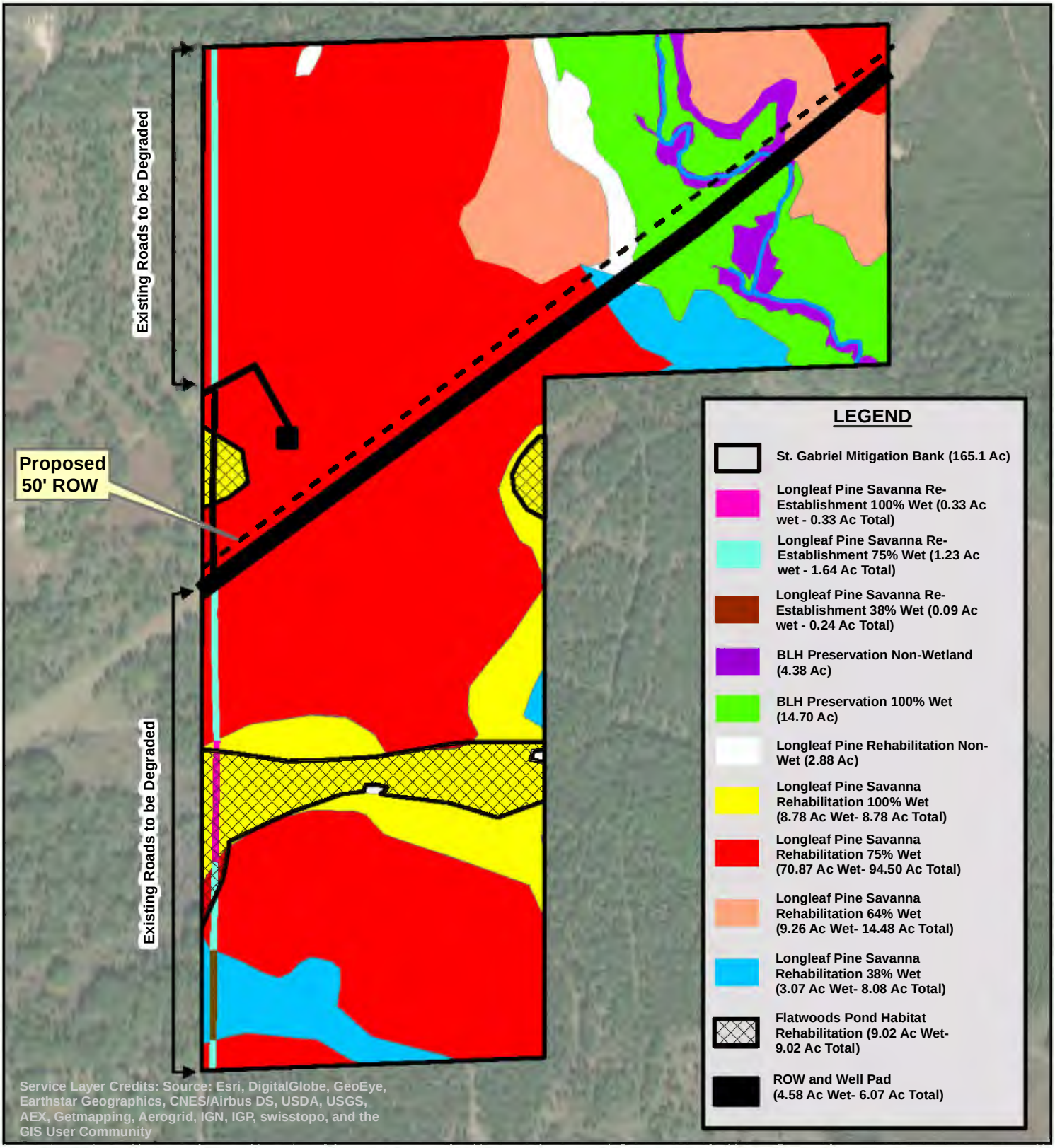
SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 5
Current Vegetation Types

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/07/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:



St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 6
Mitigation Features

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

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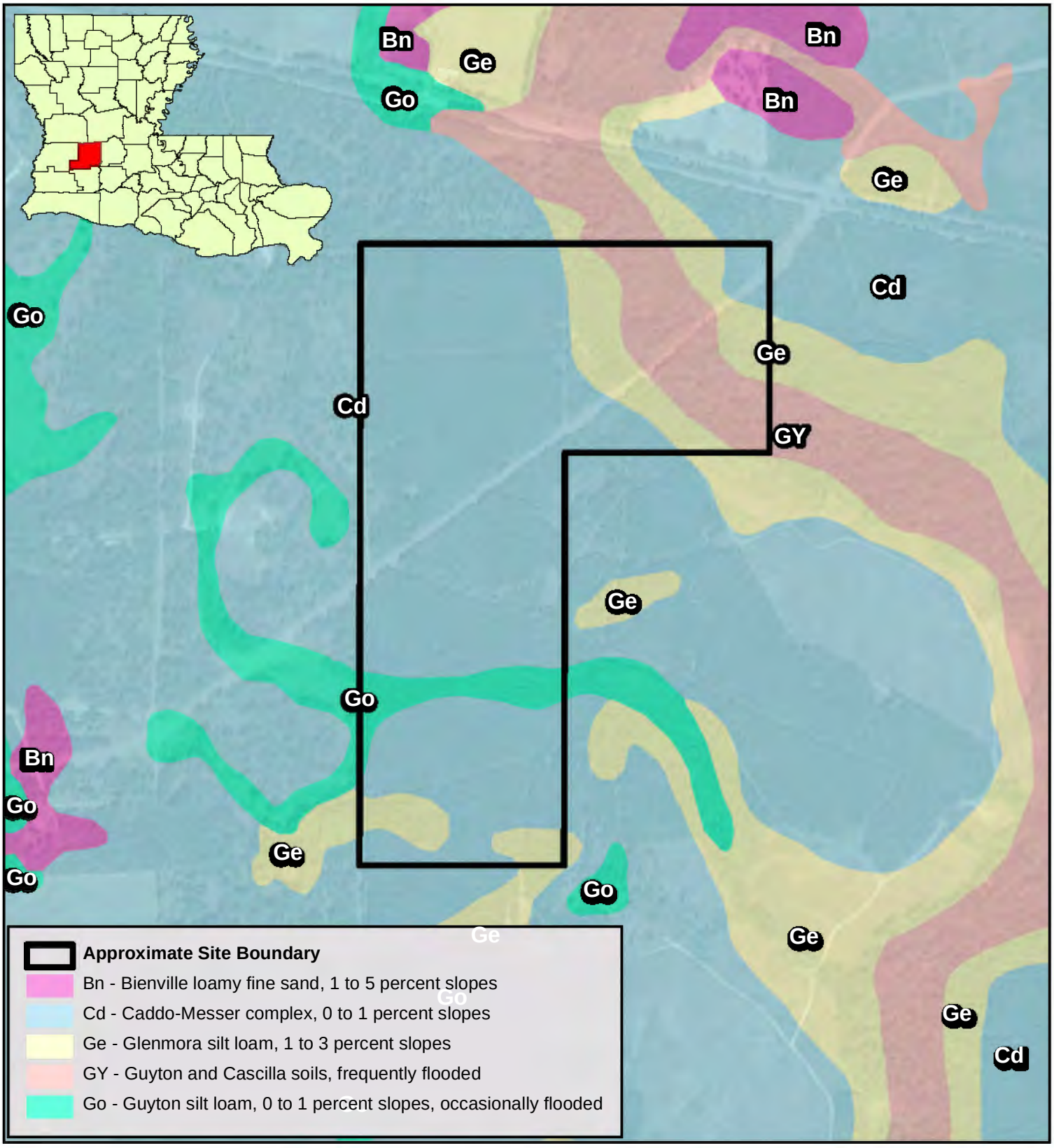
Checked By: CRH	Date: 12/11/18	Revised:



Feet
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Source: U.S. Department of Agriculture,
Natural Resources Conservation Service
Publication_Date: 2005

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

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St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 7
USDA-NRCS Soils Map

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

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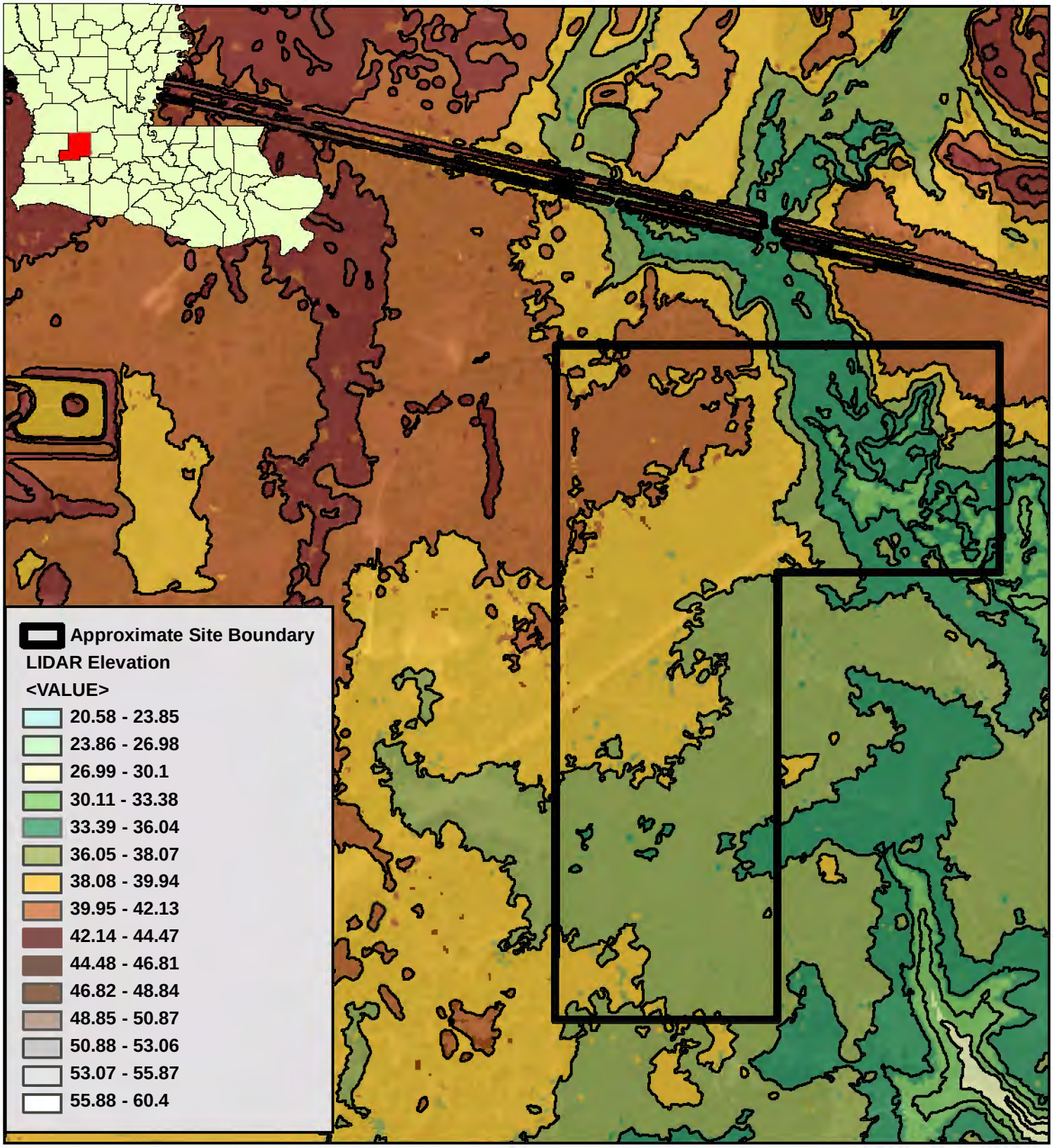
Checked By: CRH	Date: 12/11/18	Revised:



Data distributed by "Atlas: The Louisiana Statewide GIS ." LSU CADGIS Research Laboratory, Baton Rouge, LA, 2006. http://atlas.lsu.edu

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SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 8
LIDAR Elevations

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

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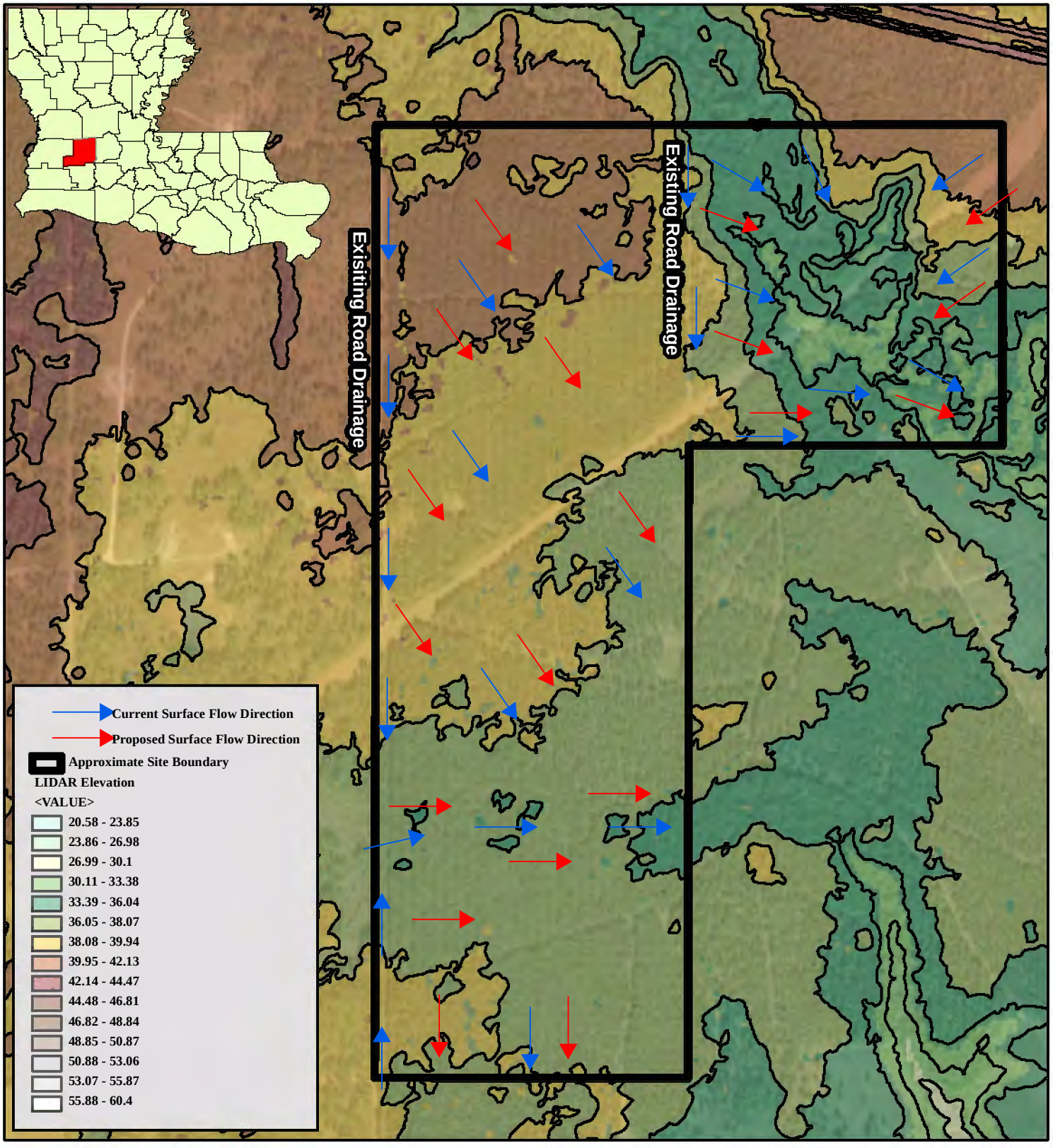
Checked By: CRH	Date: 12/11/18	Revised:	



Feet

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Data distributed by "Atlas: The Louisiana Statewide GIS. " LSU CADGIS Research Laboratory, Baton Rouge, LA, 2006. http://atlas.lsu.edu

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

N W E S

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SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 9
Current & Proposed Surface Hydrology

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

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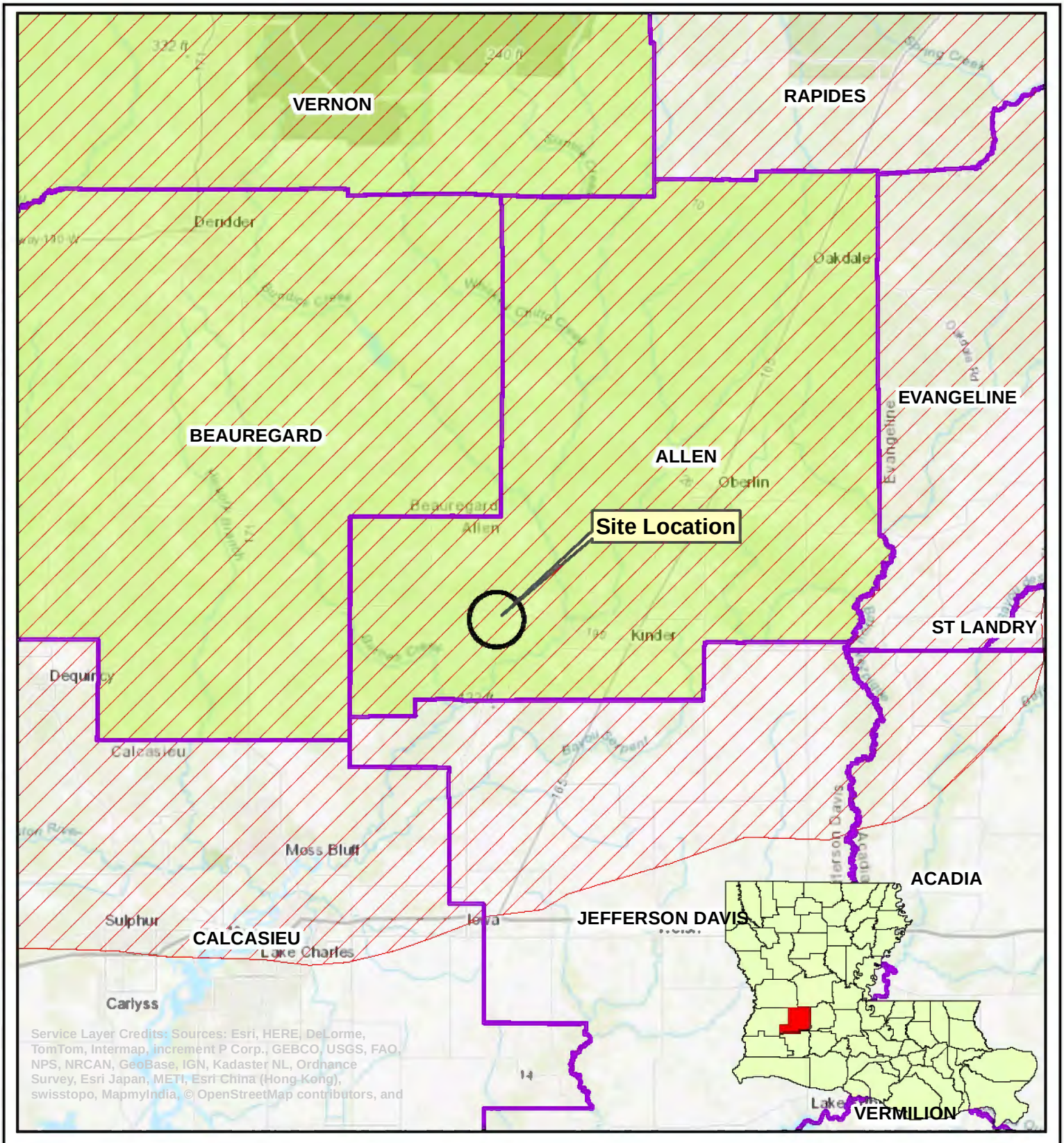
Checked By: CRH	Date: 12/11/18	Revised:



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St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 10
Historical Longleaf Pine Range & LLPI Map

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

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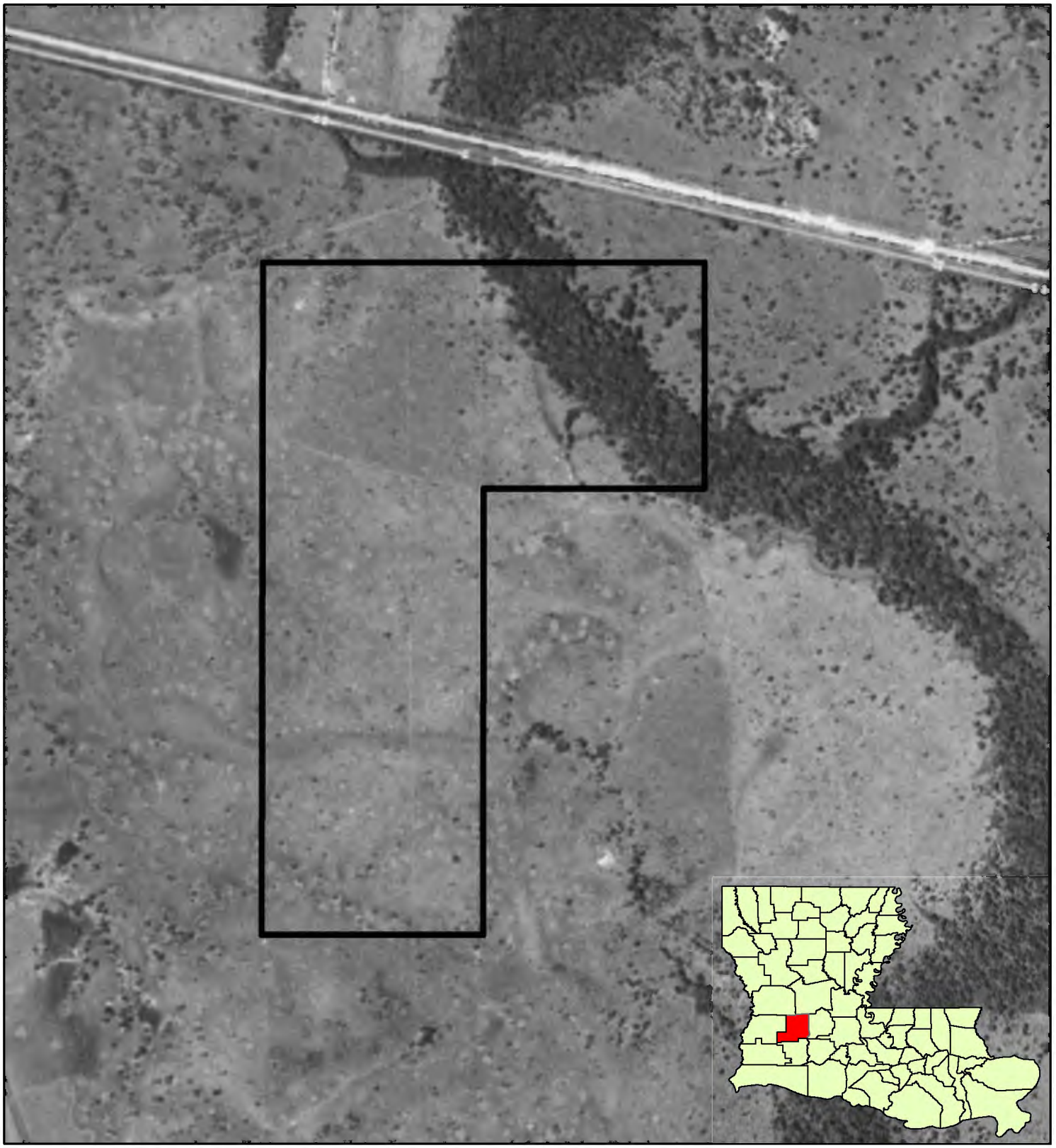

Feet
0 500 1,000 2,000

Service Layer Credits:

Approximate Site Boundary

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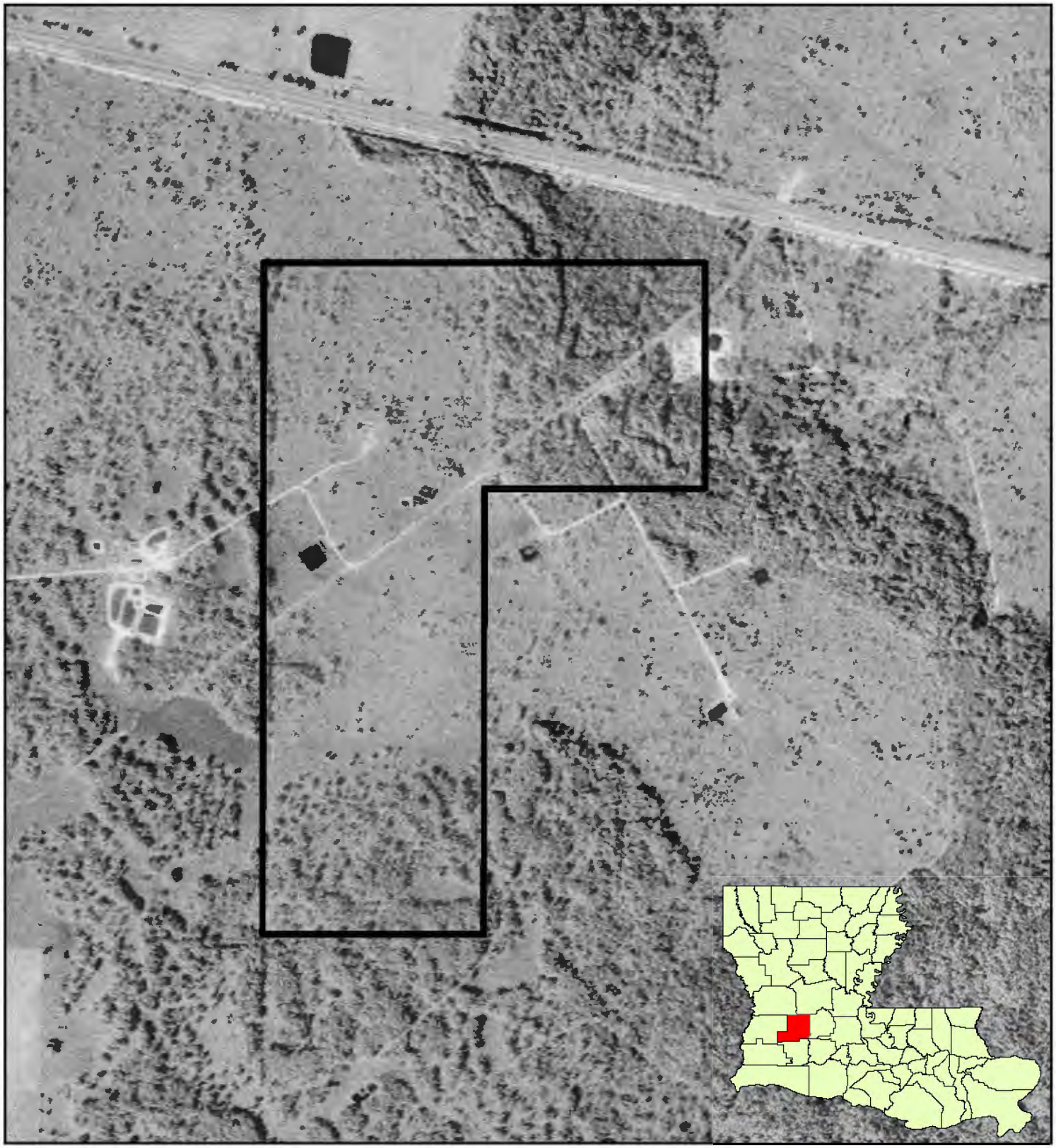
SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 11
1952 Aerial Photograph

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/11/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:



Feet
0 500 1,000 2,000

Service Layer Credits:

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Approximate Site Boundary

ST. GABRIEL RESOURCES LLC

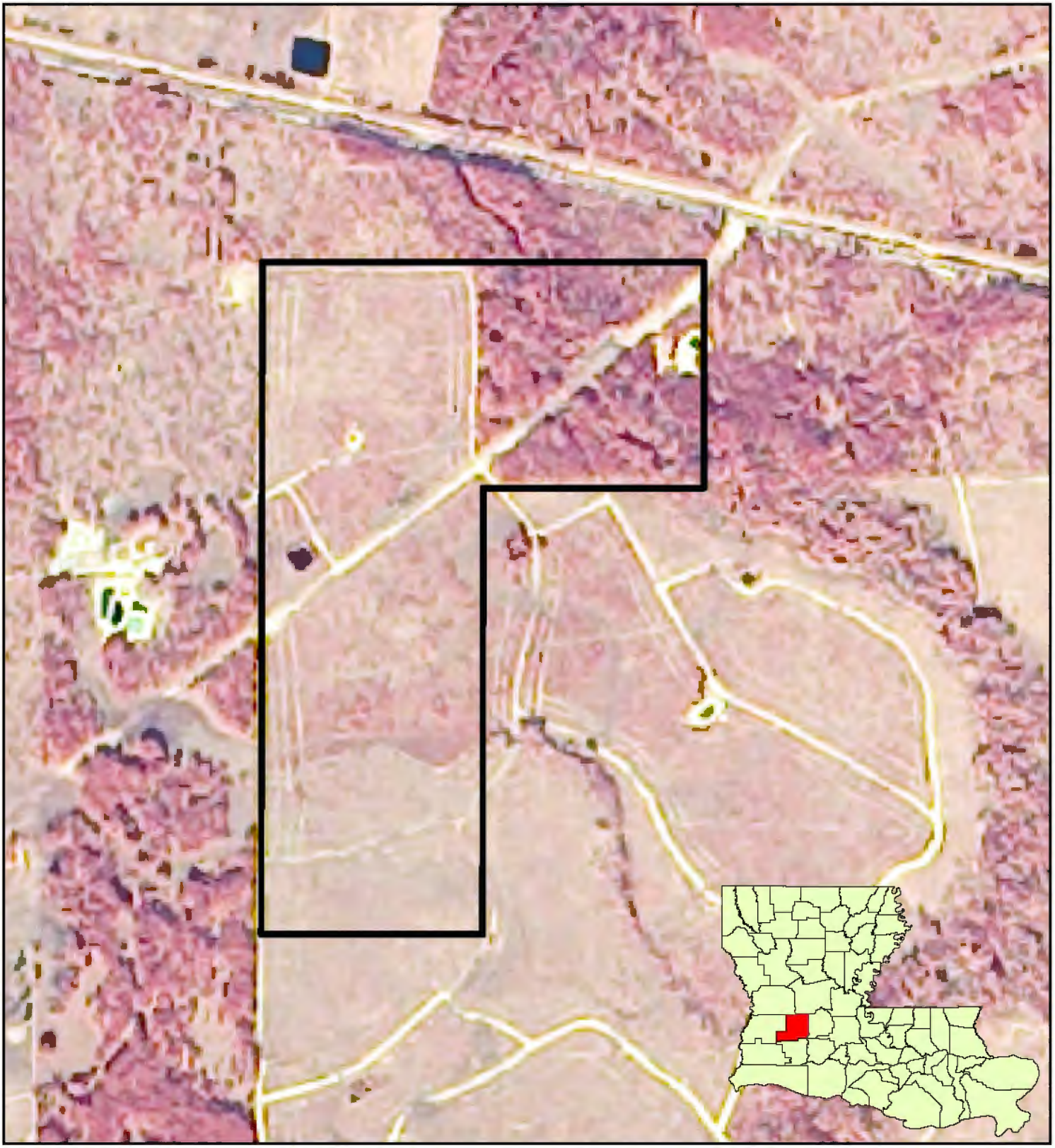
SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 12
1974 Aerial Photograph

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/11/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:



Feet
0 500 1,000 2,000

Service Layer Credits:

Approximate Site Boundary

N
W E
S

ST. GABRIEL RESOURCES LLC

SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 13
1985 Aerial Photograph

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/11/18	Project # 11732
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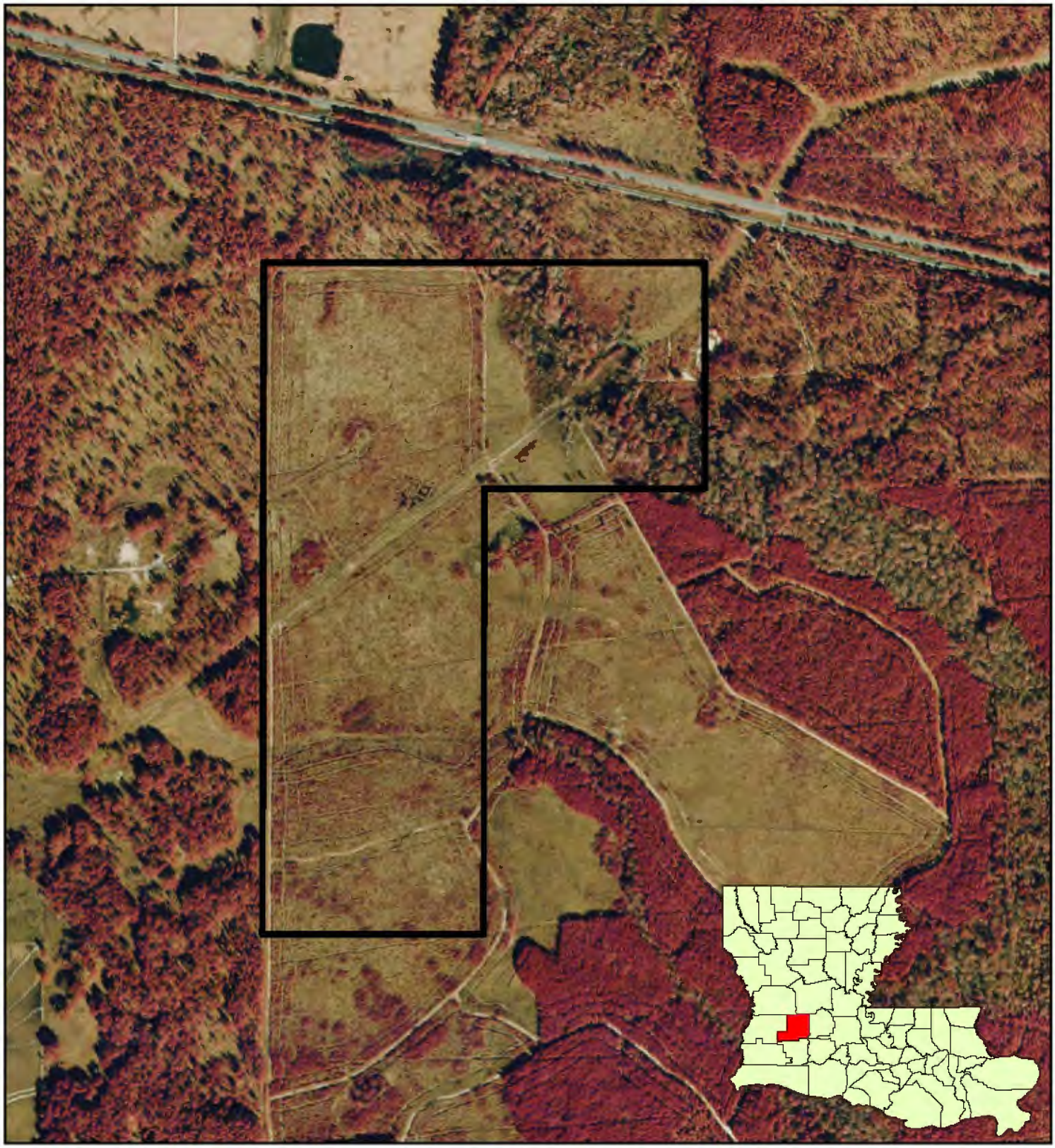


Feet
0 500 1,000 2,000

Service Layer Credits:

N
W E
S

Approximate Site Boundary

ST. GABRIEL RESOURCES LLC

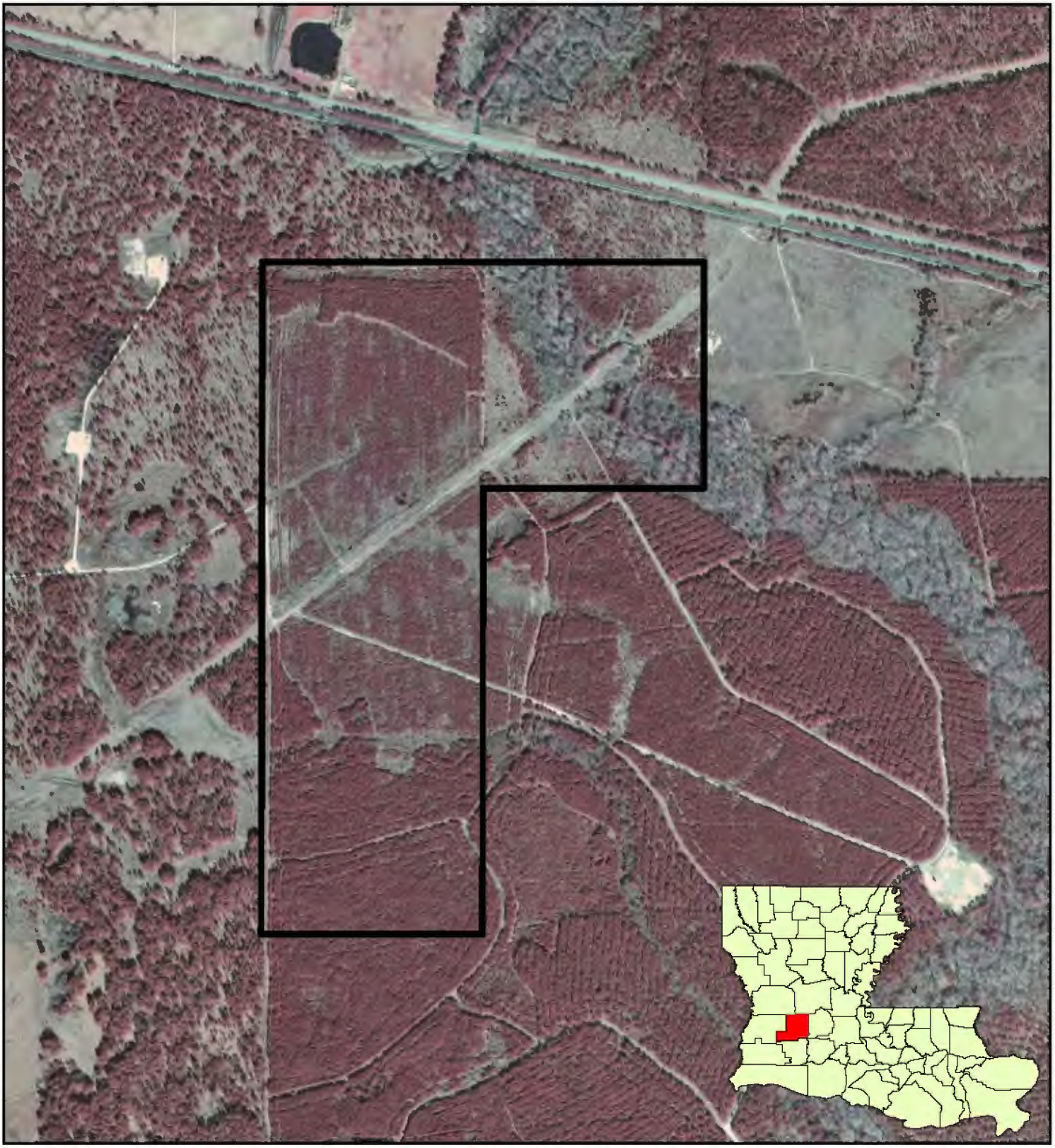
SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 14
1998 Aerial Photograph

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/11/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:



Feet
0 500 1,000 2,000

Service Layer Credits:

N
W E
S

Approximate Site Boundary

ST. GABRIEL RESOURCES LLC

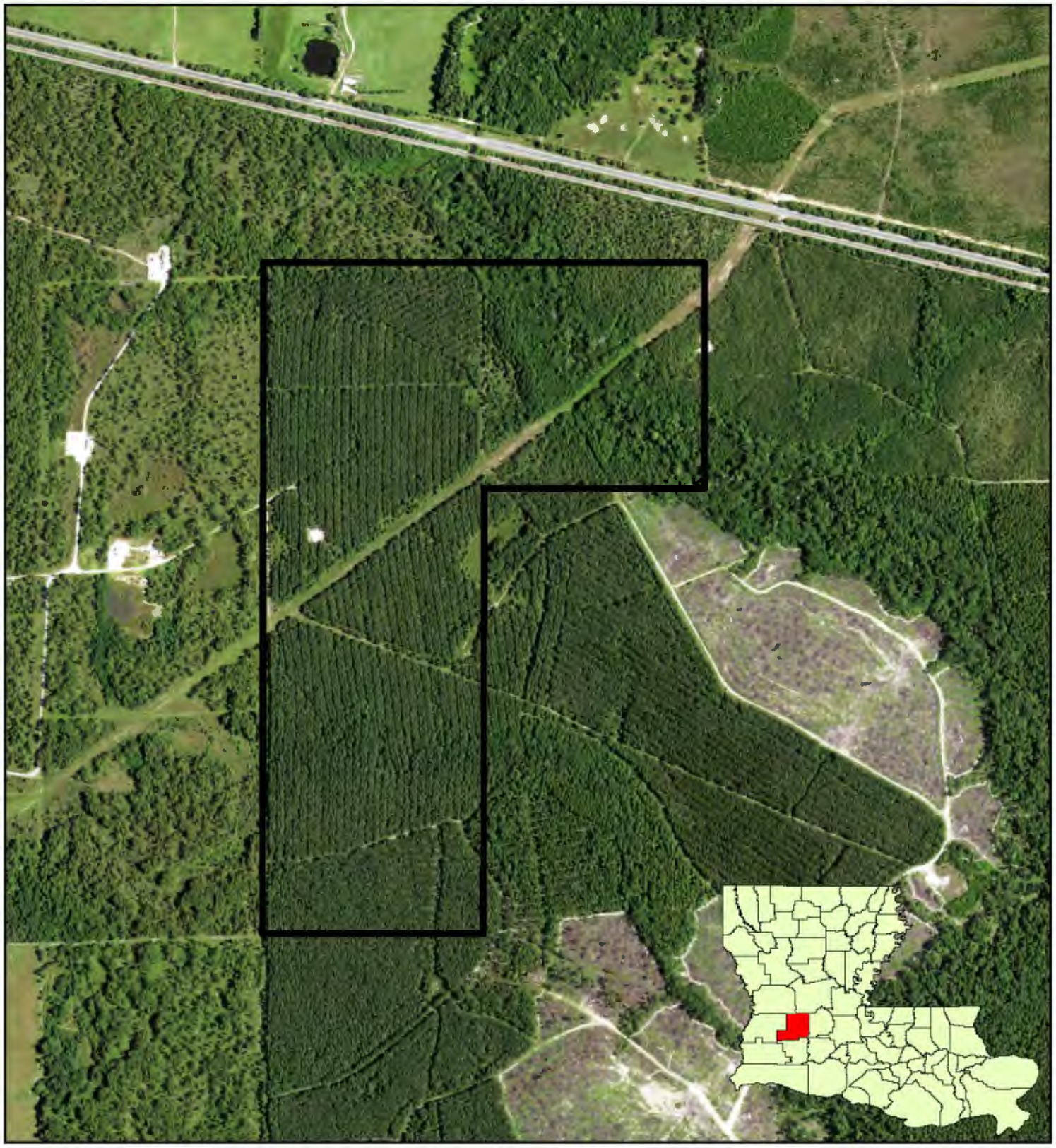
SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 15
2004 Aerial Photograph

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/11/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:



Feet
0 500 1,000 2,000

Service Layer Credits:

N
W E
S

Approximate Site Boundary

ST. GABRIEL RESOURCES LLC

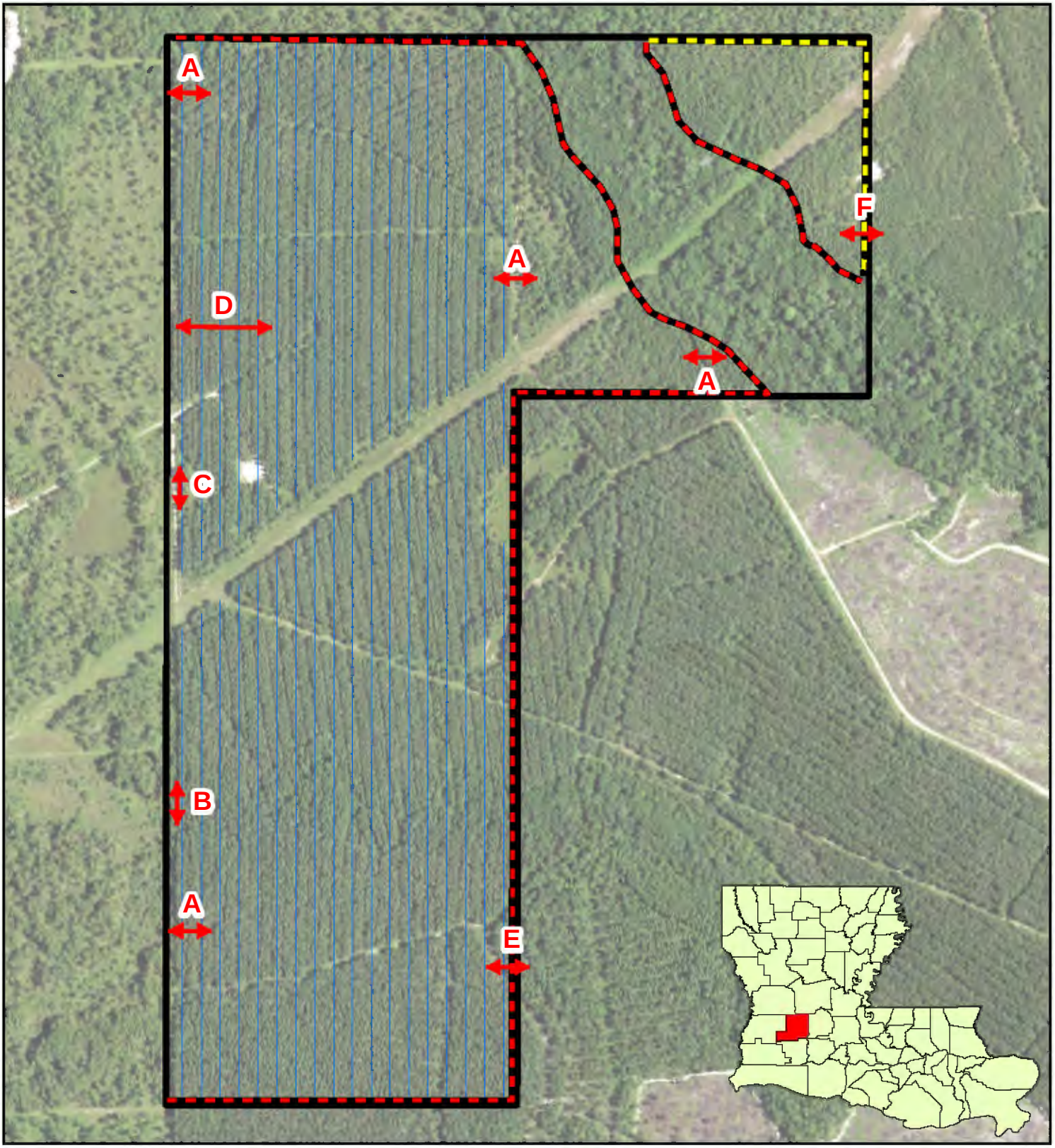
SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 16
2015 Aerial Photograph

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/11/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:



0 350 700 1,400 Feet

- Area of Bedded Pines
- Cross Section Location
- Firebreak Rehabilitation
- Firebreak Construction
- Approximate Site Boundary

N W E S

ST. GABRIEL RESOURCES LLC

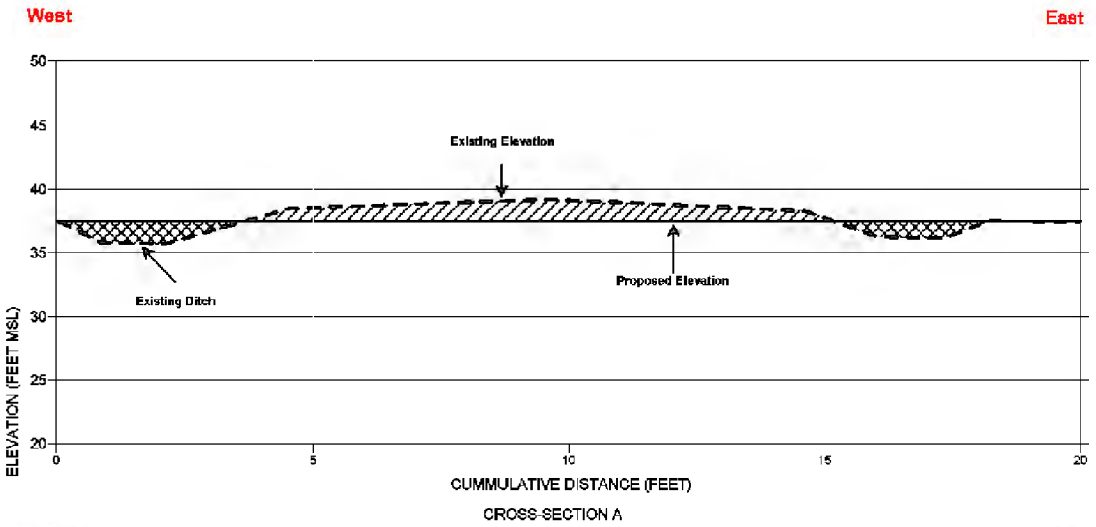
SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

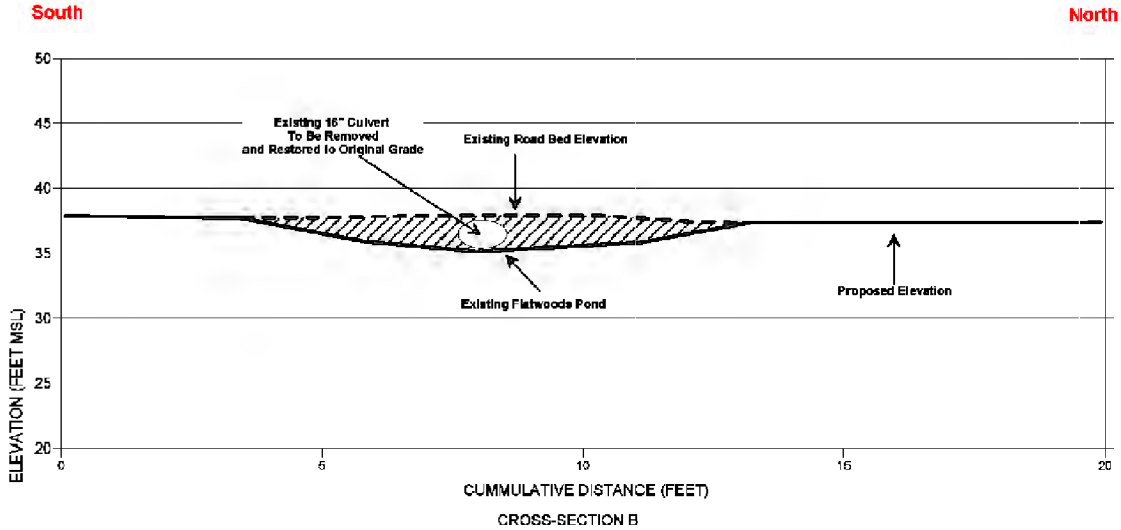
Figure 17
Cross Sectional Plan View

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

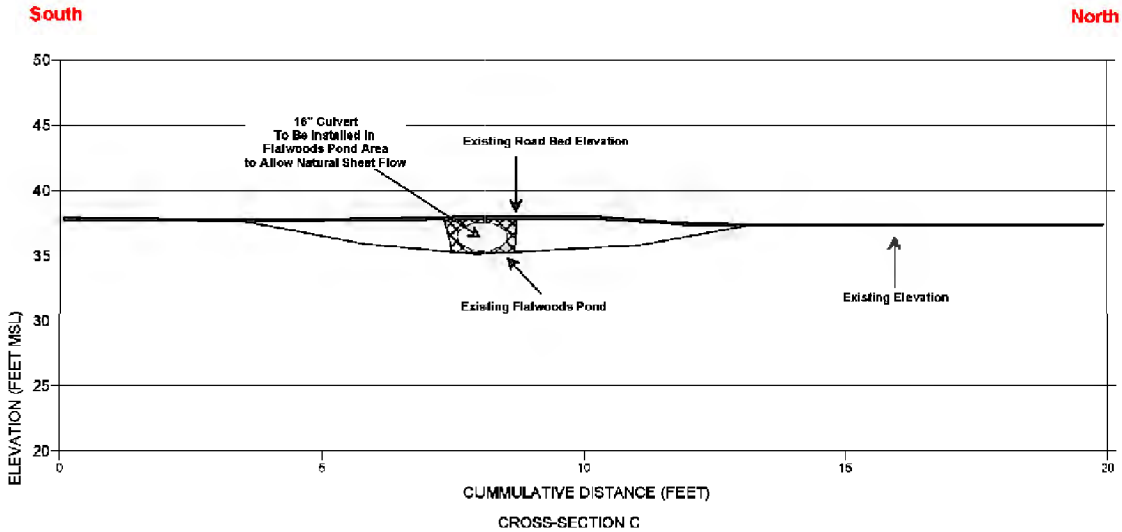
Drawn By: JRK	Date: 12/11/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:



CROSS-SECTION A



CROSS-SECTION B



CROSS-SECTION C

ST. GABRIEL RESOURCES, LLC

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 18
Cross Sections

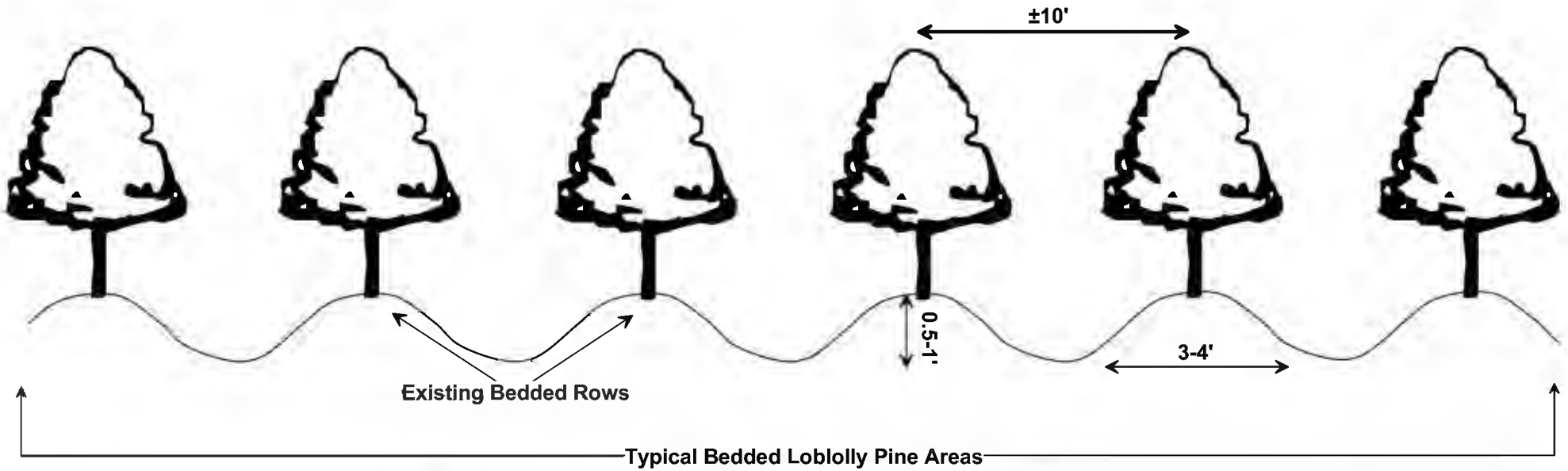
St. Gabriel Mitigation Bank
Allen Parish, Louisiana

SOUTHLAND ENVIRONMENTAL

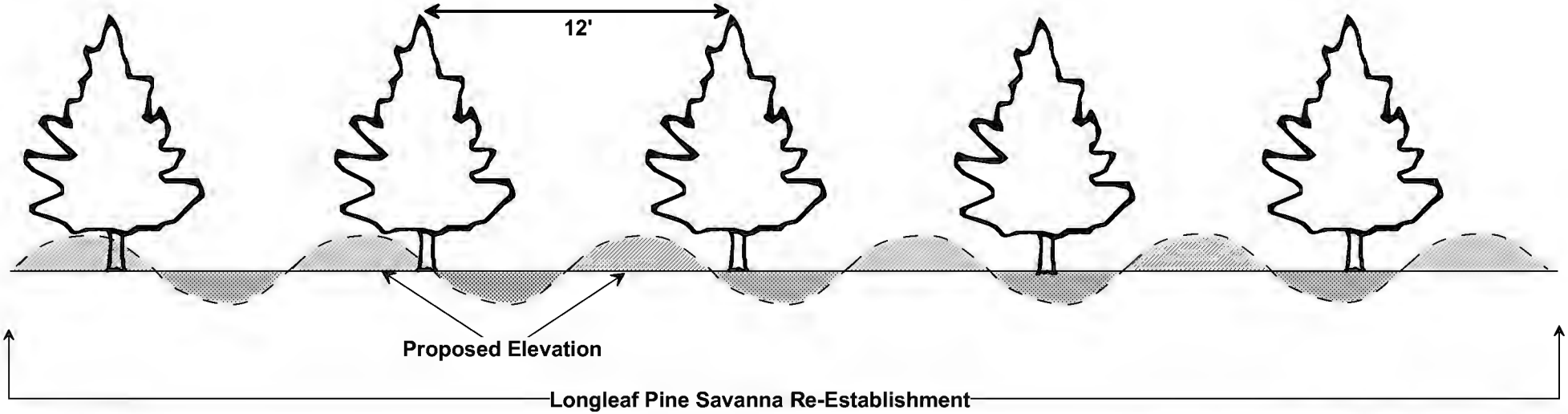
Drawn By: JRK	Date: 12/11/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:

West

East



Typical Bedded Loblolly Pine Areas



Longleaf Pine Savanna Re-Establishment

NOT TO SCALE

= Fill Areas

= Cut Areas

ST. GABRIEL RESOURCES, LLC

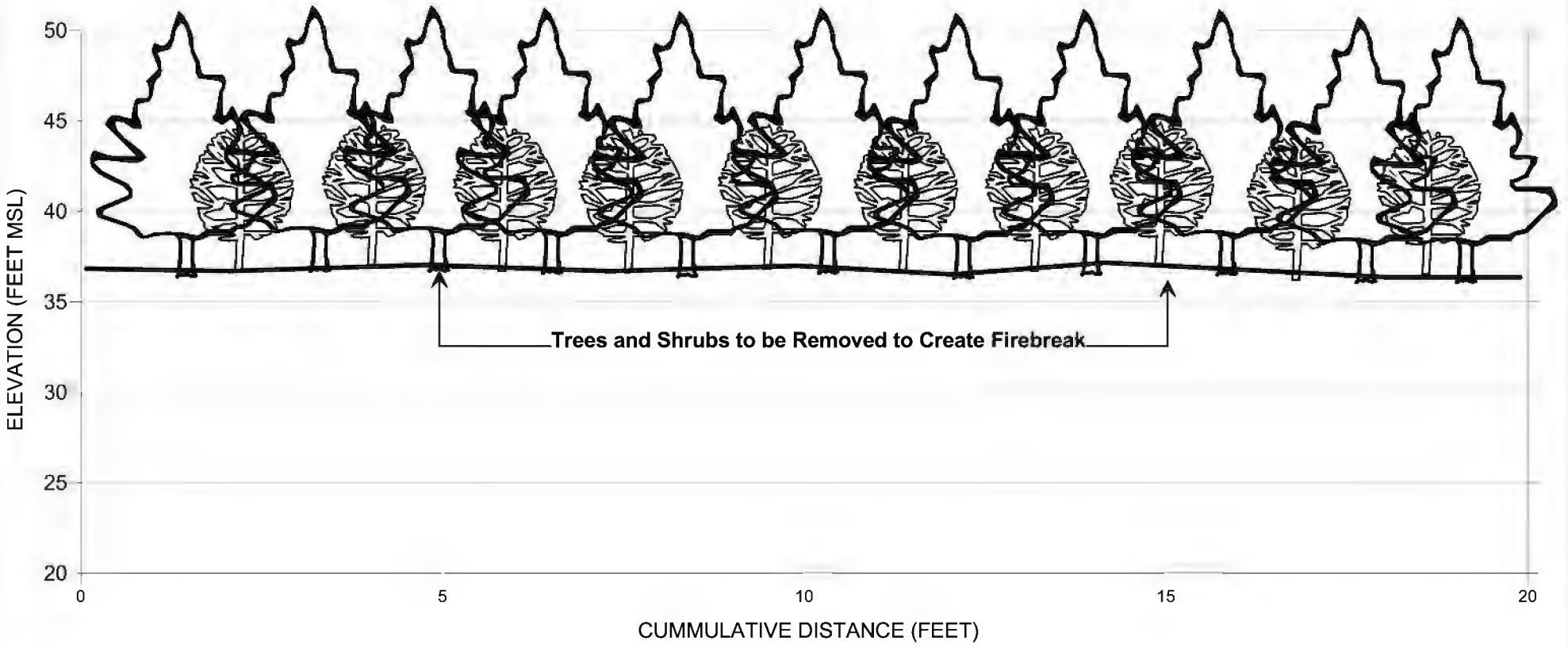
SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 19
Cross Section D

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By:	Date:	Project #:
Checked By:	Date:	Revised:



NOT TO SCALE
DIMENSIONS AS NOTED

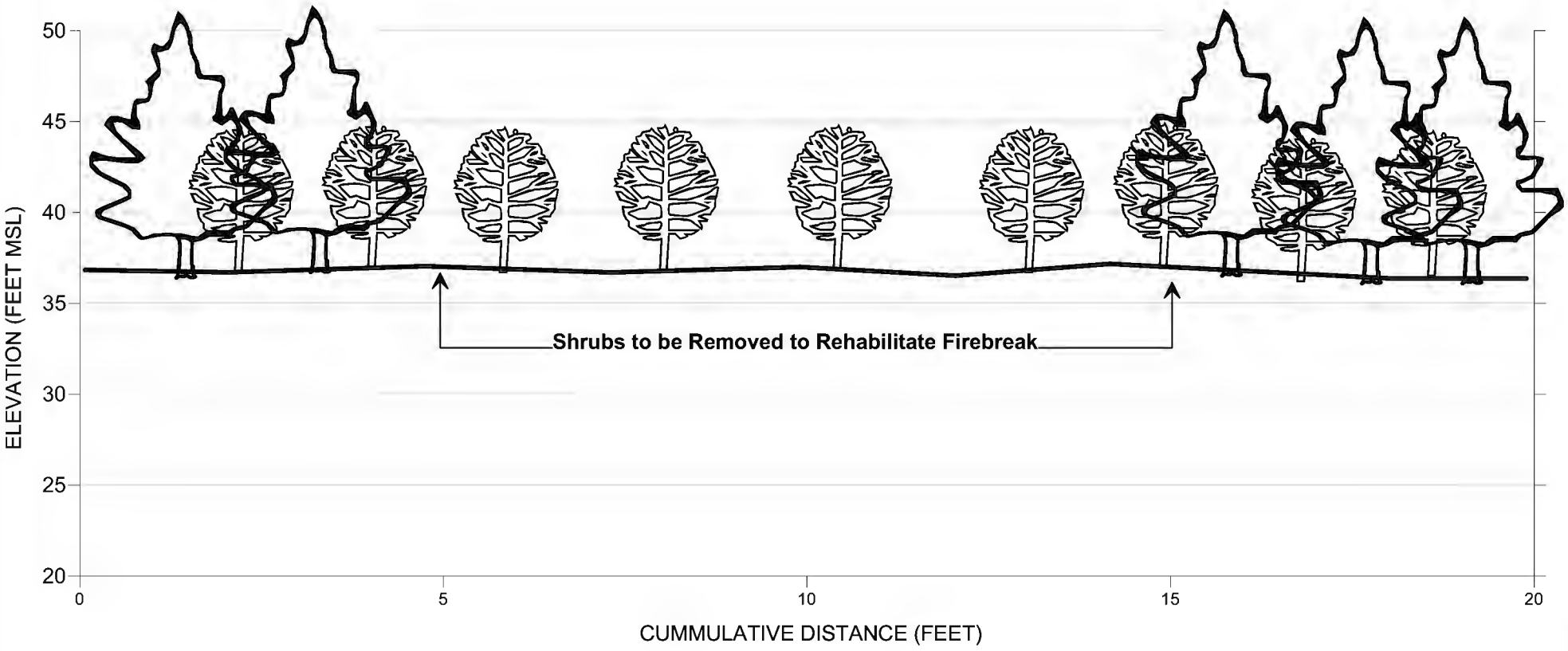
ST. GABRIEL RESOURCES, LLC

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 20
Cross Section E-Fire Break Construction

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

SOUTHLAND ENVIRONMENTAL				
	Drawn By: CRH	Date: 04/23/19	Project #: 11732
	Checked By: JRK	Date: 04/23/19	Revised:



NOT TO SCALE
DIMENSIONS AS NOTED

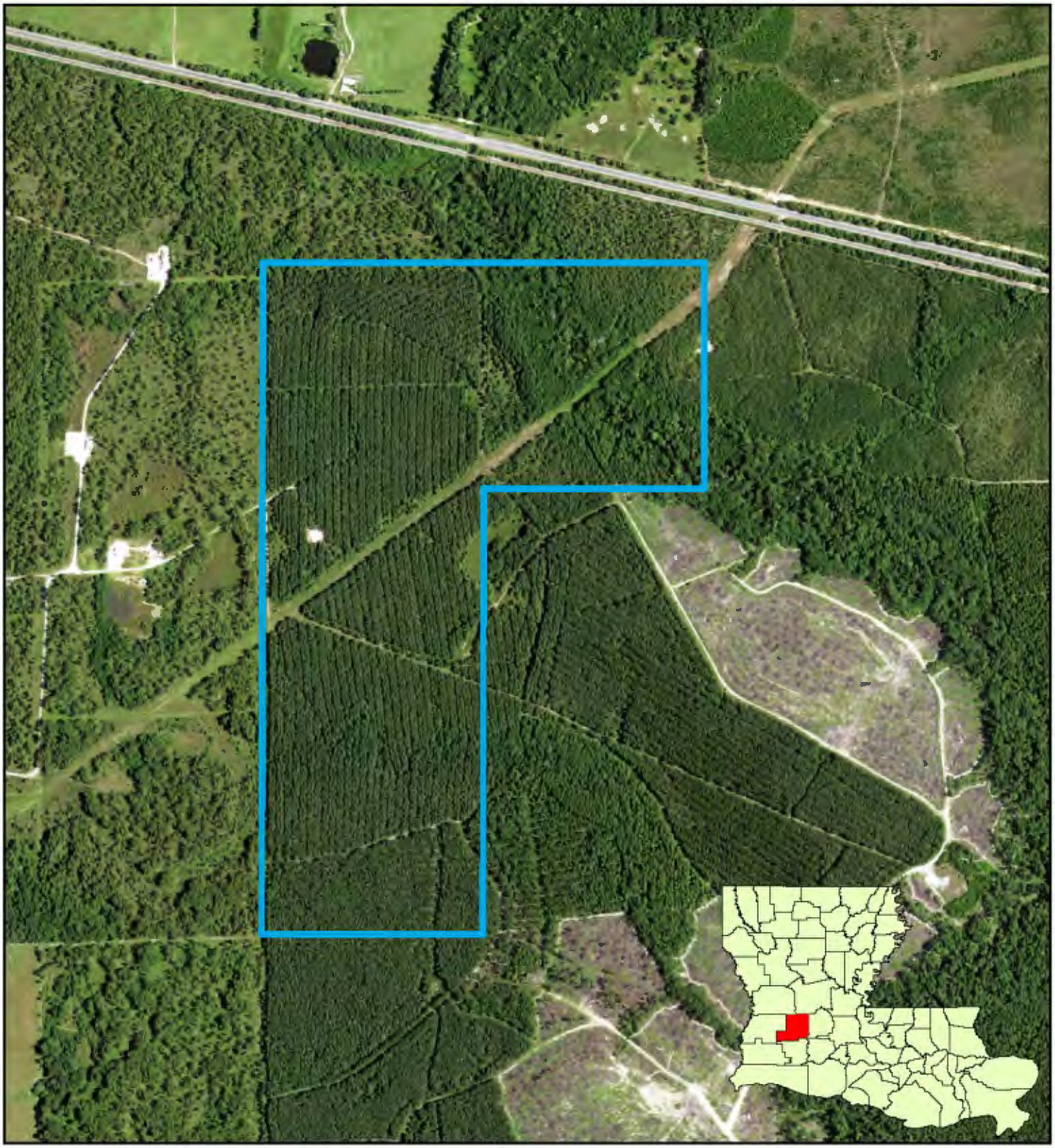
ST. GABRIEL RESOURCES, LLC

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 21
Cross Section F-Fire Break Rehabilitation

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

SOUTHLAND ENVIRONMENTAL				
	Drawn By: CRH	Date: 04/23/19	Project #: 11732
	Checked By: JRK	Date: 04/23/19	Revised:



Feet

0 500 1,000 2,000

Service Layer Credits:

N

W E

S

Conservation Servitude Boundary 165.1 Acres

ST. GABRIEL RESOURCES LLC

SOUTHLAND ENVIRONMENTAL

St. Gabriel Resources, LLC
Ragley, Louisiana

Figure 22
Conservation Servitude Map

St. Gabriel Mitigation Bank
Allen Parish, Louisiana

Drawn By: JRK	Date: 12/11/18	Project # 11732
Checked By: CRH	Date: 12/11/18	Revised:

APPENDIX A

Preliminary Jurisdiction Determination
(MVN-2016-01056-SR)

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, NEW ORLEANS DISTRICT
7400 LEAKE AVENUE
NEW ORLEANS, LOUISIANA 70118-03651

REPLY TO
ATTENTION OF

September 18, 2017

Operations Division
Surveillance and Enforcement Section

Mr. David Daigle
St. Gabriel Resources, LLC
PO Box 57
Ragley, Louisiana 770657

Dear Mr. Daigle:

Reference is made to your request for a U.S. Army Corps of Engineers' (Corps) jurisdictional determination on property located in Sections 21 and 28, Township 6 South, Range 6 West, Allen Parish, Louisiana (enclosed map). Specifically, this property is identified as the proposed site of St. Gabriel's mitigation bank just south of LA190, along Bunches Creek, between Reeves and Le Blanc.

Based on review of recent maps, aerial photography, soils data, the information provided with your request, and a field inspection of the property conducted on July 10, 2017, we have determined that part of the property contains wetlands that may subject to Corps' jurisdiction. Specifically, part of the property is 100% wetland, part of the property is 75% wetland, part of the property is 64% wetland, and part of the property is 38% wetland. The approximate limits of the wetlands are designated in red on the map. Additionally, part of the property contains uplands and is not subject to Corps' jurisdiction. The approximate limits of the uplands are designated in green on the map. Portions of the wetlands and uplands on the property are so intermingled that a detailed map cannot be completed without a survey. A Department of the Army (DA) permit under Section 404 of the Clean Water Act will be required prior to the deposition or redistribution of dredged or fill material into wetlands that are waters of the United States. Additionally, a DA permit will be required if you propose to deposit dredged or fill material into non-wetland waters subject to Corps' jurisdiction. Non-wetland waters that may be subject to Corps' jurisdiction are indicated in blue on the map.

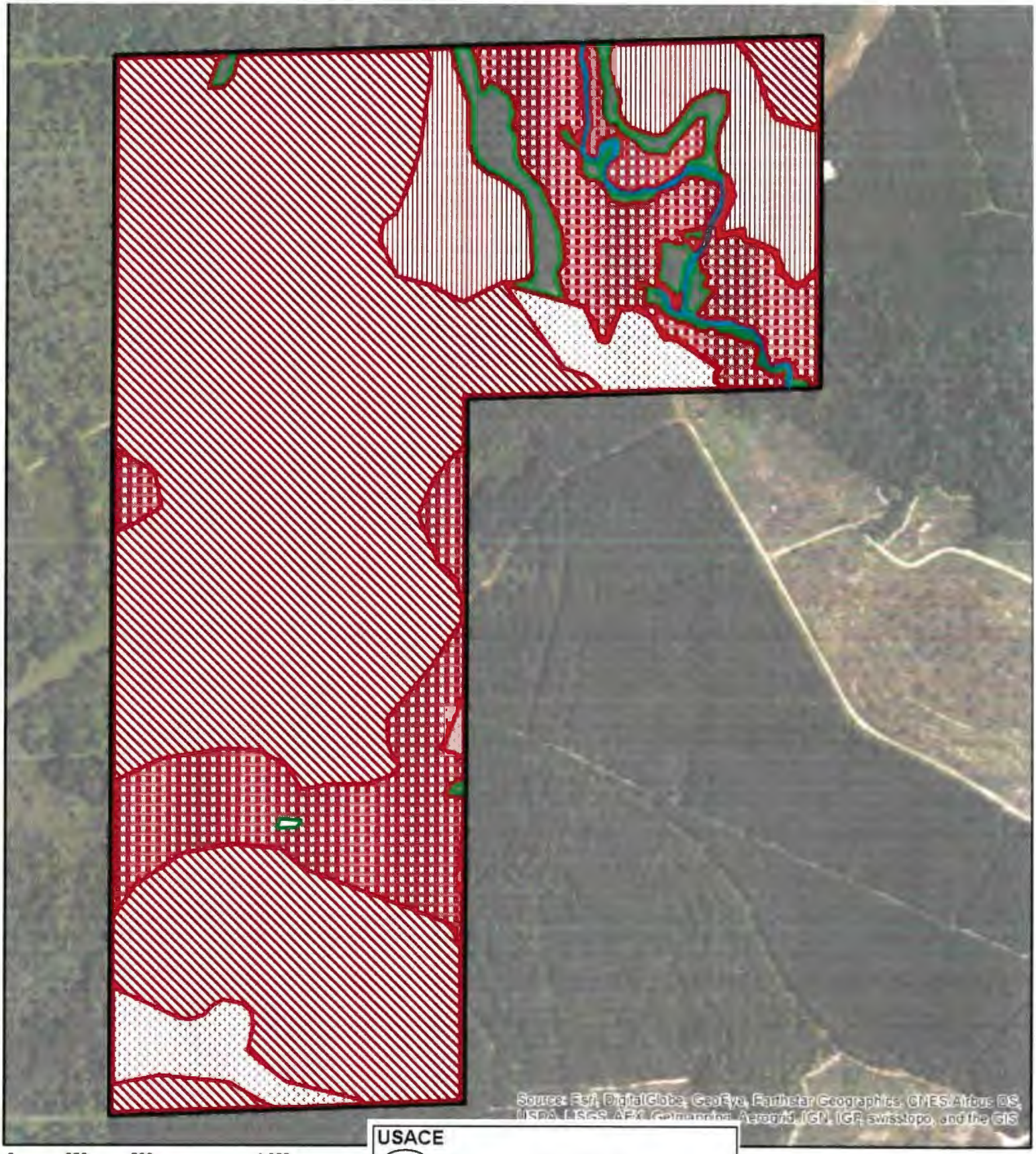
You are advised that this preliminary jurisdictional determination is valid for a period of 5 years from the date of this letter unless new information warrants revision prior to the expiration date or the District Commander has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.

Should there be any questions concerning these matters, please contact Dr. Rosie Schwamenfeld at (337) 291-3045 and reference our Account No. MVN-2016-01056-SR. If you have specific questions regarding the permit process or permit applications, please contact our Western Evaluation Section at (504) 862-2261.

Sincerely,

for Martin S. Mayer
Chief, Regulatory Branch

Enclosures



0 250 500 1,000
Feet

- REVIEW AREA
- UPLANDS
- 100% WETLANDS
- 75% WETLANDS (
- 64% WETLANDS (
- 38% WETLANDS (
- NON-WETLAND WATERS

USACE
(FSV) / IH Date: 7-10-17
Botanist: Rosie Schwamenfeld
Requestor: Dave Daigle
MVN-2016-01056-SR

PRELIMINARY
JURISDICTIONAL DETERMINATION

Revised 07/12/2017

FIGURE 2
SITE DIAGRAM
WETLAND DELINEATION
BUNCHS CREEK MITIGATION BANK
ST. GABRIEL RESOURCES LLC
ALLEN PARISH, LOUISIANA

N

PRELIMINARY JURISDICTIONAL DETERMINATION (PJD) FORM

BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR PJD: SEP 18 2017

B. NAME AND ADDRESS OF PERSON REQUESTING PJD:

David Daigle, St. Gabriel Resources, LLC
PO Box 57, Ragley, Louisiana 770657

C. DISTRICT OFFICE, FILE NAME, AND NUMBER: MVN-2016-01056-SR

D. PROJECT LOCATION(S) AND BACKGROUND INFORMATION:

(USE THE TABLE BELOW TO DOCUMENT MULTIPLE AQUATIC RESOURCES AND/OR AQUATIC RESOURCES AT DIFFERENT SITES)

State: Louisiana County/parish/borough: Allen City:

Center coordinates of site (lat/long in degree decimal format):

Lat.: 30.5085 ° Long.: -92.9850 °

Universal Transverse Mercator:

Name of nearest waterbody: Bunches Creek

E. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):

☒ Office (Desk) Determination. Date: 9-12-16, 12-23-16, 6-30-17

☒ Field Determination. Date(s): 7-10-17

TABLE OF AQUATIC RESOURCES IN REVIEW AREA WHICH "MAY BE" SUBJECT TO REGULATORY JURISDICTION.

Site number	Latitude (decimal degrees)	Longitude (decimal degrees)	Estimated amount of aquatic resource in review area (acreage and linear feet, if applicable)	Type of aquatic resource (i.e., wetland vs. non-wetland waters)	Geographic authority to which the aquatic resource "may be" subject (i.e., Section 404 or Section 10/404)
			121.93 acres	wetland	404
			2450 feet	non-wetland waters	404

SUPPORTING DATA. Data reviewed for PJD (check all that apply)

Checked items should be included in subject file. Appropriately reference sources below where indicated for all checked items:

☒ Maps, plans, plots or plat submitted by or on behalf of the PJD requestor:
Map: _____.

☒ Data sheets prepared/submitted by or on behalf of the PJD requestor.
☐ Office concurs with data sheets/delineation report.
☐ Office does not concur with data sheets/delineation report. Rationale: _____.

☐ Data sheets prepared by the Corps: _____.

☐ Corps navigable waters' study: _____.

☒ U.S. Geological Survey Hydrologic Atlas: _____.
☐ USGS NHD data.
☒ USGS 8 and 12 digit HUC maps.

☒ U.S. Geological Survey map(s). Cite scale & quad name: 1:24000 Le Blanc.

☒ Natural Resources Conservation Service Soil Survey. Citation: NRCS wss.

☒ National wetlands inventory map(s). Cite name: USFWS nwi.

☐ State/local wetland inventory map(s): _____.

☒ FEMA/FIRM maps: 1% annual flood hazard.

☐ 100-year Floodplain Elevation is: ____. (National Geodetic Vertical Datum of 1929)

☒ Photographs: ☒ Aerial (Name & Date): CIR: 98, 04, 08, 10, 13.
or ☒ Other (Name & Date): Google Earth Pro.

☒ Previous determination(s). File no. and date of response letter: 2013-02470-SC (11-6-14).

☒ Other information (please specify): lidar, previous permit: MVN-2003-00865.

IMPORTANT NOTE: The information recorded on this form has not necessarily been verified by the Corps and should not be relied upon for later jurisdictional determinations.

SCHWAMENFELD.ROSE.ELLEN.PALUMBO.1388591702 Digitally signed by SCHWAMENFELD.ROSE.ELLEN.PALUMBO.1388591702 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=SCHWAMENFELD.ROSE.ELLEN.PALUMBO.1388591702 Date: 2017.08.03 14:37:48 -05'00'

Signature and date of
Regulatory staff member
completing PJD

requested by mail dated 8-3-16

Signature and date of
person requesting PJD
(REQUIRED, unless obtaining
the signature is impracticable)[1]

[1] Districts may establish timeframes for requestor to return signed PJD forms. If the requestor does not respond within the established time frame, the district may presume concurrence and no additional follow up is necessary prior to finalizing an action.

1) The Corps of Engineers believes that there may be jurisdictional aquatic resources in the review area, and the requestor of this PJD is hereby advised of his or her option to request and obtain an approved JD (AJD) for that review area based on an informed decision after having discussed the various types of JDs and their characteristics and circumstances when they may be appropriate.

2) In any circumstance where a permit applicant obtains an individual permit, or a Nationwide General Permit (NWP) or other general permit verification requiring "pre-construction notification" (PCN), or requests verification for a non-reporting NWP or other general permit, and the permit applicant has not requested an AJD for the activity, the permit applicant is hereby made aware that: (1) the permit applicant has elected to seek a permit authorization based on a PJD, which does not make an official determination of jurisdictional aquatic resources; (2) the applicant has the option to request an AJD before accepting the terms and conditions of the permit authorization, and that basing a permit authorization on an AJD could possibly result in less compensatory mitigation being required or different special conditions; (3) the applicant has the right to request an individual permit rather than accepting the terms and conditions of the NWP or other general permit authorization; (4) the applicant can accept a permit authorization and thereby agree to comply with all the terms and conditions of that permit, including whatever mitigation requirements the Corps has determined to be necessary; (5) undertaking any activity in reliance upon the subject permit authorization without requesting an AJD constitutes the applicant's acceptance of the use of the PJD; (6) accepting a permit authorization (e.g., signing a proffered individual permit) or undertaking any activity in reliance on any form of Corps permit authorization based on a PJD constitutes agreement that all aquatic resources in the review area affected in any way by that activity will be treated as jurisdictional, and waives any challenge to such jurisdiction in any administrative or judicial compliance or enforcement action, or in any administrative appeal or in any Federal court; and (7) whether the applicant elects to use either an AJD or a PJD, the JD will be processed as soon as practicable. Further, an AJD, a proffered individual permit (and all terms and conditions contained therein), or individual permit denial can be administratively appealed pursuant to 33 C.F.R. Part 331. If, during an administrative appeal, it becomes appropriate to make an official determination whether geographic jurisdiction exists over aquatic resources in the review area, or to provide an official delineation of jurisdictional aquatic resources in the review area, the Corps will provide an AJD to accomplish that result, as soon as is practicable. This PJD finds that there *"may be"* waters of the U.S. and/or that there *"may be"* navigable waters of the U.S. on the subject review area, and identifies all aquatic features in the review area that could be affected by the proposed activity, based on the following information:

NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS AND REQUEST FOR APPEAL

Applicant: David Daigle	File Number: MVN-2016-01056-SR	Date: [illegible] 16 2017
Attached is:		See Section below
☐	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)	A
☐	PROFFERED PERMIT (Standard Permit or Letter of permission)	B
☐	PERMIT DENIAL	C
☐	APPROVED JURISDICTIONAL DETERMINATION	D
☑	PRELIMINARY JURISDICTIONAL DETERMINATION	E

SECTION I - The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits/appeals.aspx **or Corps regulations at 33 CFR Part 331.**

A: INITIAL PROFFERED PERMIT: You may accept or object to the permit.

- ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- OBJECT: If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

B: PROFFERED PERMIT: You may accept or appeal the permit

- ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- APPEAL: If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

C: PERMIT DENIAL: You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

D: APPROVED JURISDICTIONAL DETERMINATION: You may accept or appeal the approved JD or provide new information.

- ACCEPT: You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.
- APPEAL: If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

E: PRELIMINARY JURISDICTIONAL DETERMINATION: You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also you may provide new information for further consideration by the Corps to reevaluate the JD.

SECTION II - REQUEST FOR APPEAL or OBJECTIONS TO AN INITIAL PROFFERED PERMIT

REASONS FOR APPEAL OR OBJECTIONS: (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

ADDITIONAL INFORMATION: The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

POINT OF CONTACT FOR QUESTIONS OR INFORMATION:

If you have questions regarding this decision and/or the appeal process you may contact:

Brad Guarisco
Chief, Surveillance & Enforcement Section
U.S. Army Corps of Engineers
7400 Leake Avenue
New Orleans, LA 70118
504-862-2274

If you only have questions regarding the appeal process you may also contact:

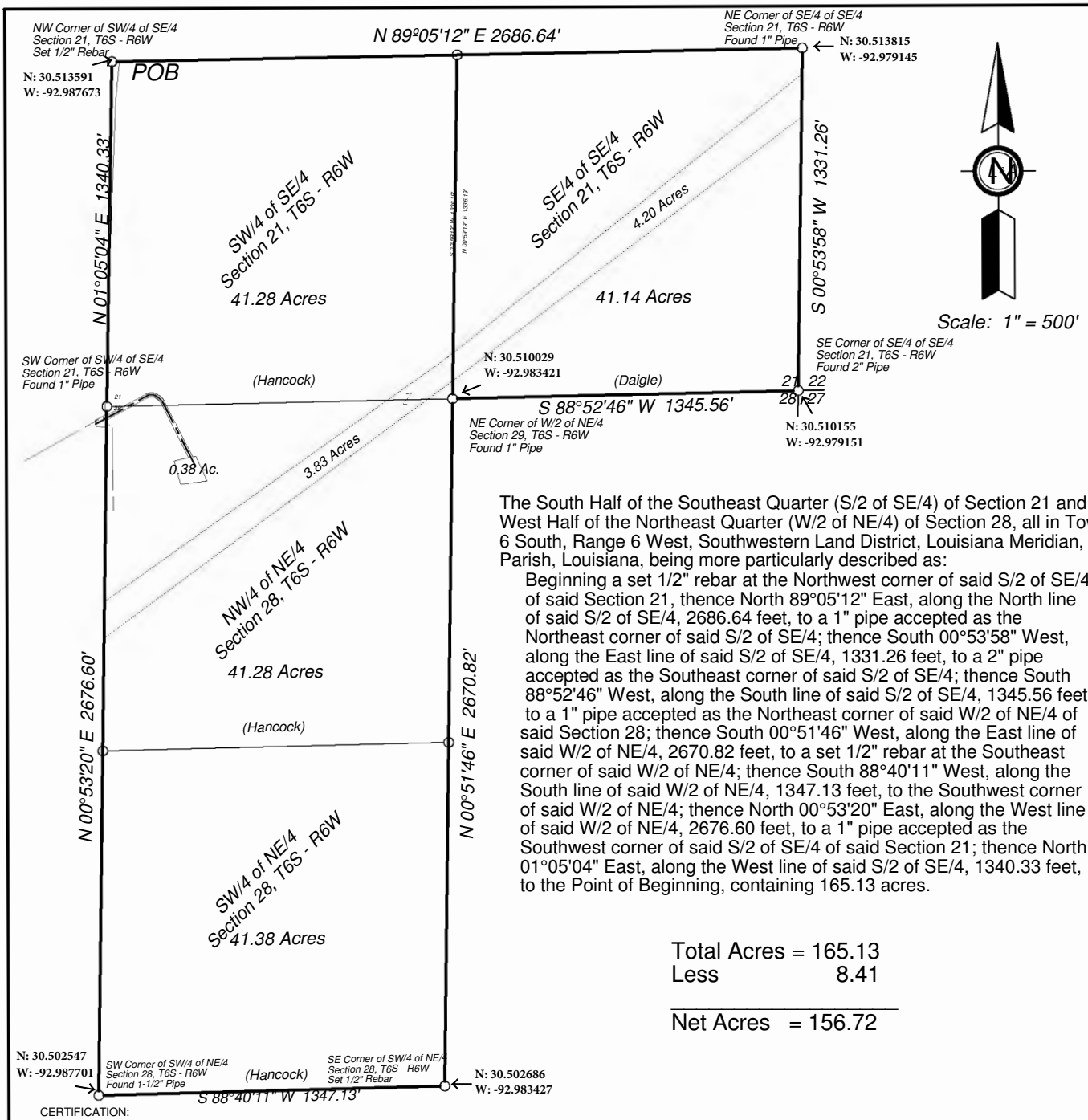
Kyle Gordon
Administrative Appeals Review Officer
Mississippi Valley Division
P.O. Box 80 (1400 Walnut Street)
Vicksburg, MS 39181-0080
601-634-5820 FAX: 601-634-5816

RIGHT OF ENTRY: Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15 day notice of any site investigation, and will have the opportunity to participate in all site investigations.

	Date:	Telephone number:
_____ Signature of appellant or agent.		

APPENDIX B

Survey Plat



The South Half of the Southeast Quarter (S/2 of SE/4) of Section 21 and the West Half of the Northeast Quarter (W/2 of NE/4) of Section 28, all in Township 6 South, Range 6 West, Southwestern Land District, Louisiana Meridian, Allen Parish, Louisiana, being more particularly described as:

Beginning a set 1/2" rebar at the Northwest corner of said S/2 of SE/4 of said Section 21, thence North 89°05'12" East, along the North line of said S/2 of SE/4, 2686.64 feet, to a 1" pipe accepted as the Northeast corner of said S/2 of SE/4; thence South 00°53'58" West, along the East line of said S/2 of SE/4, 1331.26 feet, to a 2" pipe accepted as the Southeast corner of said S/2 of SE/4; thence South 88°52'46" West, along the South line of said S/2 of SE/4, 1345.56 feet, to a 1" pipe accepted as the Northeast corner of said W/2 of NE/4 of said Section 28; thence South 00°51'46" West, along the East line of said W/2 of NE/4, 2670.82 feet, to a set 1/2" rebar at the Southeast corner of said W/2 of NE/4; thence South 88°40'11" West, along the South line of said W/2 of NE/4, 1347.13 feet, to the Southwest corner of said W/2 of NE/4; thence North 00°53'20" East, along the West line of said W/2 of NE/4, 2676.60 feet, to a 1" pipe accepted as the Southwest corner of said S/2 of SE/4 of said Section 21; thence North 01°05'04" East, along the West line of said S/2 of SE/4, 1340.33 feet, to the Point of Beginning, containing 165.13 acres.

Total Acres = 165.13
Less 8.41

Net Acres = 156.72

CERTIFICATION:

I hereby certify that this Plat of Survey is a true and accurate representation of an actual survey made in the field, under my supervision. This survey complies with the applicable Professional and Occupation Standards of Practice per Louisiana Administrative Code, Title 46, Part LXI Chapter 29, for a Class "D" survey. There are no visible encroachments existing in either direction across property lines except as shown on this plat. This property is subject to any and all servitudes, easements or rights-of-way of record or of use, which may or may not be shown on this plat.

Olin M. Lacy, Jr., P.E., P.L.S.
Louisiana Registered Surveyor No. 4585

STATE OF LOUISIANA
OLIN M. LACY, JR.
REG. No. 4585
REGISTERED
PROFESSIONAL
LAND SURVEYOR

Date: September 13, 2016

SCALE IN FEET

600 0 600 1200

Lacy & Associates, Inc.
CIVIL ENGINEER & LAND SURVEYOR
P. O. BOX 148
LONGVILLE, LOUISIANA 70652
(337) 725-6834 (337) 725-3499 FAX

SURVEY PLAT

ST. GABRIEL RESOURCES, LLC
ST. GABRIEL MITIGATION BANK
ALLEN PARISH, LOUISIANA

APPENDIX C

State Historic Preservation Office
Letter of Concurrence

148-A Easy Street, Lafayette, Louisiana 70506
PO Box 60726, Lafayette, Louisiana 70596-0726
Phone: (337) 264-9810 Fax: (337) 264-9816

July 12, 2017

Louisiana Department of Culture, Recreation & Tourism
State Historical Preservation Office
ATTN: Kristin Sanders, Deputy SHPO
P.O. Box 44274
Baton Rouge, LA 70804-44247

RE: Proposed St. Gabriel Mitigation Bank
Allen Parish, Louisiana. EDI Project No. 16-572

Dear Mrs. Sanders,

St. Gabriel Resources, LLC (St. Gabriel) intends to establish a wetland mitigation bank on approximately 165 acres in Allen Parish, Louisiana. A site location map is attached (Figure 1). Furthermore, St. Gabriel will be applying to the USACE for a permit under Section 404 of the Clean Water Act (CWA) for restoration work at the proposed mitigation site. The site is currently functioning as a monoculture loblolly pine plantation and will be restored to its historical habitat/use which was longleaf pine savannah.

The Section 404 permit will require review by the USACE and your office under Section 106 of the National Historic Preservation Act (NHPA). The coordinates for the approximate center of the site are: latitude: 30°30'32.90"N and longitude 92°59'6.60"W. St. Gabriel is proposing to clear cut the site to remove the monoculture loblolly pine plantation habitat in preparation for rehabilitation of native longleaf pine savannah. St. Gabriel is also proposing to degrade several small logging roads as part of the hydrologic restoration for the site. The existing roads were built up with dirt that was scraped from small roadside swales. Since the logging road and swale ditch areas were previously disturbed, it is our belief that degrading the roads back into the swales will not impact any previously undisturbed areas. The proposed clear cut of loblolly pine to prepare the site for longleaf pine savannah rehabilitation will be conducted in a manner that is consistent with forestry best management practices (BMP's). Therefore, it is our opinion that the establishment of the proposed mitigation bank will not impact any historic or cultural sites.

EDI respectfully requests a letter from your department as confirmation of our assessment. Please contact me at 225-252-5917 or ben.s@edienvironmental.com with any questions relative to this letter or if EDI can provide assistance in expediting this request. Thank you in advance for your timely attention in this matter.

Sincerely,
EDI Environmental Services

Ben Summerlin
Director of Ecological Services

Attached: as stated

No known historic properties will be affected by this undertaking. Therefore, our office has no objection to the implementation of this project. This effect determination could change should new information come to our attention.

Kristin P. Sanders
Deputy State Historic Preservation Officer

Date 7/21/2017

APPENDIX D

Preliminary Louisiana Rapid Assessment Method (LRAM) Calculations

LOUISIANA WETLAND RAPID ASSESSMENT METHOD (LRAM) 2.0

CEMVN Acct #

Acres Mitigation 102.7

Watershed Basin Calcasieu

Bank Name: St. Gabriel Mitigation Bank

Mitigation Factors	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8
Mitigation Type	Re-Est	Rehab	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
	6.0	5.0	0.0	0.0	0.0	0.0	0.0	0.0
Management	None	None	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Negative Influences	None	None	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Size	500 : 100	500 : 100	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Buffer / Upland	Restored	Restored	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
	0.5	0.5	0.0	0.0	0.0	0.0	0.0	0.0
Sum:	6.5	5.5	0.0	0.0	0.0	0.0	0.0	0.0
Area:	1.7	101.0						
Sum x Area Affected:	10.7	555.5	0.0	0.0	0.0	0.0	0.0	0.0

∑ Mitigation: 566.2

Mitigation Potential: 5.5

COMMENTS

Mitigation Type	1.65 Acres Pine Savanna Wetlands to be Re-Establish, 101 Acres Pine Savanna/Flatwoods Ponds Wetland to be Rehabilitated.
Management	None: No Long Term Structural Management.
Negative Influences	None: No 4-Lane highways directly adjacent to site. Interior Roads will be Degraded.
Size	165.1 Total Acres Under Conservation Servitude
Buffer/Upland	All Upland Areas to be Restored and Included Under the Conservation Servitude

LOUISIANA WETLAND RAPID ASSESSMENT METHOD (LRAM) 2.0

CEMVN Acct #					Bank Name				
Acres Mitigation	14.7				St. Gabriel Mitigation Bank				
Watershed Basin	Calcasieu								
		Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8
Mitigation Factors	Mitigation Type	Preser	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
		0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Management	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Negative Influences	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Size	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Buffer / Upland	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here	Pick Here
		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Sum:	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Area:	14.7							
	Sum x Area Affected:	5.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0

∑ Mitigation:	5.9
Mitigation Potential:	0.4

COMMENTS

Mitigation Type	14.7 Wetland Acres BLH to be Preserved.
Management	None: No Long Term Structural Management.
Negative Influences	None: No 4-Lane highways directly adjacent to site. Interior Roads will be Degraded.
Size	165.1 Total Acres Under Conservation Servitude
Buffer/Upland	All Upland Areas to be Restored and Included Under the Conservation Servitude