DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
100 WEST OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401

REPLY TO
ATTENTION OF:

JUNE 17 2015

Regulatory Division
SAS-2004-10120

Mr. Thomas Holmes
Kolomoki Farm, LLC
97 Lodge Road, Box 128
Bluffton, Georgia 39824

Dear Mr. Holmes:

I refer to your letters dated April 4, 2014 and September 17, 2014, regarding the Kolomoki Mitigation Bank, Spring Creek Area and Dry Creek Areas respectively. The bank is located along U.S. Highway 27, approximately 3 miles south of Bluffton, in Early County, Georgia (Latitude 31.4803, Longitude -84.8566). In accordance with the Final Banking Instrument for the Kolomoki Mitigation Bank, approved on May 16, 2005, you are requesting the release of 92.7 wetland and 24356.93 stream mitigation credits (15% of the mitigation credits for meeting the success criteria milestone for the 3rd year of monitoring at the Spring Creek Area) for future sale. Additionally, you are requesting the release of 36.14 wetland and 16689.14 stream mitigation credits (20% of the mitigation credits for meeting the success criteria milestone for the 7th year of monitoring at Dry Creek Area) for future sale.

Based upon the Interagency Review Team's site visit on March 11, 2014, and the submittal of your 7th annual monitoring report, we have determined that the Dry Creek area of the project has met the success criteria milestone. Therefore, we are approving the release of 36.14 wetland and 16689.14 stream mitigation credits for sale.

We have determined that there are several issues that need to be addressed prior to any additional credit release in the Spring Creek Area. Please address the following:

a. The macro-invertebrates for T3 have not improved from baseline and the Banking Instrument success criteria states "consistent improvement".

b. Superimpose stream cross sections on baseline cross sections so we can see the difference.

c. Provide raw data for the Habitat Scores and the key as to how the factors are scored.

d. Habitat scores seem high, especially for T3, considering the other data provided and the site visit.

e. Remove the scaling factor for vegetation, it's confusing and inconsistent.

Additionally, we are concerned with the growth of the vegetation on the site. The Banking Instrument states vegetation height will double in 3-5 years and only 2 of 5 monitoring plots show they have doubled as of year three.

No additional credit releases will occur for the Spring Creek area until our concerns have been adequately addressed.

A copy of this letter is being provided to the following parties: Mr. Eric Somerville, U.S. EPA Region 4, Ocean, Wetlands & Streams Protection Branch, c/o SESD (F120-6), 980 College Station Road, Athens, Georgia 30605-2720; Ms. Sandy Abbott, U.S. Fish and Wildlife Service, Georgia Ecological Services, Post Office Box 52560, Ft. Benning, Georgia 31995; and, Mr. Stephen C. Wiedl, PWS, Environmental Specialist, Wetlands Unit, Georgia Environmental Protection Division, 7 Martin Luther King, Jr. Drive, Suite 450, Atlanta, Georgia 30334.

Thank you in advance for completing our on-line Customer Survey Form located at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey. We value your comments and appreciate your taking the time to complete a survey each time you have interaction with our office.

If you have any questions, please call Mr. Terry C. Kobs, Project Manager, Coastal Branch, at 229-430-8567.

Sincerely,

William M. Rutlin
Chief, Coastal Branch