Gutierrez, Raul

From: Breaux, Brian W MVN <Brian.W.Breaux@usace.army.mil>
Sent: Thursday, February 27, 2014 2:09 PM
To: Daniel Bollich; George Guerin
Cc: Patti Holland; Gutierrez, Raul; 'Rick Hartman'; Kyle Balkum; 'Kelley Templet'
Subject: Ponderosa Ranch: as-buit/request for credit and escrow release

Follow Up Flag: Follow up
Flag Status: Completed

Daniel:

We have reviewed the 'as-built' report (and request for credit and escrow release) provided by e-mail Feb 6, 2014. The information was provided to the principal IRT members (USFWS, EPA, LDWF) associated with the Ponderosa Ranch of Pointe Coupee Mitigation Bank for their consideration. Below are comments received in response:

USFWS: I have read through the document and everything appears to progressing along well. The plot data is good, but one thing that I did note is that they couldn't ID many of the oak species. That's understandable, but I'd like to have the actual numbers of tree composition that was planted as part of the report so that we can see what was put out there.

EPA: I have reviewed the Monitoring Report and have one comment. It seems as if they planted Crataegus aestivalis, which is not native to Louisiana and was not included on the list of proposed species in the final MBI, instead of the native and approved Crataegus opaca. As such, the EPA recommends that these be removed from the site. Until then, the EPA cannot support the granting of additional credit for this bank.

Additionally, we make the following comments and/or request clarification of certain aspects of the report:

1) Sec II. Was the "equilateral distance" referenced for the subsoiling at 9-foot intervals as implied in the sentence that followed?
2) Sec IV. We note that monitoring wells and piezometers were installed for data collection. We suggest that a meeting be scheduled sometime in the next several months to discuss the overall purpose and plan of this monitoring. As you are aware, we remain concerned regarding the degree of wetland hydrologic restoration that your proposed restoration plan can effectively accomplish. Additionally, we must consider the potential consequences that evapotranspiration will have on the long-term goals of forested wetland restoration/rehabilitation; forested systems are much more efficient at removing/displacing water than pasture.
3) Figure 8: Cross-sections E-F. The term 'proposed' is used in the drawing Legend key. If the work has been performed, then this term should be removed from the Legend key.
4) Figure 9: Cross-sections G-H. The pre- and post- sections are mislabeled as Cross-Section E-F; the legend shows a colored (green) cross-hatching not applied in the cross-section, and the term 'proposed' is used in the legend key.
5) Figure 10: Cross-sections I-J. The pre- and post- sections are mislabeled as Cross-Section E-F; and the term 'proposed' is used in the legend key.
6) Figure 11: Cross-sections K-L. The term 'proposed' is used in the legend key.
7) Figure 12: Cross-sections M-M'. The cross-section should include a key in the legend to denote the fill area and be applied to the section. If the work is completed, the "Note" should be rewritten to reflect this situation and not that the work 'will be' performed at some point 'after construction'.
8) Figure 13: Cross-sections N-N'. The cross-section should include a key in the legend to denote the fill area and be applied to the section.
9) Figure 14: Cross-sections O-O'. The cross-section should include a key in the legend to denote the fill area and be applied to the section.
10) Figure 15: Cross-sections P-P'. The cross-section should include a key in the legend to denote the fill area and be applied to the section.

11) An "excavation" key should be included in the legend on all applicable cross-sections to denote the source of fill material and applied on the cross-section(s).

If you have any questions, please contact me.

Brian W. Breaux
CEMVN Regulatory Branch
Special Projects & Policy Team
(504) 862-1938
brian.w.breaux@usace.army.mil