



Douglas E. Barr
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Northwest Florida Water Management District

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June 5, 2009

Ms. Marie Huber
USACE
CESAJ-RD-PE
P.O. Box 4970
Jacksonville, FL 32232-0019

Re: Sand Hill Lakes Mitigation Bank (SAJ-2002-5061 NW-DEB) Credit Debit Request

Dear Marie Huber,

Greetings and I hope you are doing well. A total of 55.86 federal credits are currently available at the Sand Hill Lakes Mitigation Bank (SHLMB). These available credits are apportioned as Hydric Flatwoods – 23.54 credits, Mixed Forested Wetlands – 26.76 credits, and Herbaceous – 5.56 credits. The NFWWMD requests a minor modification to USACE Permit SAJ-2002-5061(NW-DEB) to debit 7.23 Mixed Forested Wetlands credits from the federal credit ledger to comply with USACE Permit SAJ-2007-3635 (IP-AWP).

Although Special Condition #4 of SAJ-2007-3635 (IP-AWP), issued 5/11/09, specifies the withdrawal of 7.6 credits from the SHLMB federal credit ledger, the wetland impacts were assessed using UMAM (Uniform Mitigation Assessment Method) by the FDOT consultant, whereas the federal credit ledger at the SHLMB was permitted using WRAP (Wetland Rapid Assessment Procedure). For debiting purposes at the SHLMB for previous permits the USACE has recognized that "1 UMAM credit = 0.9518 WRAP credit, or 1 WRAP credit = 1.0506 UMAM credits" as applied specifically to this mitigation bank. Thus 7.6 UMAM credits as referenced in SAJ-2007-3635 (IP-AWP) would be equivalent to 7.23 WRAP units, as pertains to the mitigation bank permit, SAJ-2002-5061(NW-DEB).

Also, as a confirmation of previous communications, in April we debited 1.04 Mixed Forested Wetlands credits from the federal SHLMB credit ledger to comply with USACE Permit SAJ-2008-1195 (IP-AWP). This also was based on a conversion from a UMAM impact assessment (1.09 functional units) by the FDOT consultant to a debit in WRAP credits of 1.04.

Please feel free to contact me if you have any questions, comments, or concerns about this credit debit request.

Sincerely yours,

Duncan Jay Cairns
QMS

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