How to Get Started on an ILF Program

Ruth M. Ladd, P.W.S.

Chief, Policy & Technical Support Branch

Regulatory Division

New England District







Topics

- Potential sponsor concerns related to regulatory agencies
- What works
- What helps
- What doesn't work
- IRT process







Dam removal in MA





Potential sponsor concerns related to regulatory agencies

- Problem: Enough/appropriate data to determine demand?
- Solution: Provide info on:
 - ▶ Permits Corps (and state, if available)
 - ► Area/linear feet of impacts
 - Scrub data
 - ► Location of impacts





Potential sponsor concerns related to regulatory agencies

- Problem: Conflicts with state regulations
- Solution(s):
 - ► Involve state regulatory agency(ies) early
 - ► Use ILF when state requirements are not acceptable
 - Location
 - Type e.g., cutting/excavating of healthy upland
 - Inadequate





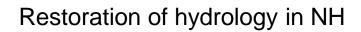
Potential sponsor concerns related to regulatory agencies

- Problem: Will there be enough funds to fulfill mitigation needs?
- Solution: Careful development of fee structure













What works

- If possible, do state-wide for consistency
- Involve Corps PM early and often
- Look at other programs
 - ► Share templates, samples
 - ▶ If feasible, attend other ILF programs' review committee/IRT meetings





What works

- Involve diverse stakeholders
 - ▶ During program development
 - ► Include two part project review in process
 - 1st Review committee
 - 2nd IRT
- Do outreach before initiation of program





What works

- Willingness/expectation to make adjustments to process (evaluation criteria, acceptable mitigation projects)
- Competitive grants process







Phragmites patch elimination in MA





What helps

- Sponsor doesn't have to be physically located in the ILF service area, but it helps
- Provide guidance documents/information on issues that arise









Preservation with stream enhancement in NH





What doesn't work

- Having sponsor staff changes in critical positions during program development
- Making service areas too small
- Trying to rely on just sponsor's experience
- Having prices too high
- Having prices too low





What doesn't work

- Having project review criteria that don't adequately/appropriate differentiate projects
- Invasives control as an enhancement/ rehabilitation project.
- Restoration with inadequate preservation, including upland buffers



What doesn't work

- Unclear expectations for long term management
- Inadequate restoration expertise in nonprofit community and in municipal entities







Stream connectivity in ME





IRT

- Involvement may be highly variable between programs
- Regular meetings or ad hoc; in person or by email?
- Do full project review or have a review committee make recommendations?





Stream, wetland, and upland preservation in NH





With special thanks to...

- New England District ILF PMs
- TNC-ME staff
- EPA Region 1 staff

...who shared their thoughts.





Contact Information

Ruth M. Ladd, PWS

New England District Corps of Engineers

Regulatory Division

696 Virginia Road

Concord, MA 01742-2751

Ruth.m.ladd@usace.army.mil

(978) 318-8818



ILF Websites

CT:

http://ct.audubon.org/conservation/conservation/in-Lieu-fee-program

ME:

http://www.nature.org/ourinitiatives/regions/northamerica/unitedstates/maine/explore/mnrcp.xml

NH:

http://des.nh.gov/organization/divisions/water/wetlands/wmp/index.htm

VT:

http://www.ducks.org/conservation/du-wetland-mitigation/in-lieu-fee-programs?poe=cms



