


**Standard Operating Procedure
Compensatory Mitigation
WETLANDS, OPENWATER & STREAMS**

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 **1. Applicability.** This Standard Operating Procedure (SOP) is applicable to regulatory actions requiring compensatory mitigation for adverse impacts to 10 acres or less of wetland or other open waters, and/or 5000 linear feet or less of intermittent and/or perennial stream (Definitions, 65 FR Vol. 47, Page 12898). This SOP may be used as a guide in determining compensatory mitigation requirements for projects with impacts greater than the above wetland and stream limits, or for enforcement actions, **however, higher than calculated credit requirements would likely be applicable to larger impacts.** In instances where it is unclear whether the jurisdictional area proposed to be impacted is a wetland, a stream, or other waters, the US Army Corps of Engineers (USACE) will make the final determination. **This SOP does not address mitigation for categories of effects other than ecological (e.g., historic, cultural, aesthetic).** Types of mitigation other than compensation (e.g., avoidance, minimization, reduction) are not addressed by this SOP. As an alternative to proposing a site specific mitigation plan, you may consider purchasing the required mitigation credits from a wetland or stream mitigation bank. For impacts in areas not serviced by approved wetland or stream banks, wetland or stream in-lieu-fee banking, as appropriate, may be proposed.

When this SOP is used in the establishment of a Mitigation Bank, the USACE will consult with the Mitigation Bank Review Team (MBRT), with the goal of achieving a consensus of the MBRT regarding the factors, elements, and design of the Mitigation Bank Plan. Once a mitigation bank receives final approval using a dated version of this SOP, that version would remain valid for that bank unless the bank is amended or substantially modified. In other words, an approved bank cannot use a later version of this SOP to possibly generate more credit, unless the Banking Instrument (BI) for the approved bank is amended for use a later version of the SOP, and this amendment of the BI is approved by the MBRT.

Also, note that this document is subject to periodic review and modification, and consultation with the local USACE office is necessary to ensure utilization of the latest approved version. However, once a project is permitted using a dated version of this SOP, that version would remain applicable to the project, unless the project is substantially modified. With regard to approved mitigation banks, the version of the SOP used to calculate credits generated by the bank would remain applicable to that bank for the purpose of re-calculating credits associated with proposed minor modifications to the bank. If a substantial modification is proposed for an approved mitigation bank, the last approved version may be required for use in re-calculating credits. Regardless of which version of the SOP might have been used to calculate credits for an approved mitigation bank, permit applicants intending to purchase mitigation bank credits are required to use the latest approved version of the SOP when calculating credit requirements. All decisions on which version of this SOP are applicable to any given situation will be made by the USACE, and are final.

2. Purpose. The intent of this SOP is to provide a basic written framework, which will provides predictability and consistency for the development, review, and approval of compensatory mitigation

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plans. A key element of this SOP is the establishment of a method for calculating mitigation credits. While this method is not intended for use as project design criteria, appropriate application of the method should minimize uncertainty in the development and approval of mitigation plans and allow expeditious review of applications. However, nothing in this SOP should be interpreted as a promise or guarantee that a project which satisfies the criteria or guidelines given herein will be assured of a permit. The District Engineer (DE) has a responsibility to consider each project on a case by case basis and may determine in any specific situation that authorization should be denied, modified, suspended, or revoked. This SOP does not obviate or modify any requirements given in the 404(b)(1) Guidelines or other applicable documents regarding avoidance, sequencing, minimization, etc. Such requirements shall be evaluated during consideration of permit applications.

3. Other Guidance.



3.1. *Mitigation Thresholds.* Projects impacting less than 0.1 acre of wetland or open water and/or less than 100 linear feet of stream will be required to provide mitigation on a case-by-case basis. Projects impacting greater than 0.1 acre of wetlands or open water and/or more than 100 linear feet of stream will usually have to at least satisfy the requirements of this SOP.



3.2. *Minimal Impacts.* Permit applicants with projects impacting more than 0.1 and less than 1.0 acres of wetland and/or more than 100 and less than 300 linear feet of stream may choose to use the following abbreviated methodology for calculating mitigation credit requirements:

- Multiply the acres of impact by 8 to arrive at the required number of wetland mitigation credits (eg, 0.5 acres of wetland impact x 8 = 4 wetland credits).
- Multiply the linear feet of stream impact by 6.5 to arrive at the required number of stream mitigation credits (eg, 100 linear feet of stream x 6.5 = 650 stream credits).

3.3. *Regulatory Guidance Letter 02-02.* On December 24, 2002, the USACE issued Regulatory Guidance Letter 02-02 (RGL 02-02). Guidance provided in RGL 02-02 is applicable to all compensatory mitigation proposals associated with permit applications submitted for approval after its date of issuance. If a discrepancy is discovered between this SOP and RGL 02-02, or any other relevant guidance, the applicant should notify the USACE of the discrepancy and request clarification before incorporating any such guidance into a proposed mitigation plan.

3.4. *National Research Council's (NRC) Mitigation Guidelines.* In its comprehensive report entitled "Compensating for Wetland Losses Under the Clean Water Act," the National Research Council (NRC) provided ten guidelines to aid in planning and implementing successful mitigation projects ("Operational Guidelines for Creating or Restoring Wetlands that are Ecologically Self-Sustaining"; NRC, 2001). Please note that these guidelines also pertain to restoration and enhancement of other aquatic resource systems, such as streams. Each of the ten guidelines can generally be described as A) basic requirement for mitigation success, or B) guide for mitigation site selection. A copy of the NRC Mitigation Guidelines is enclosed. The NRC Guidelines are referenced throughout this document.

4. Mitigation Plans. The following information will typically be required for consideration of a mitigation proposal. Proposals will be reviewed and the applicant will be advised if additional

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information will be required to make the proposal adequate for consideration. See attached Mitigation Plan Checklist for more details.

- Plans and detailed information regarding the work for which the mitigation is required.
- Drawings in accordance with the requirements given in this SOP.
- A narrative discussion of the key elements of the proposed mitigation plan.
- A narrative description of any proposed functional assessment methodology (HGM, WRAP, etc.).
- A proposed monitoring plan and a plan for documenting baseline conditions of the mitigation site.
- Names, addresses, and phone numbers for all parties responsible for mitigation and monitoring.
- A description of the existing conditions of all areas to be affected by the proposed mitigation.
- A description of the existing vegetative communities to be affected by the proposed mitigation.
- Native vegetation proposed for planting and/or allowances for natural regeneration.
- Plans for control of exotic invasive vegetation.
- Elevation(s) and slope(s) of the proposed mitigation area to ensure they conform with required elevation and hydrologic requirements, if practicable, for target plant species.
- Source of water supply and connections to existing waters and proximity to uplands.
- Stream or other open water geomorphology and features such as riffles and pools, bends, etc.
- An erosion and sedimentation control plan.
- A schedule showing earliest start and latest completion dates for all significant activities.
- A listing of measurable success factors with quantifiable criteria for determining success.
- Definitions for all success factors and other significant terms used in the plan.
- Description of the equipment, materials, and methods required for execution of the plan.
- A management plan, if necessary, for any maintenance of the mitigation.
- A contingency plan, in the event that the mitigation fails to meet success factors.
- Copy of deed to property showing owner(s) of property.
- List of all easements and right-of-ways on the property.

5. General Guidelines. Mitigation must be designed in accordance with the following guidelines.



5.1. Adverse Effects Area. The area of adverse effects as used in this document includes aquatic areas impacted by filling, excavating, flooding, draining, clearing, or other adverse ecological effects. Impacts to wetlands and other open waters will be calculated in acres and impacts to streams will be calculated in linear feet as measured along the centerline of the channel. Other categories of effects such as aesthetic, cultural, historic, health, etc., are not addressed by this document. As explained in Attachments A and C, direct effects are caused by the action and occur at the same time and place; and indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.



5.2. Mitigation Area. In general, the adverse impacts and compensatory mitigation are geographically distinct areas. The aquatic area in which the adverse effects occur will generally not be given credits as part of the compensatory mitigation area. For example, if a pond is excavated in wetlands with a resulting wetland fringe, the wetland fringe is generally not considered compensation for the excavation impacts. Similarly, an impoundment of a riverine system with a resulting increase in open surface water area or wetland fringe is not considered compensatory mitigation for the adverse impacts to the impounded riverine system. Certain exceptions may be allowed on a case-by-case basis. For example, a temporary construction impact (e.g., cofferdams, access roads, staging areas) might be mitigated by restoration or preservation of the area, depending on the nature, severity, and duration of the impacts. A compensatory mitigation area may not be given credits under more than one mitigation category nor credited more than once under any category. However, it is acceptable to subdivide a given area into sub-areas and calculate credits for each sub-area separately. For example, a restored aquatic area donated to a

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conservancy organization may be credited as either restoration or preservation, but not both. An aquatic area that contains some restoration (e.g., plugging canals in a drained wetland) and some enhancement (e.g., plugging shallow ditches in an impaired wetland) could either be subdivided into a restoration area component and an enhancement area component, or the entire area could be lumped together and given one net enhancement/restoration credit calculation. Whether or not an area is subdivided or lumped for the purpose of credit calculations is a case-by-case decision based on what is reasonable and appropriate for the given mitigation proposal. All decisions on whether a proposed mitigation action would be considered restoration, enhancement or a combination of both, will be made by the USACE, and these decisions are final.



5.3 Restrictive Covenants (RC). In most cases, mitigation sites must be perpetually protected by a Declaration of Covenants and Restrictions, whereby the owner of the property places permanent conservation restrictions on identified mitigation property. The restrictive covenant restricts development and requires that the land be managed for its conservation values. The draft model and instructions for use with the Declaration of Covenants and Restrictions is located on the USACE, Savannah District, web site located at www.sas.usace.army.mil. The web site should be viewed in order to assure that the latest version is used. Select the yellow box titled, “Permitting Info.” Under the bold paragraph titled, “Savannah District Regulatory Publications,” scroll down to find the Declaration of Covenants and Restrictions draft and instructions. The restrictive covenant is prepared by an attorney for the property owner in consultation with the environmental consultant. Property owners should make allowances for any foreseeable circumstances (e.g., utility lines, power lines, road crossings, ditch maintenance, etc.) that may conflict with recording a restrictive covenant on mitigation property. Once a property is protected by restrictive covenant, further impacts to that property are strongly discouraged by the USACE. The procedure for modifying a restrictive covenant is also located on the above web site.

5.4 Conservation Easement (CE). In addition to the restrictive covenant requirement, additional credit may be obtained by the granting of a conservation easement by the owner of the property, to a qualified third party grantee. The grantee must be a holder as defined by the Georgia Uniform Conservation Easement Act, O.C.G.A. § 44-10-1 et seq. In addition, the conservation easement is required to have certain language and meet the standards set out in the guidance. The guidance on conservation easements accepted for credit is located on the Savannah District web site under the file titled, “Conservation Easements.” The conservation easement is prepared by the attorney for the owner of the property in consultation with the grantee and reviewed by the USACE.

5.5 Government/Public Protection (GPP). In addition to the restrictive covenant requirement, extra credit may be given if the property is conveyed to and/or held or managed by a governmental/public entity and the property is further protected for its conservation and environmental functions by legislation, resolution, environmental designation or zoning for the benefit of the public and the citizens of Georgia. The governmental entity may be an agency or department of the United States charged with protection and management of the environment; a state agency or department charged with protection and management of the environment such as the Department of Natural Resources; an authority created by the legislature such as a Greenway Authority; or property held by a county and/or municipality where the property qualifies for and is listed as a Community Greenspace Program property, or is designated for use by the public as a park or greenway and is used only for passive recreational/educational purposes; and property held by an accredited university in Georgia for the stated purpose of environmental management, education and training.

5.6 Buffers. In most circumstances, wetland, open water and stream mitigation areas must include the establishment and maintenance of buffers to ensure that the overall mitigation project performs as expected. Buffers are upland or riparian areas that separate aquatic resources from developed areas and

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agricultural lands. Buffers typically consist of native plant communities (i.e., indigenous species) that reflect the local landscape and ecology. Buffers enhance or provide a variety of aquatic habitat functions including habitat for wildlife and other organisms, runoff filtration, moderation of water temperature changes, and detritus for aquatic food webs.

5.6.1 Upland Buffer. Upland buffers serve to enhance aquatic functions and increases the overall ecological functioning of wetland and open water mitigation areas. Upland buffers are necessary for wetlands or open water mitigation areas that perform important physical, chemical, or biological functions, the protection and maintenance of which is important to the region where those aquatic resources are located; and are under demonstrable threat of loss or substantial degradation from human activities that might not otherwise be avoided. Therefore, unless it can be demonstrated that an upland buffer is not necessary or practicable, wetland and openwater mitigation plans must include a minimum 25' wide upland buffer on at least 95% of the jurisdictional boundary of the mitigation area (i.e., verified wetland/upland boundary on the mitigation area). Mitigation areas will generally not be considered acceptable if they do not include a minimum 25' upland buffer. This required 25' minimum width upland buffer receives no mitigation credit. Only the area of a proposed upland buffer in excess of the minimum 25', which meets the width required at *Attachment B*, "Minimum Upland Buffer Widths for Mitigation Credit," will receive consideration for mitigation credit. Portions of buffers may be excluded from calculation of credits if they have been compromised or are of questionable protection value due to shape, condition, location, excessive width, excessive proportion of the total mitigation area, or other factors. Wetlands or other aquatic areas cannot be used as buffers on wetlands or open waters. Wetland buffer credit can be calculated using the Upland Buffer Worksheet.

5.6.2 Riparian Buffer. Riparian Buffers serve to enhance aquatic functions and increases the overall ecological functioning of stream mitigation. Riparian Buffers are necessary for streams that: 1) perform important physical, chemical, or biological functions, the protection and maintenance of which is important to the region where those aquatic resources are located; and 2) are under demonstrable threat of loss or substantial degradation from human activities that might not otherwise be avoided. Therefore, in most cases stream restoration plans must include a vegetated buffer. Riparian buffers that do not meet the appropriate minimum width requirements cannot be included in calculating credits (*Attachment D*, Riparian Enhancement and Preservation). Wetlands or other aquatic areas used to generate wetland mitigation credits cannot be used to generate stream buffer credits (i.e., multiple mitigation cannot be generated from one area).



5.7. No Net Loss. To assist in meeting the national policies of "no net loss" of wetlands and/or aquatic function, at least 50% of the wetland mitigation credits required for an authorized project must be generated from mitigation activities that result in a net gain in acres and/or aquatic function (i.e., wetland restoration, enhancement or creation), and at least 50% of the stream mitigation credits required for an authorized project must be from stream and/or riparian restoration. Wetland and stream bank credits are considered functional replacement. Conversely, no more than 50% of the wetland mitigation credits required for an authorized project can be generated from wetland preservation and/or upland buffering, and no more that 50% of the stream mitigation credits required for an authorized project can be generated from riparian buffer and/or stream preservation. In-lieu-fee bank credits are considered preservation. On a case-by-case basis, 100% of the wetland and/or stream mitigation credits required for an authorized project may be in the form of in-lieu-fee banking, but only if no commercial mitigation bank services the project area and site specific mitigation would be impractical.



5.8. Goals and Objectives. Compensatory mitigation plans should discuss environmental goals and objectives, the aquatic resource type(s), e.g., hydrogeomorphic (HGM) regional wetland subclass, Rosgen stream type, Cowardin classification, and functions that will be impacted by the authorized work, and the aquatic resource type(s) and functions proposed at the compensatory mitigation site(s). For example, for

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impacts to tidal fringe wetlands the mitigation goal may be to replace lost finfish and shellfish habitat, lost estuarine habitat, or lost water quality functions associated with tidal backwater flooding. The objective statement should describe the amount, i.e., acres, linear feet, or functional changes, of aquatic habitat that the authorized work will impact and the amount of compensatory mitigation needed to offset those impacts, by aquatic resource type.



5.9. *Site Selection* (See NRC # B 1-5). Compensatory mitigation plans should describe the factors considered during the site selection process and plan formulation including, but not limited to:

5.9.1 *Location*. Mitigation is required to be, when practicable, in areas adjacent or contiguous to the discharge site (on-site compensatory mitigation). On-site mitigation generally compensates for locally important functions, e.g., local flood control functions or unusual wildlife habitat. However, off-site mitigation may be used when there is no practicable opportunity for on-site mitigation, or when off-site mitigation provides more watershed benefit than on-site mitigation, e.g., is of greater ecological importance to the region of impact. Off-site mitigation will be in the same geographic area, i.e., in close proximity to the authorized impacts and, to the extent practicable, in the same watershed. The following factors that should be considered when choosing between on-site or off-site compensatory mitigation: likelihood for success; ecological sustainability; practicability of long-term monitoring and maintenance or operation and maintenance; and relative costs of mitigation alternatives. See NRC # A 1-4.

5.9.2. *Watershed Considerations*. Mitigation plans should describe how the site chosen for a mitigation project contributes to the specific aquatic resource needs of the impacted watershed. A compensatory mitigation project generally should be located in the same "State of Georgia Hydrologic Map Cataloging Unit (i.e., 8-Digit Unit)" as the impact site. The further removed geographically that the mitigation is, the greater is the need to demonstrate that the proposed mitigation will reasonably offset authorized impacts. For guidance on service areas for mitigation banks, see *Attachment E "Mitigation Bank Service Areas."*

5.9.3. *Practicability*. The mitigation plan should describe site selection in terms of cost, existing technology, and logistics.

5.9.4. *Air Traffic*. Compensatory mitigation projects that have the potential to attract waterfowl and other bird species that might pose a threat to aircraft will be sited consistent with the Federal Aviation Administration Advisory Circular on Hazardous Wildlife Attractants on or near Airports (AC No: 150/5200-33, 5/1/97).



5.10. *Scheduling*. In most cases, mitigation should be completed concurrent with authorized impacts to the extent practicable. Advance or concurrent mitigation can reduce temporal losses of aquatic functions and facilitate compliance. However, it is recognized that because of equipment utilization it may be necessary to perform the mitigation concurrent with the overall project. This is usually acceptable provided the time lag between the impacts and mitigation is minimized and the mitigation is completed within one growing season following commencement of the adverse impacts. In general, when impacts to aquatic resources are authorized to proceed before an approved mitigation plan can be initiated, the permittee will be required to secure the mitigation site and record a restrictive covenant.

5.11. *Maintenance*. Mitigation plans which require perpetual or long-term human intervention will usually not be acceptable. Mitigation areas should be designed to be naturally sustaining following the completion of the mitigation. Hydrology must be adequately considered since plans requiring an energy subsidy (pumping, intensive management, etc.) will normally not be acceptable. The goal is to achieve a natural state that does not depend upon maintenance. Plans with maintenance will be discouraged. See NRC # A2 and 3.

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5.12. *Pre-project Consultation.* To minimize delays and objections during the permit review process, applicants are encouraged to seek the advice of resource and regulatory agencies during the planning and design of mitigation plans. For complex mitigation projects, such consultation may improve the likelihood of mitigation success and reduce permit processing time. Furthermore, developers should typically seek advice from consultants on complicated mitigation projects.

5.13. *Lakes, Ponds, and Impoundments.* Mitigation using lakes, ponds, and impoundments may be allowed as compensation for impacts to similar waterbodies. Mitigation using lakes, ponds, or impoundments will generally not be acceptable as compensatory mitigation for adverse impacts to wetlands. Additionally mitigation using wetlands, lakes, ponds, or impoundments will generally not be acceptable as compensatory mitigation for adverse impacts to riverine systems. It is understood that open surface waterbodies provide some valuable public interest factors such as storm water storage, fisheries habitat, or ground water recharge. Therefore, in recognition of this fact, the adverse effect factors for flooding and impounding have been adjusted relative to other factors.



6. Monitoring and Contingency Plans. The applicant will normally be required to monitor the mitigation area for success and to provide written reports describing the findings of the monitoring efforts. Such reports will normally involve photographic documentation, information on survival rates of planted vegetation, and information on the monitored hydrology. Because of the many variables involved, no specific standards are set forth as a part of this policy. Instead, a monitoring plan should be submitted as a part of the mitigation proposal for review. **Monitoring efforts should usually include periodic reviews in the first year and annually thereafter (See NRC # A5).** For major mitigation projects, the plan should include contingency measures specifying remediation procedures which will be followed should the success criteria or scheduled performance criteria not be fully satisfied. Monitoring and contingency plans typically address the following items, as applicable:

- A narrative discussion of the key elements of the proposed monitoring and contingencies plan.
- Names of party(s) responsible for the monitoring and contingencies plan.
- A description of the baseline conditions (e.g., soils, hydrology, vegetation, and wildlife).
- A schedule for monitoring activities and reporting.
- A listing of measurable success factors with quantifiable criteria for determining success.
- Definitions for success factors and other terms used in the plan.
- Descriptions of equipment, materials, and methods to be used.
- Proposed protective measures (e.g., restrictive covenants or conservation easements).
- Vegetation monitoring and contingency plan.
- Hydrological monitoring and contingency plan.
- Designation of reference site.
- For stream mitigation, monitoring of physical parameters.



7. Performance Standards. **Compensatory mitigation plans will contain written performance standards for assessing whether mitigation is achieving planned goals. Performance standards will become part of individual permits as special conditions and be used for performance monitoring.** Project performance evaluations will be performed by the USACE, as specified in the permits or special conditions, based upon monitoring reports. Adaptive management activities may be required to adjust to unforeseen or changing circumstances, and responsible parties may be required to adjust mitigation projects or rectify

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deficiencies. The project performance evaluations will be used to determine whether the environmental benefits or "credit(s)" for the entire project equal or exceed the environmental impact(s) or "debit(s)" of authorized activities. Performance standards for compensatory mitigation sites will be based on quantitative or qualitative characteristics that can be practicably measured. The performance standards will be indicators that demonstrate that the mitigation is developing or has developed into the desired habitat. Performance standards will vary by geographic region and aquatic habitat type, and may be developed through interagency coordination at the regional level. Performance standards for wetlands can be derived from the criteria in the 1987 Corps of Engineers Wetlands Delineation Manual, such as the duration of soil saturation required to meet the wetland hydrology criterion, or variables and associated functional capacity indices in hydrogeomorphic assessment method regional guidebooks. Performance standards may also be based on reference sites.

8. Drawings. Mitigation plans should include drawings in conformance with the following.

a. Drawings must be provided on 8.5 x 11" paper. For larger mitigation projects, 11 x 17" or larger drawings should be submitted, in addition to 8.5 x 11" drawings. Generally, all drawings should have a scale no smaller than 1"=200'. Drawings must be clear, readable, and reproducible on standard, non-color office copiers. Each drawing sheet should include the following:

- An unused margin of no less than 1/2".
- An appropriate graphic scale (when reasonable).
- All significant dimensions clearly indicated and annotated.
- Title block with applicant's name, project title, site location, drawing date, and sheet number.
- A directional arrow indicating north.
- A clear, legible plan view indicating area sizes (e.g., square feet, acres) for all mitigation sites.

b. Location maps for the proposed activity must be included. Two maps are desired. A County road map and a US Geological Quadrangle map are preferred as sources. The location maps must show roads leading to the site and must include the name or number of these roads. The project latitude and longitude should be annotated on the maps. Each map should include a title block.

c. Plan views of the proposed mitigation must be included. These drawings must show the general and specific site location and character of all proposed activities, including the relationship of all proposed work to Waters of the United States in the vicinity of the project.

d. For ground-disturbing mitigation work, cross section views must be submitted depicting the existing ground contours and the proposed finished contours.

e. **All** aquatic areas within the project boundaries (avoided, impacted, or mitigated) must be shown.

f. Each restoration, enhancement, preservation, creation and upland buffer area must be shown.

g. A legend must be shown identifying cross-hatching, shading, or other marking techniques used.

h. A summary table with the quantity of each category of impact and mitigation must be provided.

i. Show the ordinary high water line of affected and adjacent non-tidal open surface waterbodies.

j. Show the mean high tide line and spring high tide line of affected and adjacent tidal waterbodies.

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k. For mitigation plans with more than ten acres of wetland restoration, enhancement, creation and upland buffer, or a combination thereof, certified topographic drawings showing the contours and elevations of the completed mitigation area may be required. The drawings should show types of plantings, locations of plantings, and all structures and work that are a significant part of the mitigation.

9. Mitigation Banking. Proposals to establish mitigation banks will be processed in accordance with "Guidelines on the Establishment and Operation of Wetland Mitigation Banks in Georgia." Proposals which include use of credits from a mitigation bank must normally comply with the requirements given in this SOP as well as any conditions or restrictions applicable to the bank. Guidance on the appropriate use of mitigation bank credits is contained in the document titled "Addendum 1 - Guidelines on the Establishment and Operation of Wetland Mitigation Banks in Georgia," dated January 16, 1996. This document is available on the Savannah District web site.

10. Point of Contact. Copies of this document are available at Savannah District's Regulatory Office. Questions regarding use of this policy for specific projects must be addressed to the Project Manager handling the action. Other inquiries or comments regarding this document should be addressed to:

Southern Section:

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11. Authorizing Signature. By the signature given below, this draft SOP is authorized for use.

Mirian Magwood
Chief, Regulatory Branch

ATTACHMENTS:

- A. [Wetland Mitigation Definition of Factors](#)
- B. [Wetland/Openwater Mitigation Worksheets](#)
- C. [Stream Mitigation Definition of Factors](#)
- D. [Stream Mitigation Worksheets](#)
- E. [Draft Wetland and Stream Mitigation Bank Service Areas](#)
- F. [Incorporation of the National Research Council's Mitigation Guidelines into the CWA Section 404 Program](#)
- G. [Mitigation Plan Checklist and Supplement](#)