

**Rolling Hills Generating, LLC  
OhioEPA 401 Water Quality Certification Application  
Attachment D, Conceptual Compensatory Mitigation Plan**

This compensatory mitigation described below is conceptual. After approval of the conceptual compensatory mitigation plan (Plan), final design plans will be developed for review and approval. This Plan is provided to meet OhioEPA Section 401 State Water Quality Certification requirements. The US Army Corps of Engineers has agreed to accept the requirements of this Plan, once approved by the OhioEPA, for impacts to jurisdictional waters of the US.

On site and in kind mitigation at the Rolling Hills Generating, LLC (RHG) property is proposed for permitted impacts to low quality wetlands, ephemeral streams, and intermittent streams to be permanently and temporarily impacted at the RHG property and temporarily impacted along the pipeline(s) easement route. Mitigation banks and in-lieu fee programs for mitigating wetlands and streams are not feasible for the following reasons. At the time of submittal of this Plan:

- Wetland mitigation bank credits were not available
- Similarly, stream mitigation bank credits were not available
- The in-lieu fee program for wetland and stream mitigation was not approved for this watershed.
- The project requires funding to be concurrent with construction.

Mitigation ratios for wetland resource impacts are prescribed by O.A.C. 3745-1-54. Compensatory mitigation for non-forested Category 1 and Category 2 wetlands are proposed at a 1.5:1 ratio to provide the required compensation for unavoidable impacts to the low quality wetland areas. For temporary impacts to wetlands along the pipeline(s) easement route, wetlands will be restored to pre-construction conditions at a 1:1 ratio. Additional compensatory mitigation at a 0.5:1 ratio will be completed on site at the RHG property.

Stream mitigation is proposed to provide compensation for unavoidable permanent and temporary impacts to aquatic resources at the RHG property and unavoidable temporary impacts to aquatic resources along the pipeline(s) easement route. Specifically, the stream functions of the impacted streams are expected to be replaced by the proposed reconstructed streams and protected riparian buffer areas at the RHG property.

The Plan at the RHG property consists of three ecological goals and objectives: wetland establishment/creation, reconstruction of drainage and storm water features, and Flatlick Run restoration/enhancement. Also, RHG will plant trees along the banks of the Ohio River on the landowner property where the intake structure and outfall will be located.

**Mitigated Wetland Establishment/Creation**

Approximately 0.706 acres of palustrine emergent wetland habitat will be impacted by the proposed expansion at the existing RHG facility (permanent impacts of 0.601 acres) and along the proposed pipeline(s) easement route (temporary impacts of 0.105 acres). RHG proposes to compensate for these impacts by establishing additional Category 2 wetlands on site at the RHG property at a mitigation ratio of 1.5:1 (OAC 3745-1-54), for a total of at least 0.96 acres palustrine emergent wetlands, determined by  $1.5 \times 0.601$  acres (permanent) +  $0.5 \times 0.105$  acres (temporary).

Currently, there are two palustrine emergent wetlands (Wetland 1 and Wetland 2) that were constructed on site as mitigation for wetland impacts that occurred during initial construction of the RHG facility (Nationwide Permit #12 - UN Trib Flatlick Run- 200100074). Construction of these two adjacent areas of mitigation wetlands occurred during the fall of 2004. Both wetlands are palustrine emergent wetlands totaling approximately 1.0 acre in size. Water depths in both wetlands were designed to support herbaceous and scrub-shrub habitat types. For that reason, soils within the wetlands exhibited seasonally saturated characteristics to inundation of 4-6" of water during various visits to the RHG property in 2013 and 2014. Both wetland areas contain diverse and vigorous vegetation consisting of buttonbush (*Cephalanthus occidentalis*), swamp-rose mallow (*Hibiscus moscheutos*), broadleaf cattail (*Typha latifolia*), soft rush (*Juncus effusus*), swamp rose (*Rosa palustris*), swamp chestnut oak (*Quercus michauxii*) saplings, swamp milkweed (*Asclepias incarnata*), and various species of sedges (*Carex spp.*) and rushes (*Scirpus spp.*), all hydrophytic species. Approximately 10 years after successful development, the mitigation wetlands yielded a score of 46 which identifies these wetlands as Category 2 wetlands based on the ORAM Version 5.0 functional assessment form. See photos of existing Wetland 1 and Wetland 2 in Appendix B.

RHG proposes to establish additional areas of palustrine emergent wetland habitat in the southeastern portion of the RHG property adjacent to these successful existing emergent wetland mitigation areas. Construction of additional created wetlands is expected to result in wetlands which will mimic the conditions of the existing wetland mitigation areas constructed as part of the original USACE Nationwide permit.

The conceptual wetland design for compensatory mitigation includes excavation immediately adjacent to the existing wetland mitigation areas, creating a minimum of 0.96 acres of additional emergent wetland habitat. The design base elevation of the newly created wetlands will be determined after approval of this conceptual plan, and is anticipated to be the typical growing season elevation of the water table within the existing wetland mitigation areas. The rough-grade excavation will extend vertically down to an elevation range approximately equal to the design base elevation to 12 inches below the design base elevation. The rough grade elevation of the newly created wetlands will undulate up or down within this range to provide diversity in hydrology and wetland community structure. Based on the current topographic elevation from U.S. Geological Survey (USGS) and the as-built drawings from the existing wetland mitigation areas, the calculated amount of soil to be removed could be approximately 5,000 cubic yards. This soil will either be used as suitable fill for construction at the RHG property or disposed properly off site. The rough grade excavation will be backfilled with approximately six (6) inches of topsoil segregated from onsite impacted wetlands, if possible, or other suitable topsoil to create the final design grade and appropriate growing conditions for the newly created wetlands. The newly created wetlands will have similar characteristics to those of the existing wetland mitigation areas. Hydrology for the existing wetland mitigation areas is primarily ground water and precipitation dependent, based on current knowledge of the site. See Appendix A for a Conceptual Mitigation Site Plan for the proposed newly created wetland locations.

Due to the success of the existing mitigation wetland areas, RHG proposes to use a similar planting plan when constructing the newly created wetlands. Herbaceous vegetation proposed to be planted could include sweetflag (*Acorus calamus*), swamp milkweed, arrow-arum (*Peltandra virginicum*), broad-leaf arrowhead (*Sagittaria latifolia*), soft-stem bulrush (*Schoenoplectus tabernaemontani*), green bulrush (*Scirpus atrovirens*), wool-grass (*Scirpus cyperinus*), or American bur-reed (*Sparganium americanum*). In addition, it is anticipated that the seed bank of the existing hydric soils will be relied upon to supplement the planted wetland

vegetation. Detailed planting plans of the newly created wetland will be developed after approval of this conceptual plan.

Wildlife habitat structures, such as loafing logs or nesting structures will be proposed as appropriate in the final design plan.

The newly created wetlands will be developed as Category 2 wetlands. Structure and function of the newly created wetlands will be evaluated by completing an Ohio Rapid Assessment Method (ORAM) wetland assessment for the newly created wetlands each season for a minimum of five (5) years following completion of construction. If, during this seasonal assessment, invasive species are found within the newly created wetlands, RHG will consult with the appropriate agency to control the growth of invasive species. Also, a 25-foot vegetative buffer will be maintained around the perimeter of both the existing mitigation wetland areas and the newly created wetlands.

### **Reconstruction of Streams – Stormwater Management Ditches**

Approximately 1,928 linear feet of ephemeral stream channel will be permanently impacted by the proposed expansion of the RHG facility. As described in Items 8a. and 8c. of this application, the majority of the drainage features to be permanently impacted are man-made, constructed water features which function as a part of the onsite stormwater control system installed during original construction at the site. To mitigate for permanent impacts to these drainage features, stormwater drainage features will be constructed onsite to compensate for the water quality functions consistent with the ephemeral nature of the existing man-made water features to be impacted.

The existing stormwater ditches were excavated wholly within upland soils and carry a relatively non-permanent flow of water as they were constructed for stormwater control purposes. Each ditch exhibits a stable defined bed and bank and the uplands surrounding the stormwater drainage ditches consist of maintained herbaceous vegetation that aids in stabilization of the ditches. Due to the likelihood that water is contained in the existing stormwater drainage features for a period of time, hydrophytic vegetation has developed in the stormwater ditches creating small areas of wetland habitat. See photos of existing stormwater features in Appendix B.

RHG proposes to construct stormwater drainage ditches in the western portion of the RHG property that flow into a stormwater retention/detention pond. This stormwater pond will discharge into Flatlick Run. These stormwater drainage ditches and pond will likely be constructed and used during construction (as a requirement of the construction stormwater pollution prevention plan) and then remain after construction to function as permanent stormwater management features. For this area of the RHG property, the current stormwater ditches and basins were sized for a drainage area of approximately 45 acres with a runoff coefficient of 0.41. It is anticipated that the newly created stormwater management system (ditches and pond) will accommodate a similar drainage area and runoff coefficient, as well as provide sediment and flow control of stormwater prior to discharge into Flatlick Run. A more precise drainage area and runoff coefficient determination will be completed after final design (including finalizing the grading plan) prior to construction to ensure proper sizing of the stormwater management system for both construction and permanent use.

The newly created stormwater management system will mimic the functions and features of the existing stormwater management system constructed for the original RHG generating station.

The newly created drainage ditches will be properly stabilized to prevent erosion or sedimentation into wetlands or other waters. Vegetation planted along the drainage ditches are anticipated to provide stabilization along the banks and enhanced stormwater management resulting in improved flood protection. Planted native grass mixtures proposed to be planted could include little blue stem (*Androgogan scoparium*), big blue stem (*Andropogon gerardii*), Indian grass (*Sorghastrum nutans*), switch grass (*Panicum virgatum*), annual rye (*Lolium multiflorum*), or Canada wild rye (*Elymus canadensis*).

The proposed onsite mitigation will provide stormwater attenuation, wildlife habitat, and increase the water quality of water draining to Flatlick Run via the newly created stormwater management system. Values of this system include aesthetic, water quality, flow control, and flood protection. Onsite mitigation activities will begin and be used during construction and be completed after construction is complete.

During construction of the converted RHG facility, construction of the newly created stormwater management system will proceed as follows:

- During construction, only necessary areas will be rough graded; vegetation will be maintained as much as possible
- Drainage ditch locations and pond will be determined and graded
- Ditch beds will be compacted and channels will be installed
- Erosion control structures, either temporary (such as matting, mulch, temporary seeding, silt fencing, etc.) and/or permanent (such as stone, logs, permanent seeding) will be placed on drainage ditch banks and pond
- Additional details will be provided in the construction stormwater pollution prevention plan

Following construction of the RHG facility, completion of the newly created stormwater management system will include:

- Permanent establishment of riparian vegetation (herbaceous) along drainage ditch banks and pond
- If necessary, stabilization of ditch beds
- Monitoring for stabilization and establishment of vegetation to begin the summer following the completion of the newly created stormwater management system, to be monitored for a minimum of five (5) years.

See Appendix A for a Conceptual Mitigation Site Plan for the proposed stormwater drainage ditch and stormwater pond location.

### **Flatlick Run Restoration/Enhancement**

Temporary impacts are proposed to Flatlick Run. The site expansion will avoid all permanent impacts to Flatlick Run. A culvert currently located under State Route 160 will be extended a maximum of 100 feet to the west to provide a temporary north-south access road across Flatlick Run on the RHG property. This will allow for safe equipment movement at the site without utilizing State Route 160. After construction which is expect to take up to 30 months, this culvert extension will be removed and this area of Flatlick Run will be returned to pre-construction conditions within the highway easement and will be improved west of the highway easement, further explained later in this section.

Temporary impacts to ephemeral and intermittent streams totaling 2,952 linear feet are also proposed along the pipeline(s) easement route. These streams will be returned to pre-construction conditions once the pipelines are installed. Additional mitigation for these temporary impacts will include restoration and enhancement of Flatlick Run on the RHG property.

Temporary impacts to streams along the pipeline(s) easement route will consist of trenching activities to install the water pipelines as well as construction equipment crossings of these water features. Prior to pipeline installation, minimal vegetation will be cleared, assisting in bank stabilization. Where feasible, stream bed material will be segregated. The pipeline(s) crossing along the streams will be as close to a 90 degree angle as possible, but will not exceed twice the width of the stream at the location of crossing. Where typical perpendicular construction methods may not be feasible due to the alignment of the pipeline(s) crossing relative to the stream, the pipeline(s) crossing will be bored. All in-water work will be completed expeditiously and in low flow conditions whenever feasible. It is anticipated that most equipment crossings will be above the OHWM of the stream.

Returning the stream to pre-construction conditions will begin immediately after pipeline(s) installation and stream crossing. Measures to be taken to restore and stabilize the bank include returning any stream bank (or suitable) material to its original location and slope, use of temporary materials such as matting, mulch, fabric, etc., and/or use of permanent materials such as wire reinforcements and gabion baskets. The majority of the streams to be impacted are four (4) feet or less in width and relatively shallow [less than two (2) feet in depth]. Therefore, it is anticipated that restoration of these stream banks will include returning any stream bank (or suitable) material to its original location and slope and via temporary stabilization measures. Where applicable, any segregated stream bed material will be returned to the stream bed. Temporary soil stabilization of the vegetated areas within 50 feet of the streams will be completed within two (2) days of pipeline(s) installation and permanent stabilization will be completed within seven (7) days. Temporary soil stabilization may include temporary seeding, matting, mulch, etc. Permanent soil stabilization may include seeding, sodding, tree planting, cobble, stone, rip rap, etc. Permanent soil stabilization will take into consideration the natural setting of the area, native plants, and the landowner's concerns. The permanent easement area will include scrub-shrub vegetation varieties that require minimal maintenance. The temporary construction easement areas will include vegetative varieties commiserate to the area, including trees. Agricultural areas will be restored accordingly, setting aside topsoil prior to pipeline(s) crossing for replacement after the pipeline(s) crossing is complete.

To further mitigate temporary impacts to streams along the pipeline(s) easement route, RHG proposes to restore, enhance, and expand the riparian buffer along Flatlick Run at the RHG property:

- 75 feet on each side of Flatlick Run, measured from the centerline of the stream, from the highway (State Route 160) easement west to the eastern edge of the transmission line easement; and
- 75 feet on the northern bank of Flatlick Run, measured from the center line of the stream, from the western edge of the transmission line easement to the western property boundary.
- 50 feet on the southern bank of Flatlick Run, measured from the centerline of the stream, from the western edge of the transmission line easement to 25 linear feet west of the western boundary of the newly created stormwater management pond

embankment. Therefore, the newly created stormwater management pond will not be within the 50-foot riparian buffer; and

- 75 feet on the southern bank of Flatlick Run, measured from the centerline of the stream, from 25 linear feet west of the western boundary of the newly created stormwater management pond embankment to the western property boundary.

Currently, areas within the proposed newly expanded buffer include the current riparian buffer, agricultural land, and minimally managed vegetated areas. Within the proposed newly expanded buffer, trees, grasses, and other native plants will be planted to improve the aesthetics of the area, increase wildlife habitat, and improve the immediate watershed area. Some physical restoration of the channel and bank may take place, but only restoration that does not require additional permitting.

Only native tree species will be planted within the newly expanded buffer, which could include sugar maple (*Acer saccharum*), red maple (*Acer rubrum*), sycamore (*Platanus occidentalis*), silver maple (*Acer saccharinum*), red oak (*Quercus rubra*), or American elm (*Ulmus Americana*). These trees will shade certain areas of Flatlick Run and create varying microclimates in the stream and within the newly expanded buffer. Grasses planted along the banks of Flatlick Run will hang into the water and provide nutrients and cover for fish and invertebrates. Planted native grass mixtures proposed to be planted could include little blue stem, big blue stem, Indian grass, switch grass, annual rye, or Canada wild rye. As trees and grasses mature, their roots will infiltrate the stream bank to create additional habitats and create stability of the channel.

Minimal changes to the current buffer are required. A very small number of invasive plants will be removed. The additional tree and grass plantings are not intended replace any vegetation within the current riparian buffer, but expand, enhance, and complement the current diversity of vegetation in place. Stream restoration and enhancement/expansion of these riparian habitats is expected to increase wildlife habitat, beneficially increase abundance and biodiversity of organisms specific to riparian zones, and improve the filtering role of riparian vegetation within the watershed area.

See Appendix A for a Conceptual Mitigation Site Plan for the proposed location of the newly expanded buffer along Flatlick Run and see Appendix B for photos of the existing riparian buffer along Flatlick Run.

### **Ohio River Tree Planting**

Along the Ohio River on the property where the intake structure and outfall will be located, RHG will enhance the existing shoreline tree varieties with additional tree plantings. Tree plantings will include varieties already present in the area, native trees to the Ohio River bank areas, and landowner request. Rip-rap for erosion control will only be used in areas where tree planting is not practical, such as below the OHWM. Also, efforts will be made to avoid as much tree and vegetation removal as practical during construction. Along the temporary construction easement, trees will also be planted after construction is complete.

### **PERFORMANCE STANDARDS**

Performance standards described below are conceptual only. After approval of a conceptual compensatory mitigation plan final performance standards will be developed for review and approval.

### **Mitigated Wetland Establishment/Creation**

Created wetlands will be considered successful in terms of compensatory mitigation if they are the appropriate acreage, wetland type (e.g., palustrine emergent), and category. Wetlands shall contain no more than 5% areal coverage of invasive species of concern and 10% open water which is an indication of vegetative success. The following are considered to be invasive species of concern for the purposes of evaluating this performance standard:

- Reed Canary Grass (*Phalaris arundinacea*),
- Common Reed (*Phragmites australis*),
- Narrowleaf Cattail (*Typha angustifolia*),
- Hybrid Cattail (*Typha glauca*)

The created wetland will be a minimum of 1.1 acres in size and will be a palustrine emergent wetland scoring as a Category 2 wetland or higher on the VIBI.

In addition, Vegetative Index of Biotic Integrity (VIBI) scores conducted in the 5<sup>th</sup> year of monitoring should indicate Category 2 (OAC 3745-1-50) wetland performance.

### **Reconstruction of Streams – Stormwater Management Ditches**

Stormwater management ditches will be evaluated annually for a minimum of five (5) years for stability, hydrologic regime, HHEI, and aquatic life and wildlife habitat functions. Physical parameters will be monitored to determine if the channel is exhibiting a stable form and functioning as a proper stormwater management system. RHG will repair and re-vegetate any unstable areas found during the annual review process. Hydrologic performance will be evaluated biannually by visually inspecting the entire length of the reconstructed channel. A headwaters habitat evaluation index (HHEI) will be performed each year for comparison to pre-construction HHEIs. Streams will be considered as successfully performing if classified as a stable and demonstrating a weighted average (weighted by stream length) HHEI score equal to or greater than the pre-construction weighted average HHEI score.

### **Flatlick Run Restoration/Enhancement**

Stream buffers will be monitored for vegetation success by estimating percent species survival of trees and areal coverage of herbaceous vegetation. Planted species survival will be considered successful if 80% of the tree species are surviving. Percent coverage and native species richness will be evaluated as a performance standard for areas treated with herbaceous seed mix. Details for herbaceous performance standards will be provided in the final mitigation plan.

### **Ohio River Tree Planting**

Tree planting along the Ohio River will be considered successful if 80% of the tree species are surviving. Details for performance standards will be provided in the final mitigation plan.

## **MONITORING**

Monitoring of compensatory mitigation (streams, buffers, and wetland) was originally proposed for a period of five years. It is anticipated that the proposed mitigation will be stable and self-sustaining and performing the majority of their anticipated functions within that time period. If elements of the compensatory mitigation are not performing to their expected standards at the end of the 5 year monitoring period, the Ohio EPA may extend the monitoring period for those elements of the compensatory mitigation that fail to meet performance standards. The following monitoring will occur on an annual basis during the monitoring period unless otherwise noted. If a particular element of the compensatory mitigation is deemed successful prior to the 5 year monitoring period future monitoring of that element may be eliminated.

### **Mitigated Wetland Establishment/Creation**

The created wetland will be evaluated to determine the total area that is classified as wetland utilizing the standard USACE wetland delineation methodology for hydrophytic vegetation and wetland hydrology. Hydric soils may not be evident within the created wetland within the monitoring period even if there is evidence of sufficient wetland hydrology. Areas considered to be wetland during the monitoring period will have a predominance of hydrophytic vegetation and evidence of wetland hydrology.

Sample plots located along transects will be utilized to collect vegetation data for determining the presence/absence of a predominance of wetland vegetation. Hydrology will be evaluated at an appropriate number of sample locations, including soil borings to determine depth to seasonal water table. Wetland type for the created wetland will be based on vegetation data collected from sample plots as well as the overall vegetative character of the created wetland. The Cowardin system wetland classification will be used to determine wetland type.

An ORAM form will be completed to determine the Category of the created wetland. The percent invasive species and percent open water will be estimated from data collected in vegetation sample plots as well as general observation of the created wetland.

Wetland areas will be assessed using The Vegetative Index of Biotic Integrity (VIBI). VIBI assessment will be conducted during the 3<sup>rd</sup> and 5<sup>th</sup> years of monitoring.

### **Reconstruction of Streams – Stormwater Management Ditches**

Stream channels will be monitored for physical stability to ensure they are functioning properly as a stormwater management system. At each stream station, the channel profile (estimated water surface slope), bankfull depth, bankfull width, and flood prone area width, and sinuosity will be measured. Substrates will generally be characterized by visual inspection. Pebble counts may be conducted if substrates cannot be adequately characterized visual inspection methods. These elements will be used to determine the average weighted HHEI score of compensatory stream mitigation. Prior to construction activities a similar investigation will be made for the streams that will be impacted by the project. This will provide a baseline average weighted HHEI score for impacted streams to use a baseline for comparison.

### **Flatlick Run Restoration/Enhancement**

Stream buffers will be monitored for vegetation success by estimating percent species survival for woody species and percent areal coverage and native species richness of herbaceous

species. Areal coverage will be estimated visually and native species richness will be determined by either plot or meander survey of seeded areas. Woody species survival will be estimated by determining the number of surviving stems in a minimum of 3 – 10m by 2m transects for each monitoring location.

### **Ohio River Tree Planting**

The Ohio River property will be monitored for vegetation success by estimating percent species survival for woody species. Survival will be estimated by determining the number of surviving stems in a minimum of 3 – 10m by 2m transects for each monitoring location.

### **Photographs**

During the first year of monitoring, photographic stations will be established for each monitoring point and annual photographs will be taken from these points.

### **Reporting**

An annual monitoring report will be submitted to the OhioEPA to fulfill permit conditions. The report will detail yearly performance of the mitigation site and include the following elements.

- Location: coordinates, maps, directions to the site
- Linear footage of Streams
- Wetland Classification Category
- Wetland Acreage
- Assessment Methods
- As-built drawings , plan view and cross-section in the first year (11” by 17”), updated as needed in subsequent years, with any changes due to corrective action and/or changes in dominant vegetation
- Existing Hydrology: water sources, hydroperiod, historical hydrology – if applicable, drainage area, results of water quality analysis – if applicable
- Existing Vegetation: list of species onsite, species density, general age/health of vegetation, native/non-native/invasive status, map showing plant communities
- Existing Soils: soil classification, results of soil analysis – if applicable
- Existing Wildlife Usage: presence of habitat for common and threatened/endangered species
- Historic and Current Land Use
- Current Land Owner
- Watershed Information: impairment status, description of watershed land uses, size/width of natural buffers, overall description of surrounding habitat, relative amount of aquatic resource area the mitigation site represents within the local watershed

### **ADAPTIVE MANAGEMENT**

One purpose of monitoring is to identify deficiencies and problems that affect performance or goals so that an adaptive maintenance strategy can be developed and implemented to allow attainment of compensatory mitigation requirements by the end of the monitoring period. There will be daily onsite activity of personnel and equipment during construction. Post-construction inspections will occur to identify areas of instability or lack of vegetation.

The proposed reconstructed stormwater drainage ditches are designed to mimic those that existed prior to construction impacts. If channel instability is observed during the monitoring period, the watershed will be evaluated to determine the source of instability (e.g., inadequate grade control, undersized channel, etc.). When the source of instability is identified, measures will be taken to rectify the condition (e.g., channel dimension adjustments) during the low flow period.

Vegetation success in riparian buffers will be evaluated in the fall. Barren areas will be remediated by reseeding and mulching in the spring of the following year. Tree survival will also be evaluated in the fall. If not attaining the targeted survivability, remedial tree planting will commence in spring of the following year.

Wetland vegetation will be evaluated during the fall. If it is determined that invasive species are present exceeding 5% areal coverage, then invasive species control methods will be implemented, followed by replanting with native plant species. If it is determined that there is a lack of vegetation establishing in a wetland, existing grades may be adjusted as necessary followed by replanting with native plant species.

If the desired performance is not attained by the end of the 5-year monitoring period, the applicant and the OhioEPA will agree on appropriate actions to achieve the desired performance and will reevaluate performance within 1 year of the corrective action. This may include continued enhancement and monitoring of onsite mitigation or additional mitigation.

The wetland mitigation areas and the enhanced buffer of Flatlick Run will be protected in perpetuity through a conservation easement.