ILF Project Site Plan Review Checklist Questions

The ILF Project Site Plan Review Checklist reflects the content of each element in the ILF Project Site Plan Review Workbook. For each element, the checklist asks whether the question was addressed (yes/no), whether the narrative is complete (yes/no), and the page numbers of the relevant narrative. A comment section for reviewer input is also included.

| **Review Elements**  **Questions** | **Addressed Yes/No** | **Complete (Yes/No)** | **Page #(s)** | **Reviewer Comments** |
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| **Introduction** |  |  |  |  |
| Have the ILF program prospectus and instrument been reviewed? |  |  |  |  |
| Are there any components unresolved or unaddressed from the prospectus/instrument? |  |  |  |  |
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| 1. **Project Goals and Objectives** |  |  |  |  |
| 1a. Does the project site fit within the goals and objectives of the CPF for the service area? |  |  |  |  |
| 1b. Does the project site plan include a description of the resource type(s) and approximate amount(s) that will be provided? |  |  |  |  |
| 1c. Does the project site plan identify functions and services to be provided by the project site? |  |  |  |  |
| 1d. Does the project site plan include the methods used for compensation? |  |  |  |  |
| 1e. Does the project site address ecological resource needs within the watershed or landscape setting in which the project site is located? |  |  |  |  |
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| 1. **Site Selection** |  |  |  |  |
| 2a. Is the ILF project site located within the watershed or landscape position where it is most likely to either replace lost functions and services or enhance existing, compromised functions and services as described in the approved ILF program instrument and/or CPF instrument? |  |  |  |  |
| 2b. Does the project site include areas that were formerly aquatic resources or are currently degraded aquatic resources? |  |  |  |  |
| 2c. Does the project site include buffers that would protect it from its surroundings? Does it help buffer other conserved aquatic resources from potentially incompatible activities? |  |  |  |  |
| 2d. Is the project site adjacent to other conserved aquatic resources or does it help establish, or extend a conserved corridor? |  |  |  |  |
| 2e. Has the proposed project site addressed identified ecological priorities and needs identified in the CPF for the project landscape/watershed, such as chronic environmental conditions (flooding, impaired water quality, insufficient habitat for important aquatic species, etc.) (33 CFR 332.3(c)(3)/40 CFR 230.93(c)(3))? |  |  |  |  |
| 2f. Are there any apparent potential constraints and/or limitations to the proposed project site? Are any of these critical to successful project establishment or operation? |  |  |  |  |
| 2g. Is this project site ecologically suitable for providing the desired aquatic resource functions/services within the subject watershed or landscape position? |  |  |  |  |
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| 1. **Baseline Information** |  |  |  |  |
| 3a. Does the ILF project site plan include a description of the baseline watershed/landscape, and ecological characteristics of the proposed project site? |  |  |  |  |
| 3b. Is the baseline data applicable and comparable to data that will be collected post-construction (performance standards)? |  |  |  |  |
| 3c. Do the baseline conditions support the project’s goals and objectives? |  |  |  |  |
| 3d. Does the project site plan include or reference a delineation of wetlands/waters? |  |  |  |  |
| 3e. Does the project site plan include information related to at-risk fauna and flora species and/or other regulated resources (cultural/archaeological)? |  |  |  |  |
| 3f. Does the project site plan include the location and extent of any utilities and other infrastructure in the project vicinity? |  |  |  |  |
| 3g. Does the project site plan include the location and information related to any existing easements, rights-of-way (ROWs), or other property restrictions? |  |  |  |  |
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| 1. **Mitigation Work Plan** |  |  |  |  |
| 4a. Does the project site plan include the required work plan components? Do these components have detailed specifications and descriptions? |  |  |  |  |
| 4b. Are the work plan components reflective of the project’s goals and objectives? |  |  |  |  |
| 4c. Do the work plan components follow established best practices or provide an explanation discussing why the approach is appropriate? |  |  |  |  |
| 4d. Does the work plan consider the presence of any existing infrastructure (i.e., utilities) or easements? |  |  |  |  |
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| 1. **Project Budget Review** |  |  |  |  |
| 5a. Does the IRT have an established procedure/methodology for reviewing project budgets at the project site plan stage, and if so, does the plan follow it? |  |  |  |  |
| 5b. Does the project site plan include information supporting the budget, such as a narrative or tables? |  |  |  |  |
| 5c. Does the project budget consider the potential cost/credit for the project and the extent to which the project would help the ILF program satisfy any advance credit liabilities? |  |  |  |  |
| 5d. If the projected project cost exceeds available funds, does the budget identify where the additional funds would be secured? |  |  |  |  |
| 5e. Does the budget for the project include any non-mitigation funds such as grants, donations, and/or appropriations? Does it discuss whether those non-mitigation funds will generate mitigation credit? |  |  |  |  |
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| 1. **Financial Assurances** |  |  |  |  |
| 6a. Does the project site plan include the basis for the financial assurance, either corrective action on the project site, or replacement compensation at another site? Is this consistent with district/state requirements? |  |  |  |  |
| 6b. Does the project site plan include an itemized list of work associated with construction, monitoring, and maintenance provided in support of the financial assurance estimate? Does the itemized list include all the component parts associated with the project? |  |  |  |  |
| 6c. Does the site plan include specific conditions for reduction/release of financial assurances? |  |  |  |  |
| 6d. Do the assurances identify a non-federal beneficiary in the event that a claim is made on the assurances? |  |  |  |  |
| 6e. Does the type of assurance provide for payment, performance, or both in the event that a claim is made? |  |  |  |  |
| 6f. Does the assurance include notification to the Corps at least 120 days before expiration/revocation of the assurances? |  |  |  |  |
| 6g. Does the project site plan or associated exhibit specify that the Sponsor will provide a financial assurance mechanism prior to an initial release of credits? |  |  |  |  |
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| 1. **Site Protection Instrument** |  |  |  |  |
| 7a. Does the project site plan include a proposed long-term site protection mechanism (conservation easement, declaration of restrictions, etc.)? Is the protection mechanism consistent with current district/state guidelines (including template instruments)? |  |  |  |  |
| 7b. Does the mechanism protect against interests/activities that are incompatible with the project’s goals and objectives? |  |  |  |  |
| 7c. Does the site protection instrument (or associated exhibits) list any other interests in the property (financial, mineral/timber, water rights)? Does the instrument (or exhibits/attachments to the ILF project site plan) include an explanation as to how those other interests may affect the project site? |  |  |  |  |
| 7d. If the site is located on public lands, is the Sponsor proposing additional long-term protection measures? Do they seem adequate? |  |  |  |  |
| 7e. Does the site protection mechanism include the requirement to provide the Corps with 60-days advanced notification if there is a proposed amendment or termination of the site protection mechanism? |  |  |  |  |
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| 1. **Service Area** |  |  |  |  |
| 8a. Does the project site plan or associated exhibits include a clearly defined service area(s) for the project site? |  |  |  |  |
| 8b. Are there multiple service areas or service area types defined? Is this consistent with district, state, or local requirements? |  |  |  |  |
| 8c. Does the project site plan or associated exhibits specify the watershed or landscape units used to define the service area? |  |  |  |  |
| 8d. Does the service area comply with local, district, and/or state requirements (scale, size, or resource type)? |  |  |  |  |
| 8e. Is the rationale for the location, size, and extent of the service area clearly documented in the project site plan and/or exhibits? |  |  |  |  |
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| 1. **Credit Determination** |  |  |  |  |
| 9a. Is the Sponsor’s credit determination methodology consistent with the reviewer’s district/state standards? |  |  |  |  |
| 9b. Is the proposed generation of credits consistent with district/state policy, and is it applied accurately? |  |  |  |  |
| 9c. Does the proposed number of credits reflect the difference between baseline and post-construction conditions? |  |  |  |  |
| 9d. Are any of the proposed credits based solely on preservation? |  |  |  |  |
| 9e. Are credits proposed for generation through restoration, enhancement, or preservation of riparian areas, buffers, or uplands? If so, are those riparian areas, buffers, or uplands considered necessary to maintain the ecological viability of aquatic resources? |  |  |  |  |
| 9f. Does the project site plan include a table identifying credits that will be generated by resource type and is there a corresponding map identifying those locations? |  |  |  |  |
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| 1. **Credit Release Schedule** |  |  |  |  |
| 10a. Does the project site plan or associated documents specify a credit release schedule? |  |  |  |  |
| 10b. Is the credit release schedule consistent with the mitigation type and resources being proposed? Does the project’s credit release schedule differentiate between mitigation methods and resource types? |  |  |  |  |
| 10c. Does the release schedule specify incremental milestones (e.g., construction completion, meeting performance standards) to be achieved for credit releases? |  |  |  |  |
| 10d. Will a significant amount of credits be withheld until all performance standards have been met? |  |  |  |  |
| 10e. Is the release schedule consistent with current/accepted practices in the district or state? |  |  |  |  |
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| **11. Assumption of Mitigation Responsibilities** |  |  |  |  |
| 11a. Does the project site plan include a provision stating that the Sponsor assumes the permittee’s mitigation liability? |  |  |  |  |
| 11b. Does the project site plan include a provision stating that the Sponsor will notify the district of each transaction? |  |  |  |  |
| 11c. Does the project site plan specify the timing at which the district is notified of a transaction? |  |  |  |  |
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| **12. Accounting Procedures** |  |  |  |  |
| 12a. Does the document have a credit accounting procedure outlined? |  |  |  |  |
| 12b. Does the document indicate when transaction notifications will be provided to the Corps? |  |  |  |  |
| 12c. Does it indicate what information will be provided in the notification? |  |  |  |  |
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| **13. Reporting Protocols** |  |  |  |  |
| 13a. Does the project site plan specify requirements for submittal of reports to the Corps, such as:   * + - * Project monitoring reports?       * Annual ledger account reports or RIBITS ledger updates?       * Annual financial assurance and long-term management funding reports? |  |  |  |  |
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| **14. Default and Closure Provisions** |  |  |  |  |
| 14a. Does the ILF project site plan (or associated exhibits) specify what is meant by default? |  |  |  |  |
| 14b. Does the project site plan identify options available to address default? |  |  |  |  |
| 14c. Does the project site plan (or associated exhibits) define ILF project closure and what actions must be completed in order for closure to take place? |  |  |  |  |
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| **15. Performance Standards** |  |  |  |  |
| 15a. Does the mitigation plan contain performance standards to evaluate attainment of project objectives? |  |  |  |  |
| 15b. Does the reviewer’s district have performance standards for the proposed aquatic resource(s)? If the district does not have performance standards, proceed to questions 15d-15h. If the district has performance standards, proceed to questions 15c-15h. |  |  |  |  |
| 15c. Are the standards proposed by the Sponsor consistent with current district practices? |  |  |  |  |
| 15d. Are the performance standards ecologically based (e.g., entail comparison to reference sites/data, based on functional or condition assessment methodologies, and/or have measurements of hydrology or vegetation indices)? |  |  |  |  |
| 15e. Are the standards derived from the project’s goals and objectives? Are they verifiable and well-defined? Are the standards clear enough that a third party would understand them? |  |  |  |  |
| 15f. Do the Sponsor’s standards include three elements: attribute measured, level that defines success, and time period to achieve success? |  |  |  |  |
| 15g. Do the standards evaluate incremental progress toward project objectives? |  |  |  |  |
| 15h. Do the performance standards compare project/site development to reference sites/data? |  |  |  |  |
| 15i. Where applicable, are there separate performance standards for different habitat or resource types? |  |  |  |  |
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| **16. Monitoring Requirements** |  |  |  |  |
| 16a. How long will the site be monitored? |  |  |  |  |
| 16b. What parameters/criteria will be monitored? Are they sufficiently detailed to evaluate attainment of performance standards? |  |  |  |  |
| 16c. Does the project site plan specify the content of the monitoring report? |  |  |  |  |
| 16d. Does monitoring include the use of reference sites or data to evaluate performance? |  |  |  |  |
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| **17. Maintenance Plan** |  |  |  |  |
| 17a. Does the project site plan contain a description and schedule of maintenance requirements to ensure the project remains viable once it has been constructed and throughout the monitoring period? |  |  |  |  |
| 17b. Does the description cover all relevant aspects of maintenance including ecological and infrastructure maintenance? |  |  |  |  |
| 17c. Does the description identify regular or recurring actions? |  |  |  |  |
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| **18. Adaptive Management Plan** |  |  |  |  |
| 18a. Does the project site plan or associated management plan document(s) include general guidelines for adaptive management that encompass:   * Addressing unforeseen circumstances, which may be defined at a national, state, or district level? * Coordination with IRT? * The process for adjusting the project if it cannot be constructed according to plan? * How the project will be managed if it does not meet its performance standards or long-term management goals? |  |  |  |  |
| 18b. Do the monitoring and long-term management plans include provisions to determine whether any adaptive measures are needed? |  |  |  |  |
| 18c. Do the monitoring, management, or long-term management plans consider the potential for adaptive management as a result of climate change or sea level rise? |  |  |  |  |
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| **19. Long-Term Management Plan** |  |  |  |  |
| 19a. Does the project site plan include a long-term management plan (LTMP)? |  |  |  |  |
| 19b. Does the project site plan or LTMP identify the party(ies) responsible for long-term management? Can the responsibility for long-term management be transferred to another party? |  |  |  |  |
| 19c. Does the LTMP include a complete itemization of long-term management tasks to be conducted periodically on a permanent basis? |  |  |  |  |
| 19d. Are the annual cost estimates for management activities broken down by task? Does the LTMP identify references for cost information used in the plan? |  |  |  |  |
| 19e. Does the LTMP provide information supporting how the total amount of long-term financing was determined? |  |  |  |  |
| 19f. Does the LTMP allow for periodic adjustments in management priorities? Does this include adjustments in spending? |  |  |  |  |
| 19g. Does the LTMP describe how the LTMP will be funded (lump sum, installments, prior to credit release, etc.)? Is that consistent with current practices in the district/state? |  |  |  |  |
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