Comments on the banking topics and process topics were given to Ann H in December. They will be forwarded to Kim Tapley for posting on the web site. Ann will consolidate comments and forward for posting.

Committee discussed the issue that allowing private wetland impacts to be mitigated on public lands may compete with and discourage investments in private mitigation banks.

Committee discussed the need for a mitigation bank for small impacts that result from single family home impacts and other minor approved impacts. Buying into a traditional bank could be cost prohibitive for these situations. Possible solutions such as contributions to an escrow account that could be used to purchase environmental lands were discussed. Using EPC Pollution Recovery Funds (PRF) to assist such purchases and reimbursing PRF may be an option to explore.

Committee discussed the possibility of using enhanced mitigation plans as justification for wetland impacts. Committee did not consider mitigation as justification to be appropriate.

Committee will add additional comments on these topics and those on the suggested mitigation banking and mitigation process position paper outlines. The comments will be forwarded for posting on the web site.