

PIONEER RESERVE, LLC

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Pioneer Reserve Umbrella Mitigation Banking Instrument Service Area Expansion Request

The Alaska district issued guidance (SPN 2013-599) on November 15, 2013, pertaining to standardization of geographic service area determination for mitigation banks and in-lieu fee programs operating in the District. In order to conform to this guidance, the Sponsor of the Pioneer Reserve Umbrella Mitigation Banking Instrument (Pioneer) requests service area expansion for the two bank parcels that are currently approved under the umbrella instrument: Seldon Reserve and Edgerton Reserve.

We request that our primary service area for both banks be expanded to the 8-digit HUC (hydrologic unit code) that they both lie within, 19020505, the Lower Susitna River sub-basin and the secondary service area be expanded to the 6-digit HUC that they both lie within, 190205, the Susitna River basin. Due to ecological similarity identified by Omernik et al. (2004), we also respectfully request inclusion of the areas designated as "Cook Inlet" Level III ecoregions within the 6-digit HUCs adjacent to 190205; excluding those portions within the Municipality of Anchorage and the Kenai Peninsula Borough (Figure 1).

SPN 2013-599 states that "It is the Corps' intent to apply a watershed approach to approval of new mitigation bank and in-lieu fee sites immediately." In keeping with the spirit of this statement, we respectfully request that the USACE approve this expansion request expeditiously.

Please contact me with any questions,

Thank you,

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Pioneer Reserve, Sponsor

