

Lummi Nation Wetland and Habitat Mitigation Bank



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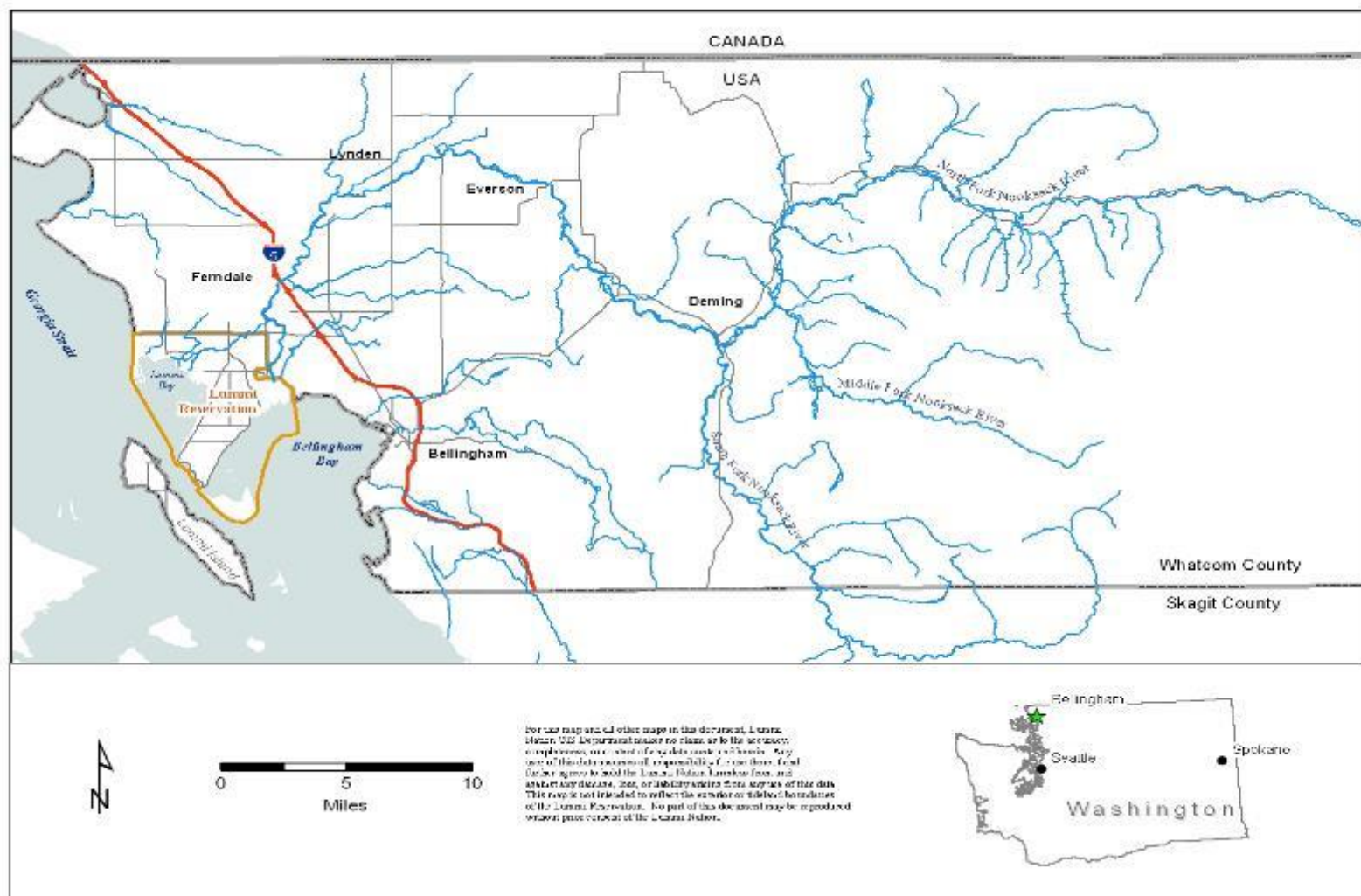


Purpose Statement

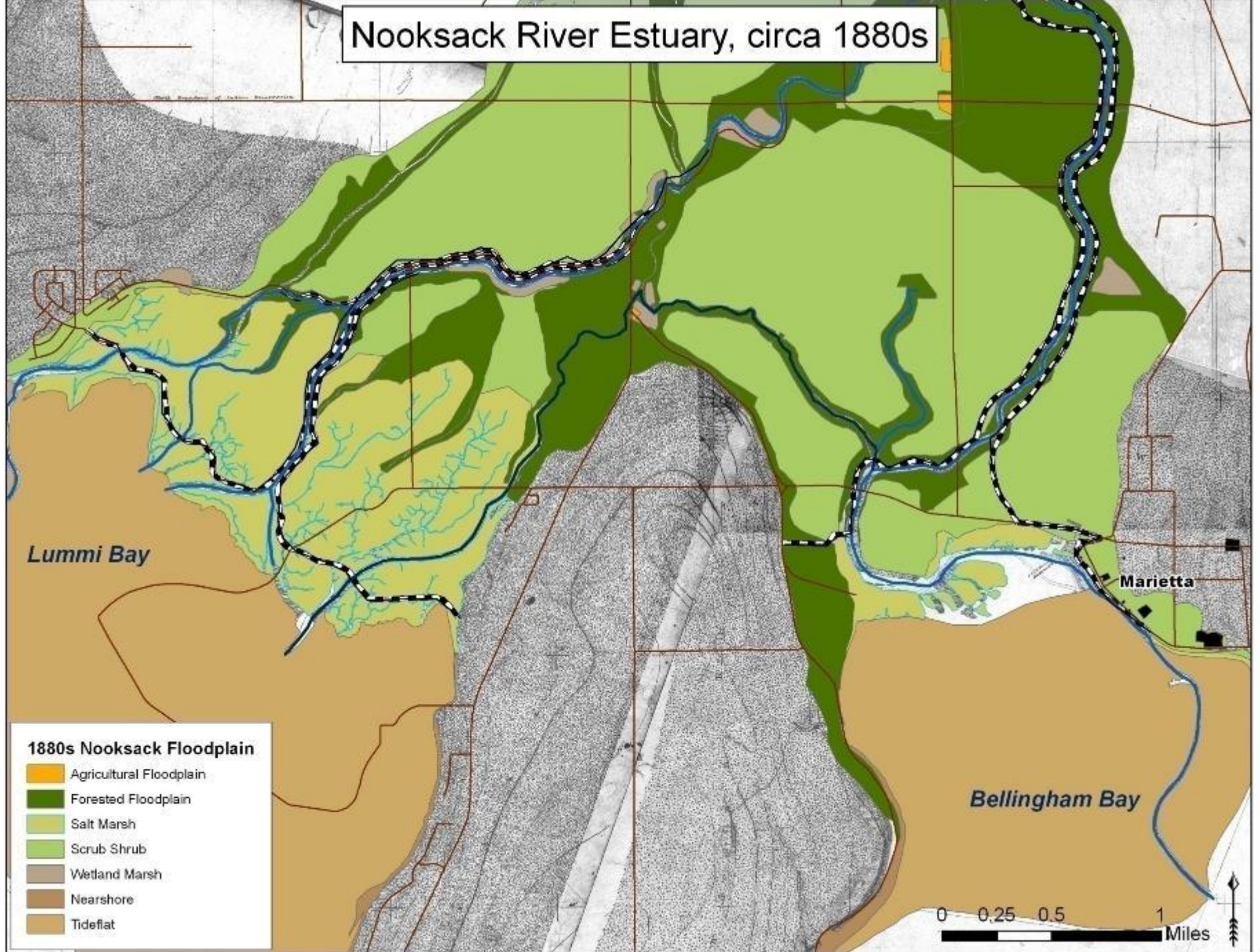
- The purpose of this presentation is to:
 - Describe **why** the Lummi government decided to develop the Lummi Nation Wetland and Habitat Mitigation Bank;
 - Describe **where** the mitigation bank is located and **what** is being done to generate mitigation credits;
 - Identify **when** the Lummi Nation Wetland and Habitat Mitigation became operational; and
 - Describe **who** is involved in the management of the mitigation bank and **how** the mitigation bank is administered.



Lummi Indian Reservation



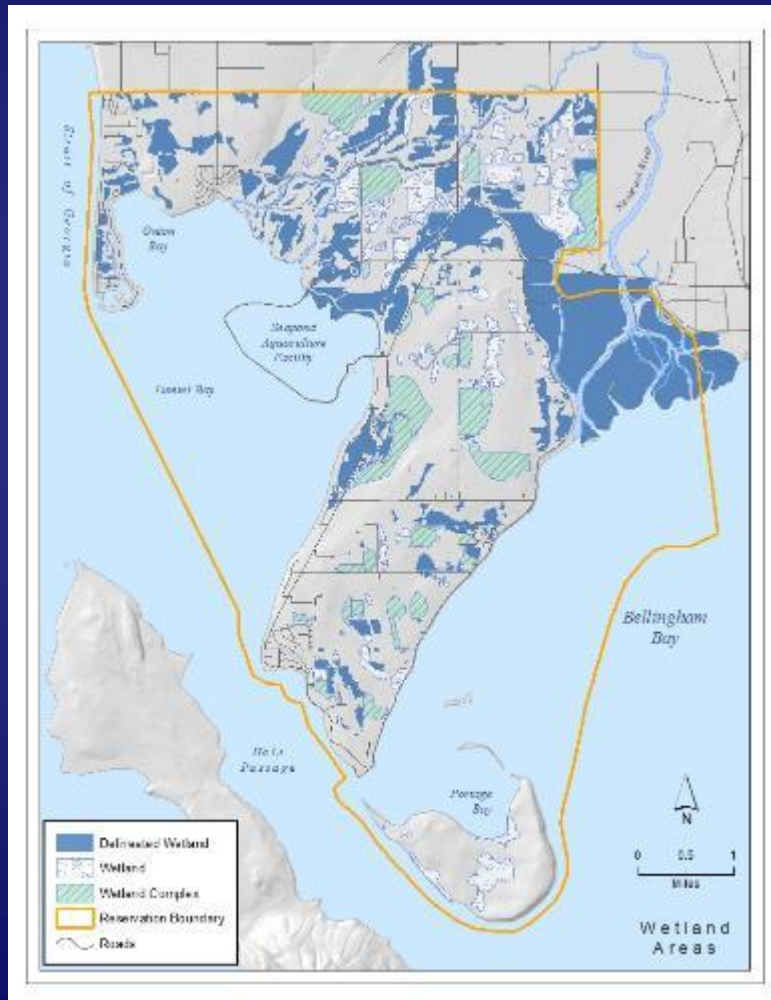
Nooksack River Estuary, circa 1880s







Why a Mitigation Bank?



- Reservation-wide wetland inventory in 1999 indicated that over 40% of the Reservation uplands are wetlands.
- The Lummi Nation needed an administratively efficient, technically sound, and legally defensible mechanism to effectively manage the Reservation wetland resources.



Why a Mitigation Bank?

Benefits of a Mitigation Bank:

- Mitigation banks provides “advanced” mitigation (i.e., ecological benefits occur prior to impacts).
- The size and location of mitigation banks can provide more of an ecological “lift” than smaller, distributed mitigation efforts.
- More accountable – higher success rates.
- More efficient use of permitting agency resources.
- More “value added” use of a limited land base than restoration projects, which generally have the same goals but different funding sources.

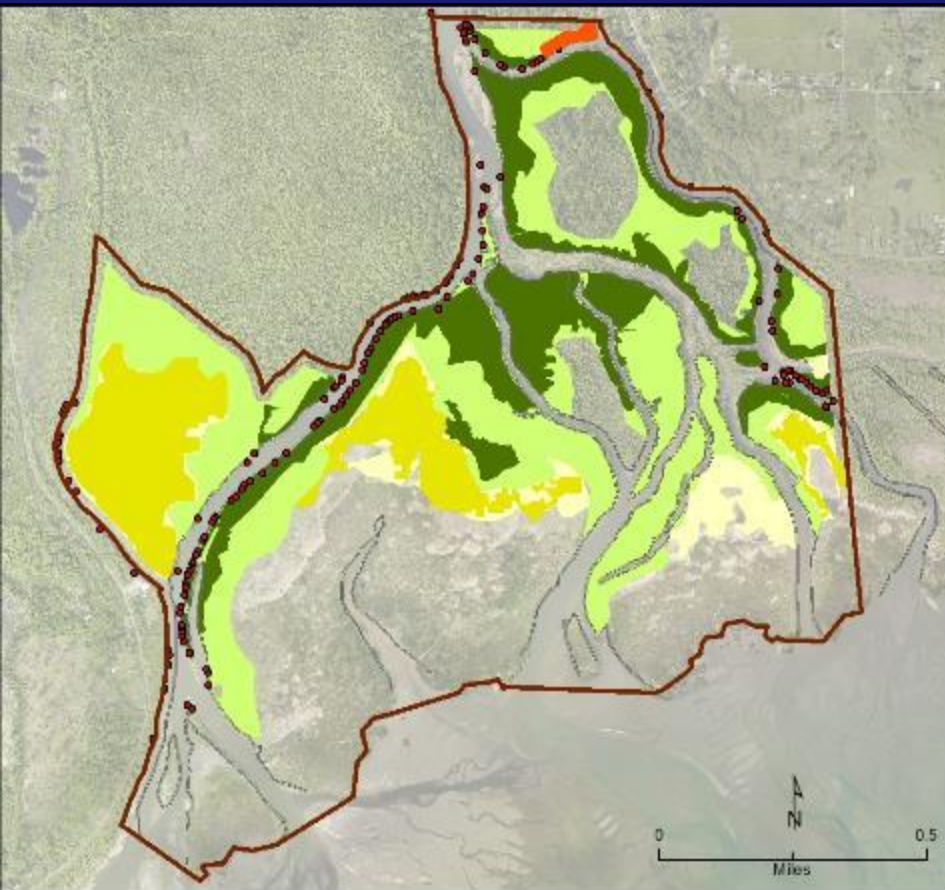


What is the Mitigation Bank?

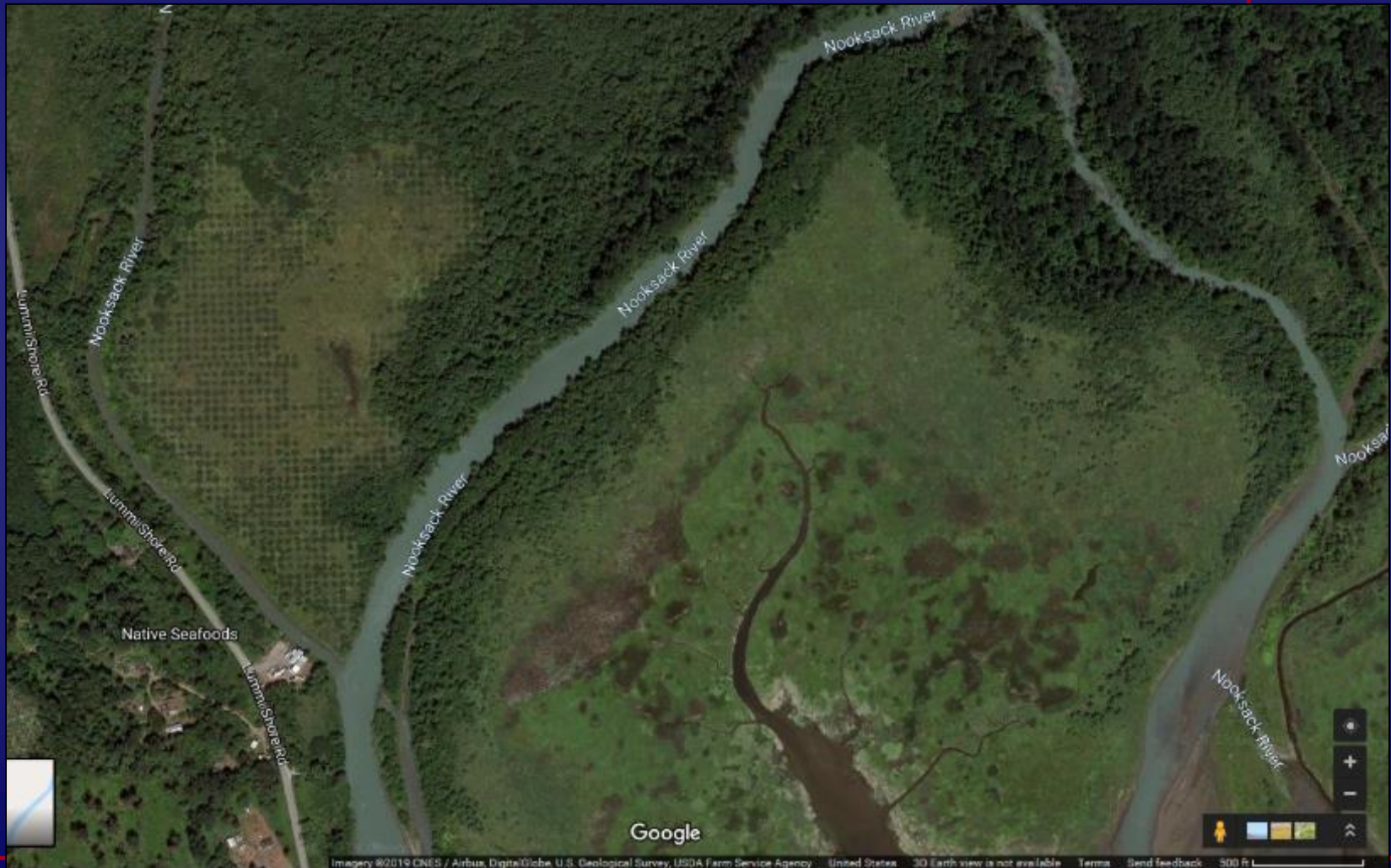


- Bank is comprised of approximately 1,965 acres on three separate sites on the Reservation: Nooksack Delta Site, Blockhouse Site, and the Lummi Delta Site.
- The bank is being developed in phases due to budget constraints and the need to own the entirety of each mitigation site – Lummi currently owns over 65 percent of the total area.
- The bank is part of an overall restoration effort of the estuary and is co-located with several restoration projects.

What is the Mitigation Bank: Nooksack Delta – Phase 1A



What is the Mitigation Bank: Nooksack Delta – Phase 1A



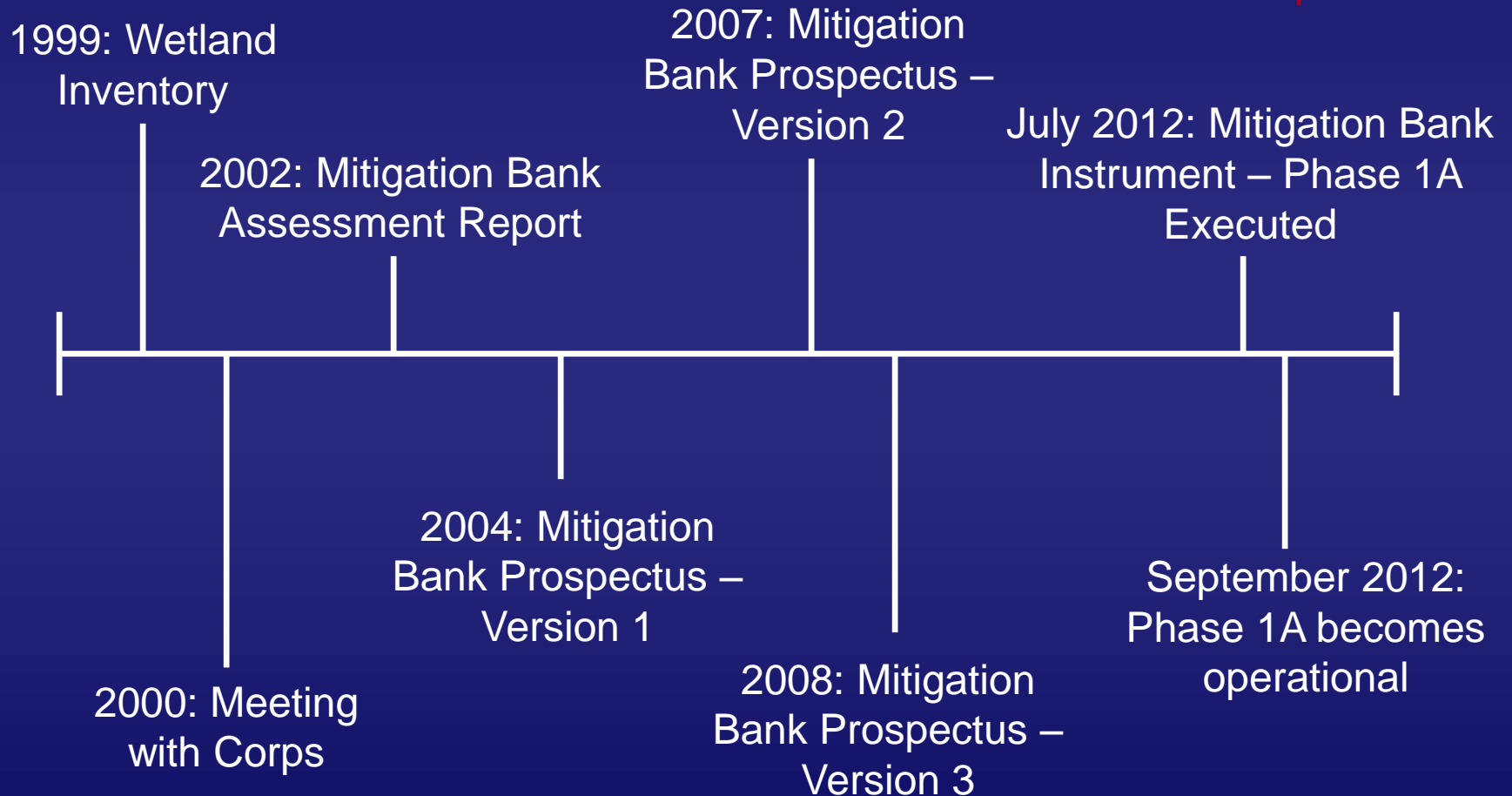


What is the Mitigation Bank?

Site	Credit Generating Activities	Acreage	Potential Credits
Nooksack Delta (Phase 1A and 1B)	Enhancement	1,179	239
Blockhouse (Phase 2)	Re-establishment, Rehabilitation	374	249
Lummi Delta (Phase 3)	Re-establishment, Rehabilitation	412	343
Total		1,965	831¹

¹ 728 credits used for planning purposes

When did the Mitigation Bank Become Operational?



How is the Mitigation Bank Administered?



- Development and Operation – Lummi Natural Resources Department (LNR)
- Decision Making – Inter-departmental Administrative Panel (LNR, Planning and Public Works, Cultural Resources)
- Interagency Review Team (IRT) – Corps, EPA, NMFS, USFWS, Ecology
- Land Ownership – Lummi Indian Business Council
- Conservation Easement – Northwest Indian Fisheries Commission (NWIFC)



Conservation Easement

- Lummi Nation reserved the right to Treaty-reserved, cultural, and religious uses in the area. For example:
 - Protection of historical and archaeological sites
 - Ceremonial, subsistence, and commercial fishing
 - Ceremonial and subsistence hunting
 - Trees, plant material, roots, and herbs for religious, spiritual, and cultural use







Adopted Credit Allocation

Market	No. of Credits	Percent Allocation
Individual Tribal Member Housing (Non-Commercial)	170	23.4
Tribal Government Housing Development Projects	170	23.4
Tribal Government Municipal Development Projects	169	23.2
Tribal Government Commercial Development Projects	169	23.2
Individual Tribal Member Commercial Development Project	25	3.4
Non-Member Development Projects	25	3.4
Total	728	100



Adopted Discount Rates

Market	Discount Rate	Cost Per Credit
Individual Tribal Member Housing (Non-Commercial)	100%	\$0
Tribal Government Housing Development Projects	50%	\$150,000
Tribal Government Municipal Development Projects	50%	\$150,000
Tribal Government Commercial Development Projects	25%	\$225,000
Individual Tribal Member Commercial Development Project	25%	\$225,000
Non-Member Development Projects	0%	\$300,000



Credit Sales To-Date

- 31.79 credits have been released by the IRT
- 41 transactions totaling 23.24 credits – \$5.1 million in revenue

Market	Credit Sales
Individual Tribal Member Housing (Non-Commercial)	0.50
Tribal Government Housing Development Projects	0
Tribal Government Municipal Development Projects	6.52
Tribal Government Commercial Development Projects	5.66
Individual Tribal Member Commercial Development Project	0
Non-Member Development Projects	10.56



Summary and Conclusion

- Establishing the Lummi Nation Wetland and Habitat Mitigation Bank represents a regionally significant opportunity for ecological restoration on a large scale and provides the Lummi Nation with an administratively efficient, technically sound, and legally defensible mechanism to effectively manage wetland resources.

- The Lummi Sche'lang'en ("way of life") is largely based on the ability to safely and sustainably harvest salmon and shellfish for commercial, ceremonial and subsistence purposes. The bank strengthens Lummi culture by protecting, restoring, and enhancing salmon and shellfish habitat.

- See LNR website for more information (<http://lnnr.lummi-nsn.gov/LummiWebsite/Website.php?PageID=66>)

Thank You.



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