Mitigation Statement

Project: Kaasda Heen Shaak Ph.2 Subdivision Development
Location: 600 Yaw Drive, Sitka, Alaska
Applicant: *Lucas Goddard / Baranof Island Housing Authority]*
USACE District: Alaska District

Mitigation Statement

In accordance with the compensatory mitigation requirements outlined in the Clean Water Act Section 404(b)(1) Guidelines and U.S. Army Corps of Engineers regulatory policies, this mitigation statement describes the steps taken to **avoid, minimize, and compensate** for impacts associated with the proposed subdivision development at 600 Yaw Drive in Sitka, Alaska.

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1. Avoidance

During project planning, we evaluated multiple layout configurations in order to avoid and reduce impacts to jurisdictional wetlands and to the anadromous salmon stream located on-site. As part of the avoidance strategy:

- We **excluded the entire northwest portion of the property** from development activities.
- This area surrounds the on-site **anadromous salmon stream** and protecting it was prioritized to ensure no direct impact to streambanks or hydrology.
- By not developing this section, we increased the natural **buffer area** around the salmon-bearing waterway, preserving riparian function, maintaining shade, minimizing erosion potential, and protecting habitat quality.

Avoidance measures have substantially reduced potential direct and indirect impacts to fish habitat and wetlands associated with the stream corridor.

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2. Minimization

To further reduce the overall project footprint and associated wetland impacts, we employed site design strategies that minimize ground disturbance:

- The project will be developed as a **Planned Unit Development (PUD)** to allow flexible lot design and smaller individual lot sizes.

- This approach allows us to accommodate the required number of housing lots while **reducing the total land area disturbed by development**.
- Roads, utilities, and infrastructure have been consolidated to reduce fragmentation and minimize fill placement within wetlands.
- Construction-phase best management practices (BMPs) will be implemented, including silt fencing, vegetation preservation where feasible, directional drainage controls, and restricted equipment access zones near the protected stream buffer.

These measures collectively reduce the project's spatial footprint and the duration and magnitude of construction-related impacts.

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3. Compensatory Mitigation

To offset unavoidable impacts associated with the subdivision, the project proposes **preservation** as the primary compensatory mitigation mechanism:

- The project will permanently preserve approximately 132,528 square feet (3.04 acres) of land adjacent to and encompassing an anadromous salmon stream. This preservation area includes riparian habitat, jurisdictional wetlands, and the stream corridor, all of which provide important ecological functions.
- The preservation area will be protected in perpetuity through legally enforceable mechanisms acceptable to the U.S. Army Corps of Engineers, which may include conservation easements, deed restrictions, and/or subdivision plat notes recorded with the final plat.
- The Applicant will coordinate with the Southeast Alaska Land Trust (SEALT) to convey the preserved property or otherwise provide land of equivalent ecological value in lieu of monetary compensation, if additional compensatory mitigation is required.
- The preserved area will remain undeveloped and protected from future disturbance, ensuring the long-term sustainability of aquatic resource functions, including water quality protection, flood attenuation, and habitat support.
- This mitigation strategy provides meaningful ecological benefits by maintaining and enhancing salmon habitat, supporting all life stages of anadromous fish species, preserving riparian buffer functions, and sustaining natural hydrologic and biogeochemical processes.

- The proposed mitigation is located within the same watershed as the project impacts and is expected to replace lost functions and values to the maximum extent practicable.

This compensatory mitigation fully offsets the limited unavoidable wetland impacts associated with the subdivision, consistent with mitigation sequencing and Corps guidance.

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4. Summary

The proposed development incorporates substantial avoidance and minimization measures and provides compensatory mitigation that protects valuable riparian and wetland functions. It accomplishes this by:

- Avoiding development in the northwest section of the property,
- Minimizing impacts through PUD-based reduced lot size and a consolidated project footprint, and
- Preserving **132,528 SF** of wetlands and a high-quality anadromous fish habitat
- We will be working with SEALT for compensation for any additional mitigation measures