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From: Little, Chris <clittle@conservationfund.org>  
Sent: Thursday, May 26, 2016 4:25 PM  
To: Alvarez, Calvin L POA  
Cc: Newman, Sheila M POA; Meiklejohn, Brad  
Subject: [EXTERNAL] Meeting with Calvin

Dear Calvin,

Thank you for taking the time to meet with me yesterday. I found our conversation to be very helpful to me and to The Conservation Fund's ILF Program.

Regarding the AR 5-8 proposed sites, TCF is not simply pushing the agendas of the National Park Service and the US Fish and Wildlife Service. Rather, TCF searches tirelessly of preservation opportunities, as well as other compensation opportunities, and, in the Arctic Service Area, we have looked at and turned down many potential projects. We strongly believe these inholding properties meet the criteria for preservation, regardless of who the landowners are, and that they are a good fit for the needs of the Arctic Service Area. We are engaged in other preservation opportunities in the Arctic S.A. where we think preservation has valid and needed. These projects involve conservation easements and private landowners, but the gestation for these projects is protracted due to the regulatory uncertainties and unpredictability, and thus, wary landowners.

Operating an ILF program aligns well with the missions, values, and goals of many conservation/natural resource entities. Our program in Alaska is not unique to the mitigation world, and land trusts and state natural resource agencies around the country operate effective ILF programs because of this alignment. The Conservation Fund is one of the best in the business on strategic preservation, so our AK ILF program is a natural fit. We have a long history of compensation success in Alaska (since the late 1990's) because of our non-stop collaboration, impressive results, and solid reputation. This is why our Instrument was signed and approved by the Corps in 2013, why we are viewed as a low-risk compensation option, and why we continue to operate a successful program, despite the regulatory uncertainties and headwinds.

TCF is committed to planning appropriately and transparently for potential mitigation sites, per the intent of the Rule to lower risk associated with ILF programs. We feel we have done everything in our power to do this, and we find it very frustrating when we get to the finish line only to have to turn back and start all over again. This costs us critical time and money, something a non-profit like The Conservation Fund can't afford. The Rule is intended not only to protect against the risks associated with ILF programs, but also the risks to ILF programs. This is critical and cannot be

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ignored.

I really appreciate your specific thoughts on the importance of defining the watershed and how the proposed mitigation site fits into that watershed, considering all the factors we discussed. I plan on revising the AR 5-8 mitigation plans to better address the watershed approach and analysis. I am still learning to speak the language of the Corps and Rule, and I will continue to work hard on the mitigation plans to they better communicate our case for proposed mitigation sites.

Warm Regards, Chris

Chris Little  
Alaska Conservation Acquisition Associate  
The Conservation Fund

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