

Wisconsin Wetland Conservation Trust



Annual Report for Fiscal Year 2020

(REPORTING PERIOD JULY 1, 2019 TO JUNE 30, 2020)

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Program Summary

The WWCT program has proven to be a successful method for permit applicants and exempt project proponents to satisfy their wetland compensatory mitigation obligations, enabling projects to move forward. After 5.5 years of operation, the WWCT is selling credits where mitigation bank credits are unavailable, meeting the need for permittees to acquire permits. Funds from permits have been allocated to 14 projects, with six in monitoring year 1, six in construction in 2020, and two additional projects in the site plan development phase.

Since establishment in 2014, applicants for permits impacting 402 acres have paid into the WWCT to fund projects that restore, enhance, create, and preserve wetlands. The program has encumbered funds to 13 projects in 10 different service areas, which are in the planning stages for the restoration or enhancement of 796 acres of wetlands.

During Fiscal Year 2020 (FY2020), the WWCT sold credits for 12 projects permitted by state and/or federal agencies. Fees were only received for credits sold in four service areas: \$397,779 in Upper Illinois, \$178,849 in Southwestern Lake Michigan, \$190,152 in Northwestern Lake Michigan, and \$45,560 in Upper Mississippi Black Root.

The 12 projects resulted in 15.51 acres of impacts to wetland resources. The most impacted wetland cover types were Wooded Swamp at 58% of impacts and Fresh Meadow at 34% of impacts.

A total of 11.19 credits were sold, which was less than the totals from the previous two fiscal years (42.68 and 70.19). At the end of the fiscal year, the WWCT program had a program liability of 373.83 credits and 416.17 credits available for purchase.

Three Request for Proposals (RFP) were issued during FY2020. The 2019 July 1 RFP was issued July 1, 2019 and open for 60 days. One project proposal was submitted in the Rock Service Area. The WWCT Technical Team met in September to review the proposal. After review and scoring, this project was not selected for pursuit of approval.

The 2019 December 1 RFP was issued December 1, 2019 and open for 60 days. No project proposals were submitted.

The 2020 March 1 RFP was issued March 1, 2020 and open for 60 days. No project proposals were submitted.

During FY2020, two new contracts were signed for WWCT projects, allocating \$2,982,000 to partners. Total allocated funds for projects at the end of FY2020 was \$17,527,523. Of these allocated funds, \$2,281,443 was planned to be held for an endowment for long-term management for 13 projects.

Introduction

This annual report is submitted to fulfill the requirements detailed in 33 CFR 332.8(i)(3)(i)-(v) as well as those listed in the Reporting Protocols section as detailed in Appendix A of the approved [WWCT Program Instrument](#). The information contained herein reflects the 2020 state of Wisconsin fiscal year reporting period from July 1, 2019 to June 30, 2020 (FY2020).

The Wisconsin Wetland Conservation Trust In-Lieu Fee Wetland Mitigation Program (WWCT) was established on November 19, 2014, through a legal agreement referred to as the Program Instrument, executed by signatories from the U.S. Army Corps of Engineers St. Paul District, the U.S. Environmental Protection Agency, and the Wisconsin Department of Natural Resources (WDNR), which acts as program Sponsor.

The purpose of establishing the WWCT was to provide an additional method of compensatory mitigation to offset unavoidable adverse impacts to wetland resources. The WWCT's goal is to complete wetland mitigation projects using a watershed approach.

Through the sale of credits, the WWCT accepts the legal responsibility to satisfy wetland compensatory mitigation requirements specified by US Army Corps of Engineers-St. Paul District permits authorized under Section 404 of the Clean Water Act, Section 10 of the River and Harbors Act, and WDNR Wetland Individual Permits pursuant to Chapter 281.36, Wis. Stats. The WWCT may also collect separate non-credit related funds including, but not limited to, those resulting from supplemental environmental projects, donations, and WDNR Wetland General Permit surcharge fees.

Credit Sales, Revenue, and Wetland Impacts

In FY2020, 12 ILF payments were received in 4 of the 12 service areas. These payments totaled \$812,340. A total of 11.19 advanced credits were sold, which is 31.49 fewer than were sold in FY2019. Total advanced credit sales and revenue in FY2020 were lower compared to average sales and revenue during the first 5 years of the program. **Appendix D** offers a complete list of all permitted impacts in FY2020 that generated WWCT payments with supporting details.

The following tables provide details on program revenue, credit sales, wetland impacts, and credit liability:

- **Table 1** shows program revenue and credit sales by quarter in FY2020.
- **Table 2** provides a comparison of program revenue and credit sale totals for all fiscal years of the WWCT's operation. The program sold 11.19 credits and received \$812,340 in fees for FY2020. This is lower than the totals over the program's first 5 years.
- **Table 3** shows total permitted wetland impacts using the WWCT for mitigation over the life of the program. With 15.28 acres impacted during FY2020, the total is now 402.69 acres.
- **Table 4** shows permitted impacts that paid fees into the WWCT by wetland cover type. There was a total of 15.28 acres of impacted wetlands, with Wooded Swamp accounting for 59% of the acres impacted. It should be noted that the standard ratio applied to impacts was 1.45 credits to 1 acre – to account for the state minimum ratio of 1.2:1 plus an additional 0.25:1 to address the temporal loss associated with selling advanced credits. Foxconn-related impacts were mitigated at a 2:1 ratio in accordance with state statute regarding Electronics and Information Technology Manufacturing (EITM) Zone projects (s. 281.36(4m) Wis. Stats.).
- **Table 5** describes credit sales and fees collected by service area. The WWCT operates in 12 service areas in Wisconsin (see **Appendix C – Service Area Map**). Credit sale transactions occurred in 4 of 12 service

areas: Upper Illinois, Southwestern Lake Michigan, Northwestern Lake Michigan, and Upper Mississippi Black Root. No credits were sold in the remaining 8 service areas.

- **Table 6** shows total program revenue including credit sales, non-credit surcharge fees collected from general permits, and interest from the various WWCT program funds.
- **Table 7** summarizes the total credit sales through the end of FY2020 and includes the WWCT’s compliance liability. Since no projects had yet requested credit releases, no credits had been fulfilled, so all sold advanced credits are shown here as credit discrepancies.

Table 1 – Program Credit Sales Summary for FY2020

| Quarter | Total Revenue | Total Advanced Credit Sales |
|------------------------|---------------------|-----------------------------|
| 1st Quarter of FY 2020 | \$7,090.00 | 0.10 |
| 2nd Quarter of FY 2020 | \$190,152.00 | 2.78 |
| 3rd Quarter of FY 2020 | \$415,908.00 | 5.73 |
| 4th Quarter of FY 2020 | \$199,190.00 | 2.58 |
| Total | \$812,340.00 | 11.19 |

Table 2 – Total Revenue and Credit Sales FY2015 to FY2020

| Fiscal Year | Revenue | Credits Sold |
|--------------|------------------------|---------------|
| 2015 | \$3,339,710.00 | 55.61 |
| 2016 | \$5,660,540.00 | 93.1 |
| 2017 | \$6,148,080.00 | 101.06 |
| 2018 | \$4,316,300.00 | 70.19 |
| 2019 | \$2,718,144.00 | 42.68 |
| 2020 | \$812,340.00 | 11.19 |
| Total | \$22,995,114.00 | 373.83 |

Table 3 – Permitted Wetland Impacts Using ILF from FY2015 to FY2020

| Fiscal Year | Total Wetland Acres Impacted |
|--------------------|-------------------------------------|
| 2015 | 38.51 |
| 2016 | 92.12 |
| 2017 | 183.48 |
| 2018 | 45.01 |
| 2019 | 26.78 |
| 2020 | 15.28 |
| Total | 402.69 |

Table 4 – Summary of Wetland Impacts by Cover Type for FY2020

| Wetland Cover Type | Acres Impacted |
|---|-----------------------|
| Shallow, Open Water | 0 |
| Deep and Shallow Marshes | 0.028 |
| Sedge Meadows | 0 |
| Fresh (Wet) Meadow | 5.292 |
| Wet to Wet-Mesic Prairie | 0 |
| Calcareous Fens | 0 |
| Bog (Open or Coniferous) | 0 |
| Shrub Swamp (Shrub-Carr or Alder Thicket) | 0.156 |
| Wooded Swamp (Hardwood or Coniferous) | 9.01 |
| Floodplain Forests | 0.25 |
| Seasonally Flooded Basins | 0.54 |
| Total | 15.28 |

Table 5 – Credit Sale Revenue by Service Area FY2020

| Invoice Number | NW Lake Michigan | SW Lake Michigan | Upper Illinois | Upper Miss Black Root | Administration | Contingency | TOTAL |
|----------------|------------------|------------------|------------------|-----------------------|-----------------|-----------------|------------------|
| 370-0000012421 | | | \$7,090 | | \$709.00 | \$354.50 | \$8,153.50 |
| 370-0000013411 | \$140,220.00 | | | | \$14,022.00 | \$7,011.00 | \$161,253.00 |
| 370-0000013904 | \$49,932.00 | | | | \$4,993.20 | \$2,496.60 | \$57,421.80 |
| 370-0000014257 | | | \$312,669 | | \$31,266.90 | \$15,633.45 | \$359,569.35 |
| 370-0000014370 | | | \$2,490 | | \$249 | \$125 | \$2,863.50 |
| 370-0000014657 | | \$60,918 | | | \$6,092 | \$3,046 | \$70,055.70 |
| 370-0000014578 | | \$26,554 | | | \$2,655 | \$1,328 | \$30,537.10 |
| 370-0000014717 | | \$13,277 | | | \$1,328 | \$664 | \$15,268.55 |
| 370-0000014802 | | | \$34,860 | | \$3,486 | \$1,743 | \$40,089.00 |
| 370-0000015674 | | \$78,100 | | | \$7,810 | \$3,905 | \$89,815.00 |
| 370-0000015702 | | | \$40,670 | | \$4,067 | \$2,034 | \$46,770.50 |
| 370-0000016323 | | | | \$45,560 | \$4,556 | \$2,278 | \$52,394.00 |
| TOTAL | \$190,152 | \$178,849 | \$397,779 | \$45,560 | \$81,234 | \$40,617 | \$934,191 |

Table 6 – Total Revenue FY2020

| Operating Unit | Fund Name | Revenue | Interest | Total Revenue |
|----------------|---|---------------------|---------------------|-----------------------|
| WCT01 | Non-Credit General Permit Surcharge Fee | \$37,500.00 | \$4,299.41 | \$41,799.41 |
| WCT02 | Administration | \$81,234.00 | \$22,843.48 | \$104,077.48 |
| WCT03 | Contingency | \$40,617.00 | \$16,960.71 | \$57,577.71 |
| WCT04 | Upper Mississippi Black Root | \$38,726.00 | \$24,125.00 | \$62,851.00 |
| WCT05 | Northwestern Lake Michigan | \$161,629.20 | \$31,669.09 | \$193,298.29 |
| WCT06 | Southwestern Lake Michigan | \$152,021.65 | \$35,172.30 | \$187,193.95 |
| WCT07 | Fox | \$0.00 | \$41,358.30 | \$41,358.30 |
| WCT08 | Upper Illinois | \$338,112.15 | \$51,170.18 | \$389,282.33 |
| WCT09 | Lower Wisconsin | \$0.00 | \$7,343.82 | \$7,343.82 |
| WCT10 | Upper Mississippi Maquoketa Plum | \$0.00 | \$0.00 | \$0.00 |
| WCT11 | Rock | \$0.00 | \$6,966.90 | \$6,966.90 |
| WCT12 | St Croix | \$0.00 | \$0.00 | \$0.00 |
| WCT13 | Upper Wisconsin | \$0.00 | \$14,470.61 | \$14,470.61 |
| WCT14 | Chippewa | \$0.00 | \$9,652.86 | \$9,652.86 |
| WCT15 | Lake Superior | \$0.00 | \$19,047.84 | \$19,047.84 |
| Total | | \$849,840.00 | \$285,080.50 | \$1,134,920.50 |

Table 7 – Credits Sold, Restored, Available, Liability, and Compliance Discrepancy

| Service Area | Advanced Credits (as of 6/30/2020) | | | | | | |
|------------------------|------------------------------------|---------------|----------|-----------|---------------|---------------|------------------------|
| | Authorized | Sold | % Sold | Fulfilled | Available | Liability | Compliance Discrepancy |
| Lake Superior | 75 | 30.61 | 77% | 0 | 44.39 | 30.61 | 30.61 |
| Chippewa | 50 | 11.29 | 23% | 0 | 38.71 | 11.29 | 11.29 |
| St Croix | 30 | 3.64 | 12% | 0 | 26.36 | 3.64 | 3.64 |
| Upper Miss. Black Root | 50 | 33.96 | 68% | 0 | 16.04 | 33.96 | 33.96 |
| Upper Wisconsin | 100 | 20.20 | 20% | 0 | 79.80 | 20.2 | 20.2 |
| Upper Miss. Maq. Plum | 30 | 0.00 | 0% | 0 | 30.00 | 0 | 0 |
| Lower Wisconsin | 40 | 28.12 | 70% | 0 | 11.88 | 28.12 | 28.12 |
| Rock | 90 | 8.95 | 10% | 0 | 81.05 | 8.95 | 8.95 |
| Upper Illinois | 40 | 32.74 | 82% | 0 | 7.26 | 32.74 | 32.74 |
| Upper Illinois S.R.* | 70 | 41.88 | 60% | 0 | 28.12 | 41.88 | 41.88 |
| Fox | 75 | 57.92 | 77% | 0 | 17.08 | 57.92 | 57.92 |
| NW Lake Michigan | 100 | 47.26 | 47% | 0 | 52.74 | 47.26 | 47.26 |
| SW Lake Michigan | 60 | 42.26 | 70% | 0 | 17.74 | 42.26 | 42.26 |
| SW Lake Michigan S.R.* | 15 | 15 | 100% | 0 | 0.00 | 15 | 15 |
| Total | 825.00 | 373.83 | - | 0 | 451.17 | 373.83 | 373.83 |

*The Interagency Review Team has approved these Special Request credits in the Upper Illinois and Southwestern Lake Michigan Services Areas to be used exclusively for impacts associated with the Foxconn Project.

Program Expenditures

The WWCT program spent \$305,817 on administration in FY2020, including salary, fringe, travel, and indirect expenses. Two contracts were signed allocating \$2,982,000 to projects. Invoices connected to twelve projects were paid out totaling \$2,310,670. No funds were spent from the contingency or surcharge fee budgets.

Table 8 – Total Expenditures FY2020

| | WCT02 | WCT04 | WCT05 | WCT06 | WCT07 | WCT08 | WCT09 | WCT11 | WCT13 | WCT14 | WCT15 | |
|---------------------------|---------------------|------------------------|---------------------|---------------------|---------------------|---------------------|--------------------|-----------------|---------------------|--------------------|---------------------|-----------------------|
| Budget Categories | Admin. | Upper Miss. Black Root | NW Lake Michigan | SW Lake Michigan | Fox | Upper Illinois | Lower Wisconsin | Rock | Upper Wisconsin | Chippewa | Lake Superior | Total |
| Salary | \$186,048.62 | | | | | | | | | | | \$186,048.62 |
| Fringe | \$62,968.52 | | | | | | | | | | | \$62,968.52 |
| Travel | \$4,971.38 | | | | | | | | | | | \$4,971.38 |
| Capital | | | | | | | | | | | | \$0.00 |
| Land | | | | | | | | | | | | \$0.00 |
| Supplies and Services | \$2,560.13 | | | | | | | | \$1,800.00 | | | \$4,360.13 |
| Baseline Data Collection | | \$63,000.00 | | | | | \$33.00 | | | \$1,171.50 | \$68.77 | \$64,273.27 |
| Design and Planning | | \$33,600.00 | | | \$20,961.97 | \$8,415.56 | \$593.25 | | | \$2,597.60 | | \$66,168.38 |
| Grant Admin. | | \$36,400.00 | | | \$3,893.50 | \$101.40 | \$7,775.00 | | | \$73.23 | \$12,604.92 | \$60,848.05 |
| Construction | | | \$155,514.71 | | \$386,690.09 | \$184,117.49 | \$88,640.38 | | | \$81,936.17 | \$161,249.59 | \$1,058,148.43 |
| Land Acquisition | | | | \$666,900.00 | | | | | \$110,000.00 | | \$181.23 | \$777,081.23 |
| Site Plan Development | | \$25,880.00 | \$32,016.04 | | \$60,408.96 | \$62,211.30 | \$17.98 | \$878.00 | \$97,629.29 | \$3,269.52 | \$39.75 | \$282,350.84 |
| Other | \$8,455.28 | | | | | | | | | | | \$8,455.28 |
| Total Direct | \$265,003.93 | \$158,880.00 | \$187,530.75 | \$666,900.00 | \$471,954.52 | \$254,845.75 | \$97,059.61 | \$878.00 | \$209,429.29 | \$89,048.02 | \$174,144.26 | \$2,575,674.13 |
| Total Indirect | \$40,813.91 | | | | | | | | | | | \$40,813.91 |
| Total Expenditures | \$305,817.84 | \$158,880.00 | \$187,530.75 | \$666,900.00 | \$471,954.52 | \$254,845.75 | \$97,059.61 | \$878.00 | \$209,429.29 | \$89,048.02 | \$174,144.26 | \$2,616,488.04 |

FY2020 Request for Proposals Summary

The WWCT Program switched from an annual RFP to a quarterly rolling RFP starting in 2018. Three RFPs were advertised in FY2020 from July 2019 to June 2020. Please note that RFP quarters are not tied to fiscal year quarters, and that the RFP schedule was altered in 2019 to better suit timing for financial quarterly statements ahead of advertised funding in the RFP.

The 2019 July 1 RFP was issued July 1, 2019 and closed August 31, 2019. Proposals were solicited for four service areas with \$3,970,000 in available funding (Table 9). One project proposal was submitted. The WWCT Technical Team met in September to review the proposal. The Rubicon Project was then not selected for pursuit of approval.

The 2019 December 1 RFP was issued December 1, 2019 and closed January 31, 2020. Proposals were solicited for two service areas with \$1,125,000 in available funding (Table 10) No project proposals were submitted.

The 2020 March 1 RFP was issued March 1, 2020 and closed April 30, 2020. Proposals were solicited for two service areas with \$1,250,000 in available funding (Table 11) No project proposals were submitted. Proposals for all of FY2020 are summarized in Table 12.

Table 9 – 2019 July 1 RFP

| Service Area Name | Service Area HUC | Minimum Credit Generation | Total Available Funding |
|-------------------|------------------|---------------------------|-------------------------|
| Upper Illinois | 071200 | 45 | \$2,250,000 |
| SW Lake Michigan | 040400 | 13 | \$600,000 |
| Rock | 070900 | 9 | \$470,000 |
| Fox | 040302 | 23 | \$1,151,204 |

Table 10 – 2019 December 1 RFP

| Service Area Name | Service Area HUC | Minimum Credit Generation | Total Available Funding |
|-------------------|------------------|---------------------------|-------------------------|
| SW Lake Michigan | 40301 | 13 | \$550,000 |
| Lake Superior | 040103 | 14 | \$575,000 |

Table 11 – 2020 March 1 RFP

| Service Area Name | Service Area HUC | Minimum Credit Generation | Total Available Funding |
|-------------------|------------------|---------------------------|-------------------------|
| SW Lake Michigan | 40400 | 13 | \$600,000 |
| Lake Superior | 040103 | 14 | \$650,000 |

Table 12 – FY2020 RFP Applications Summary

| Date | Applicant | Project Name | Service Area | Requested ILF Funds | Proposed Credits | Status |
|----------|-------------------------|--------------|--------------|---------------------|------------------|--------------|
| 2019 Aug | Langenecker Enterprises | Rubicon | Rock | \$470,000 | 7.2 | Not selected |

Credit Fee Evaluation

WWCT credit fees have 3 parts: the project portion (85%), administration cost (10%), and contingency cost (5%). The project portion of the fee is set for each service area according to the full cost accounting of wetland mitigation projects. WWCT reviews credit prices annually and if an update is determined to be needed, sets the new prices on January 1.

Because no projects have been fully completed to the end of the monitoring period, the WWCT has used and continues to use estimates for the service area portion of the credit fee. Each year, the WWCT will analyze true cost accounting to compare these estimates to on the ground costs. Once enough project cost data has accumulated, the WWCT will consider project success, true costs, and watershed needs to determine the most accurate credit price structure.

Project Portion: Land Values and Project Implementation

Approximate land values are determined using the U.S. Department of Agriculture’s National Agricultural Statistics Service (NASS) land sales data ([9/24/2020: Total Agricultural Land Sales - 2019](#)). For the 2021 calendar year credit fees, county land values were averaged into service areas and a one-year change in values was analyzed for potential credit price changes.

Table 13 – Land Value Estimates by Service Area

| Service Area | 2018 NASS Land Value Estimates per Acre | 2018 Ag Land Value per Credit (0.6:1 ratio) | 2019 NASS Land Value Estimates per Acre | 2019 FINAL Ag Land Value per Credit (0.6:1 ratio) |
|------------------------|---|---|---|---|
| Lake Superior | \$1,455.29 | \$2,425.48 | \$1,470.13 | \$2,450.22 |
| St. Croix | \$3,647.60 | \$6,079.33 | \$4,054.25 | \$6,757.08 |
| Chippewa | \$4,219.94 | \$7,033.23 | \$4,361.73 | \$7,269.55 |
| Upper Wisconsin | \$3,890.84 | \$6,484.73 | \$4,026.64 | \$6,711.07 |
| Lower Wisconsin | \$6,069.88 | \$10,116.47 | \$5,462.38 | \$9,103.97 |
| Upper Miss. Black Root | \$4,739.01 | \$7,898.34 | \$4,786.25 | \$7,977.08 |
| Upper Miss. Maq. Plum | \$6,103.66 | \$10,172.77 | \$5,876.19 | \$9,793.65 |
| Rock | \$8,187.53 | \$13,645.89 | \$7,695.49 | \$12,825.82 |
| Upper Illinois | \$12,391.49 | \$20,652.48 | \$9,803.26 | \$16,338.77 |
| SW Lake Michigan | \$9,898.56 | \$16,497.59 | \$8,460.60 | \$14,101.00 |
| Fox | \$6,398.11 | \$10,663.51 | \$5,865.37 | \$9,775.62 |
| NW Lake Michigan | \$7,893.01 | \$13,155.01 | \$7,375.23 | \$12,292.05 |

For 2021, inflation rates from the 2019-2020 Producer Price Index in Management, Scientific, and Technical Consulting Services (-6.2%) and Construction (1.2%) Sectors were also evaluated for potential price increases. (see Appendix A for full credit fee methodology). The WWCT must account for the possibility of a title fee acquisition on every project and ensure that funds are available to carry out a full wetland mitigation project from planning to long-term management.

Other Project Cost Factors

In addition to reviewing land value and price index data, the WWCT also considered patterns in credit sales and project budgets in determining credit costs for calendar year 2021. WWCT credit sales have slowed significantly to 42 credits sold in FY2019 and only 11 credits sold in FY2020. Also, at least some mitigation bank credits are forecasted to be available in all service areas over the next several years, meaning that WWCT credit sales are likely to remain low. Because the WWCT is required by federal rule to construct projects within three years of selling the first credit in a service area, the WWCT is expecting to need to implement mitigation on smaller project sites with smaller budgets over the next five years. Land costs are a greater percentage of total project costs on smaller project sites (sites of 40 acres or less), and costs for project planning, design, construction, and monitoring are less efficient per credit on smaller sites, resulting in the need for more project funds per credit. After weighing all factors, the WWCT has decided to keep the same credit fees for calendar year 2021 (Table 14).

Table 14 – Credit Fee Schedule for Calendar Year 2021

| Service Area | 2020 Credit Fee (1/1/2020 - 12/31/2020) | 2021 Credit Fee (1/1/2021 - 12/31/2020) |
|------------------------|--|--|
| Lake Superior | \$61,500.00 | \$61,500.00 |
| St. Croix | \$65,800.00 | \$65,800.00 |
| Chippewa | \$67,000.00 | \$67,000.00 |
| Upper Wisconsin | \$66,300.00 | \$66,300.00 |
| Lower Wisconsin | \$70,600.00 | \$70,600.00 |
| Upper Miss. Black Root | \$68,000.00 | \$68,000.00 |
| Upper Miss. Maq. Plum | \$70,700.00 | \$70,700.00 |
| Rock | \$74,700.00 | \$74,700.00 |
| Upper Illinois | \$83,000.00 | \$83,000.00 |
| SW Lake Michigan | \$78,100.00 | \$78,100.00 |
| Fox | \$71,200.00 | \$71,200.00 |
| NW Lake Michigan | \$74,200.00 | \$74,200.00 |

Project Activity

At the end of FY2020, the WWCT had 14 active projects. During the year, the program submitted five prospectuses, two draft compensation site plans, and two final compensation site plans. Initial biological and physical improvements and earthwork were completed on seven projects, and full construction was completed on six projects.

Table 15 – WWCT Project Activity Summary

| Project Name | Acres | Credits | Prospectus Submitted | Draft Compensation Site Plan Submitted | Final Compensation Site Plan Submitted | Initial Biological and Physical Improvements Complete | Earthwork Complete | Seeding and Planting Complete |
|----------------------|------------|------------|----------------------|--|--|---|--------------------|-------------------------------|
| Nothern Family Farms | 40.11 | 35.60 | | | | √ | √ | √ |
| Mukwonago Davis | 51.59 | 23.10 | | | | √ | √ | √ |
| Bohn Farms | 82.37 | 39.56 | | | √ | √ | √ | √ |
| Woodland Dunes | 78.96 | 50.16 | | | | √ | √ | |
| Fronney Road | 40 | 21.00 | | | √ | √ | √ | √ |
| Hallie Marsh | 42.65 | 16.00 | | | | √ | √ | √ |
| Soik | 59.36 | 36.57 | | | | √ | √ | √ |
| McMillan Marsh* | TBD | TBD | | √ | | | | |
| Te Stroete* | TBD | TBD | | | | | | |
| Meachem Road* | TBD | TBD | √ | √ | | | | |
| Heinze* | TBD | TBD | √ | | | | | |
| Hickory Hill* | TBD | TBD | √ | | | | | |
| Evansville* | TBD | TBD | √ | | | | | |
| Brule River* | TBD | TBD | √ | | | | | |
| Total | 395 | 222 | 5 | 2 | 2 | 7 | 7 | 6 |

*These projects were in development on June 30, 2020, and propose to protect 420 acres and generate over 200 credits.

Three Growing Season Timelines

The Federal Compensatory Mitigation Rule states that ILF programs must complete initial biological and physical improvements on a project in a service area within three growing seasons of the first mitigation credit being sold. At the end of FY2020, the WWCT was behind on active timelines in 6 service areas. Three projects were developed and are planned for construction to reset timelines by the end of 2020: the McMillan Marsh project in Upper Wisconsin, the Meachem Road project in Southwestern Lake Michigan, and the Hickory Hill project in Upper Illinois. In Rock, Fox, and Lake Superior, projects were in development to meet credit liabilities but are expected to be constructed in 2021. WWCT is preparing extension request letters for those three service areas.

Table 16 – WWCT Three-Growing Season Timeline Summary

| Service Area | First Credit Sale | Three Growing Season Deadline | WWCT Progress |
|------------------|-------------------|-------------------------------|--|
| Upper Wisconsin | 12/5/2015 | 11/1/2018 | McMillan Marsh construction in November 2020 |
| SW Lake Michigan | 8/20/2015 | 11/1/2018 | Meachem Road construction in November 2020 |
| Upper Illinois* | 3/29/2017 | 11/1/2019 | Hickory Hill construction planned in winter 2021 |
| Rock | 7/20/2015 | 11/1/2018 | Evansville construction planned in summer 2021 |
| Fox* | 8/18/2016 | 11/1/2019 | Heinze construction planned in summer 2021 |
| Lake Superior* | 7/15/2016 | 11/1/2019 | Brule River construction planned in fall 2021 |

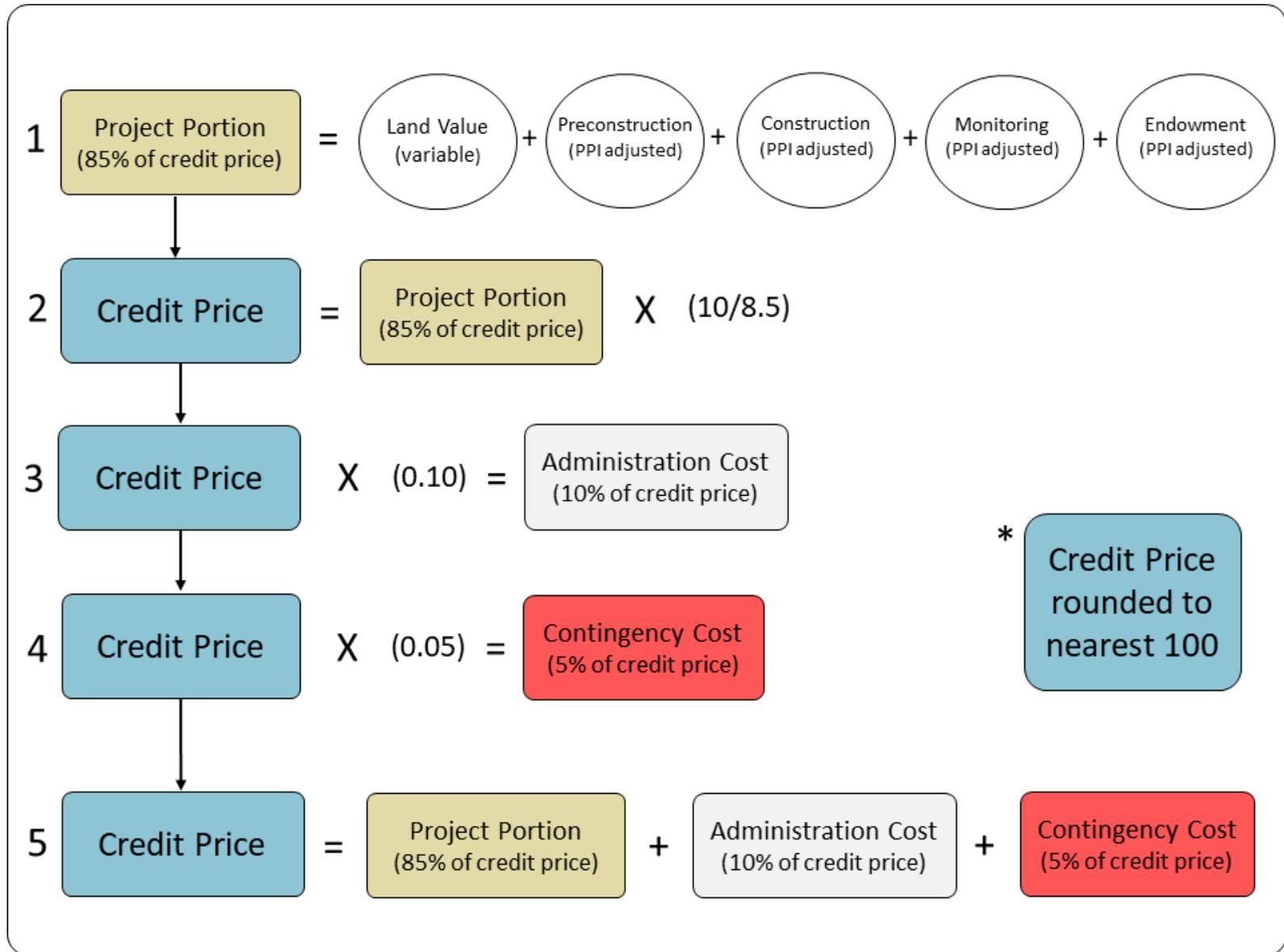
*These service areas have previous credit sales, which are proposed to be fulfilled by a constructed project

Additional Information

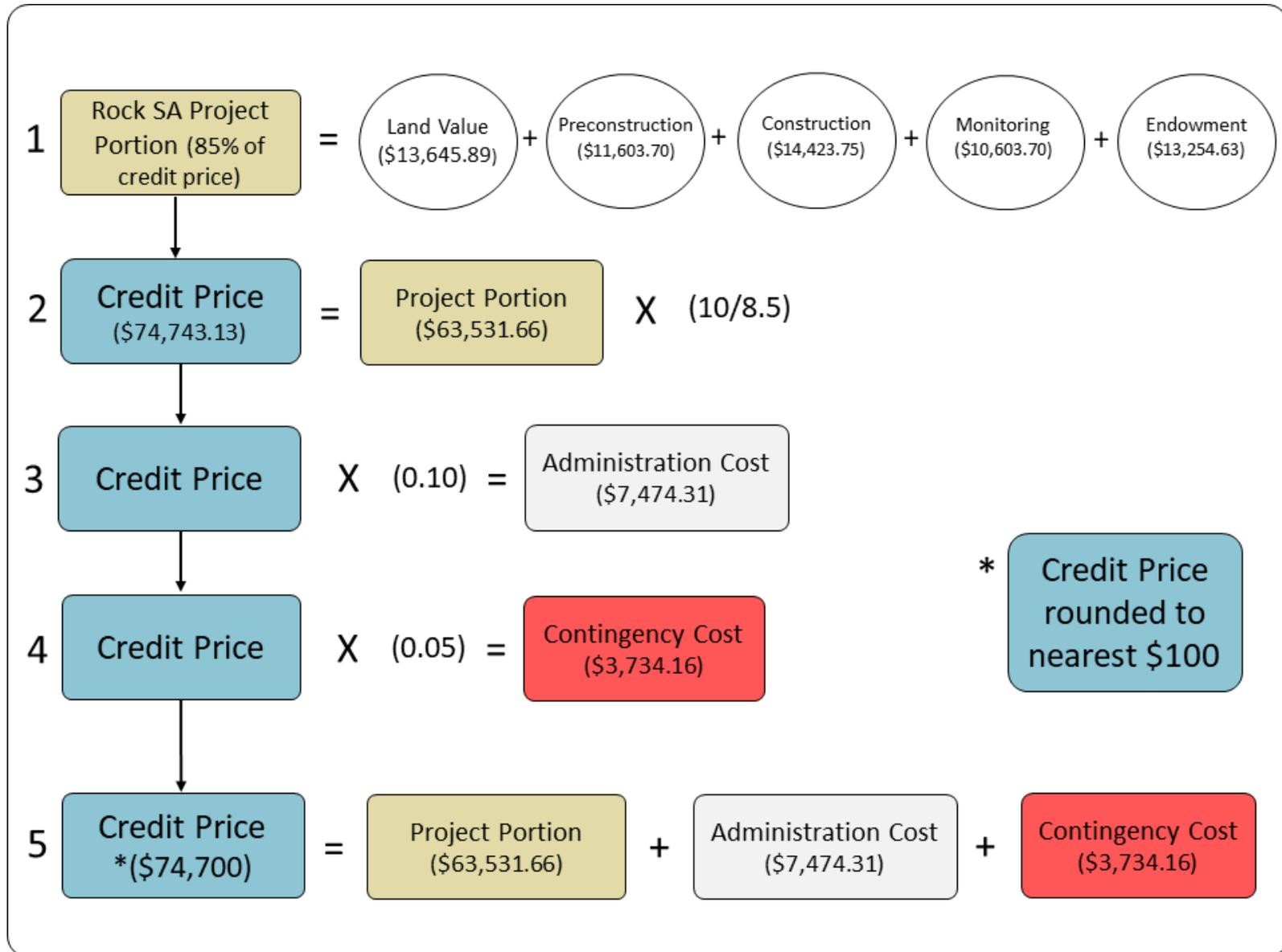
Additional information on WWCT can be found at <http://dnr.wi.gov/topic/Wetlands/mitigation/WWCT.html>

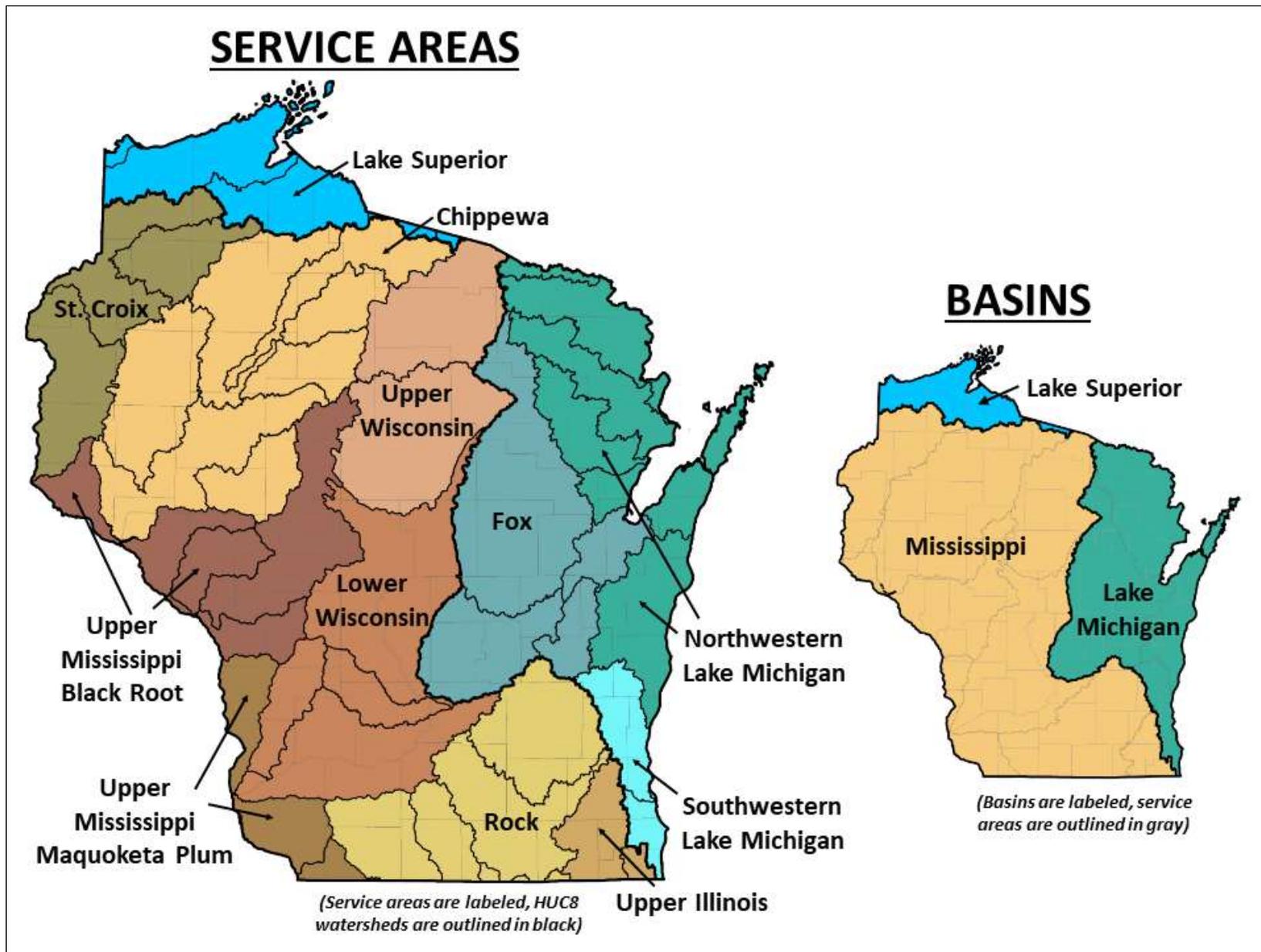
Additional information on WWCT’s RFP process can be found at <http://dnr.wi.gov/Aid/wwct.htm>

Appendix A – Calendar Year 2020 Credit Fee Schedule Methodology



Appendix B – Calendar Year 2020 Credit Price Methodology Rock Service Area Example





Appendix D – FY2020 Overall Credit Sale Ledger

| Service Area | Invoice # | Purchase Date | Project Name | County | Municipality | TRS | DNR Permit Number | Corps Permit Number | Acres Impacted | Credit Ratio | Advanced Credits Sold | Credit Price | Total Invoice |
|------------------|----------------|---------------|---|-----------|-----------------------------|-----------------|----------------------|---------------------|----------------|--------------|-----------------------|--------------|---------------|
| UPPER ILLINOIS | 370-0000012421 | 8/2/2019 | SIO International Foxconn Parcel 507 | Racine | Village of Mt. Pleasant | T3N, R22E, S32 | NA - EITM Zone | NA | 0.05 | 2:1 | 0.1 | \$70,900.00 | \$7,090.00 |
| NW LAKE MICHIGAN | 370-0000013411 | 11/15/2019 | WPS West Chilton to Plymouth | several | several | several | IP-NE-2019-8-N00373 | MVP-2019-00358-ANM | 8.99 | 0.23:1 | 2.05 | \$68,400.00 | \$140,220.00 |
| NW LAKE MICHIGAN | 370-0000013904 | 12/30/2019 | WPS Sobieski Substation | Oconto | Town of Little Suamico | T26N, R20E, S22 | IP-NE-2019-43-N03971 | MVP-2019-02824-ANM | 0.5 | 1.45:1 | 0.73 | \$68,400.00 | \$49,932.00 |
| UPPER ILLINOIS | 370-0000014257 | 1/28/2020 | Route 142 Uline | Kenosha | City of Kenosha | T2N, R21E, S24 | IP-SE-2019-30-03574 | 2015-02585-JRS | 3.04 | 1.45:1 | 4.41 | \$70,900.00 | \$312,669.00 |
| UPPER ILLINOIS | 370-0000014370 | 2/6/2020 | Towne Realty Salem Business Park | Kenosha | Salem Township | T1N, R20E, S27 | EXE-SE-2020-30-00022 | MVP-2015-02710-AIS | 0.2 | 1.45:1 | 0.03 | \$83,000.00 | \$2,490.00 |
| SW LAKE MICHIGAN | 370-0000014307 | 3/4/2020 | Kenosha Georgetown Water Quality and Flood Control Facility | Kenosha | Village of Pleasant Prairie | T1N, R22E, S2 | IP-SE-2019-30-03763 | 2019-02601-AJK | 0.54 | 1.45:1 | 0.78 | \$78,100.00 | \$60,918.00 |
| SW LAKE MICHIGAN | 370-0000014578 | 3/5/2020 | City of Oak Creek Lake Vista North | Milwaukee | City of Oak Creek | T6N, R22E, S24 | INF-SE-2019-41-02247 | NA | 0.235 | 1.45:1 | 0.34 | \$78,100.00 | \$26,554.00 |
| SW LK MICH | 370-0000014717 | 3/30/2020 | Village of Mt. Pleasant TID5 Wisconn Valley Way Conveyance | Racine | Village of Mt. Pleasant | T3N, R22E, S30 | EXE-SE-2020-52-00482 | NA | 0.12 | 1.45:1 | 0.17 | \$78,100.00 | \$13,277.00 |
| UPPER IL | 370-0000014802 | 4/13/2020 | Bristol Highlands Commerce Center | Kenosha | Village of Bristol | T1N, R21E, S13 | EXE-SE-2019-30-02426 | NA | 0.29 | 1.45:1 | 0.42 | \$83,000.00 | \$34,860.00 |
| SW LK MICH | 370-0000015674 | 6/2/2020 | Cedarburg Business Park | Ozaukee | City of Cedarburg | T10N, R21E, S22 | EXE-SE-2020-46-01491 | NA | 0.69 | 1.45:1 | 1 | \$78,100.00 | \$78,100.00 |

| | | | | | | | | | | | | | |
|------------|----------------|-----------|------------------------------------|---------|--------------------|----------------|---|--------------------|------|--------|------|-------------|-------------|
| UPPER IL | 370-0000015702 | 6/18/2020 | Bristol Business Park | Kenosha | Village of Bristol | T1N, R21E, S23 | EXE-SE-2020-30-01123, IP-SE-2020-30-00305 | 2017-00036-AJK | 0.34 | 1.45:1 | 0.49 | \$83,000.00 | \$40,670.00 |
| UP MS BLRT | 370-0000016323 | 6/25/2020 | Fort McCoy Area C Stream Crossings | Monroe | Town of Grant | T19N, R2W, S32 | IP-WC-2020-42-00533 | MVP-2020-00342-SJW | 0.46 | 1.45:1 | 0.67 | \$68,000.00 | \$45,560.00 |

Wisconsin Wetland Conservation Trust Activities in FY2020

Site Development – 5

In FY2020, WWCT developed and submitted prospectuses for 5 new projects that propose to protect 290 acres and generate 150 wetland credits. These projects are planned to be constructed by fall 2021.

Compensation Site Plan – 2

In FY2020, WWCT developed and submitted compensation site plans for 2 projects that protect 110 acres and propose to generate 72 wetland credits. These projects are planned to be constructed by fall 2020.

Construction Completed - 7

The first 7 WWCT projects were constructed in 2020 and are now entering the monitoring phase. These 395 acres will be permanently protected and are approved to generate up to 222 wetland credits.

Program Summary

The WWCT has 14 active projects including 7 in the monitoring phase, totaling 800 protected acres and proposed to create 430 wetland credits.

Project Timeline

