Annual Report – Calendar Year 2024
Kentucky Wetland and Stream Fee-In-Lieu-of Mitigation Program

In Accordance with
"Modification of the Agreement Concerning In-Lieu-Mitigation Fees between the
U.S. Army Corp of Engineers and the
Kentucky Department of Fish and Wildlife Resources"

LRL-2010-325
LRN-2011-00709
MVN-2011-521

February 2025

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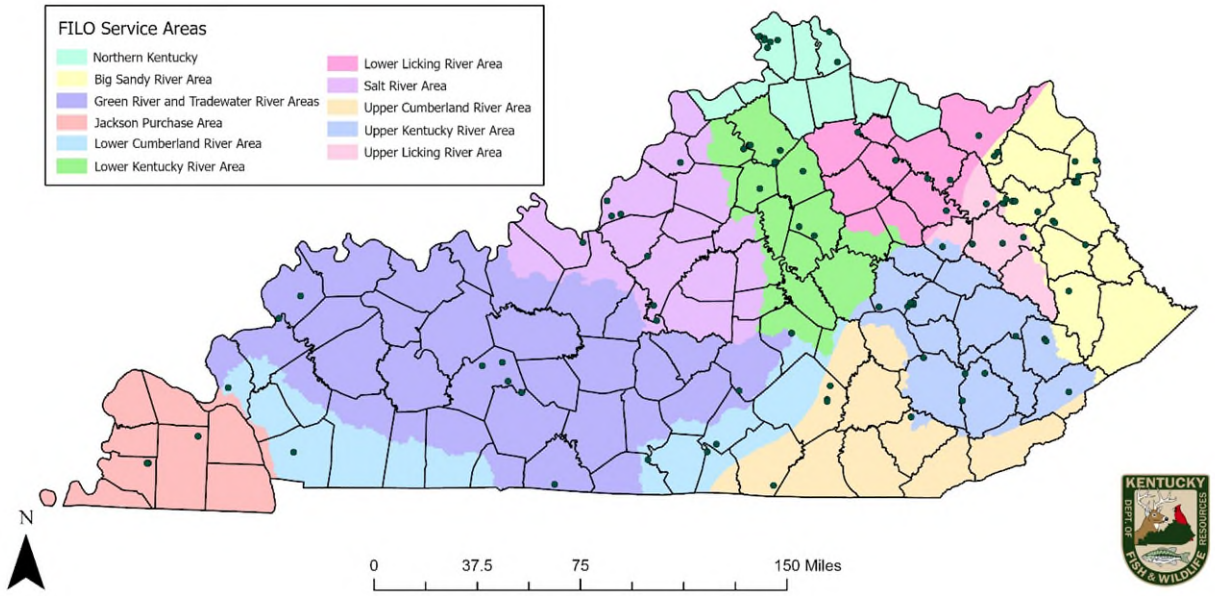
Introduction

This report provides information on the Kentucky Wetland and Stream Mitigation "Fee-In-Lieu-of" (FILO) Program sponsored by the Kentucky Department of Fish and Wildlife Resources (KDFWR) for the calendar year 2024 (CY24). The FILO program, in its current form, operates statewide and is organized by 11 service areas, with each service area functioning for stream and wetland mitigation purposes in accordance with permittable impacts to federally jurisdictional waters as defined in the Clean Water Act Sections 404 and 401, and the subsequent guidance and rulings, most notably the 2008 Mitigation Rule. The purpose of programs like FILO is to provide an appropriate source for mitigation associated with federal and state regulations for impacts to Waters of the United States (WOTUS). Being a mitigation source, the program is responsible for creating ecological lift [as credits] in jurisdictional and related aquatic ecosystems, to offset unavoidable, permittable, impacts such as those often associated with commercial, industrial, and infrastructure developments, public and private. As ecological credits are tied to aquatic habitat, permittees are able to make monetary transactions called In-Lieu-Fees (ILFs) commensurate with offsetting necessary impacts. The program then utilizes those ILF funds to implement projects to create more ecological credits. Thus, a balance is created to ensure that impacts and/or losses to aquatic ecosystems are minimized, while high value aquatic ecosystems are restored and conserved.

Figure 1: FILO Project Locations 2002-2024



Program History

In July 2000, the Kentucky Legislature passed KRS 150.255, which established The Kentucky Wetland and Stream Mitigation Fund. The FILO program manages this fund to provide a consistent and successful approach to fulfill compensatory mitigation requirements. October 2002 through January 2012 is considered pre-transition. During this time, the FILO program

operated under the “Agreement Concerning In-Lieu Mitigation Fees between KDFWR and the U.S. Army Corps of Engineers” (Agreement). This Agreement, in conjunction with KRS 151.255, established that the Wetland and Stream Mitigation Trust Fund within KDFWR may receive mitigation ILFs from Department of Army permittees. In exchange, KDFWR would identify, assess, and with approval from an interagency mitigation review team (MRT, discussed more below) implement stream and wetland restoration projects in Kentucky. There was no credit system defined in Kentucky prior to the 2008 Mitigation Rule. At that time impacts, mitigation projects, and ILF transactions were defined by linear feet of streams, and acres of wetlands. The MRT would approve In-Lieu-Fee rates, funding amounts for individual mitigation project stages and other FILO program actions.

In January 2012, a new operating mechanism was finalized. The Agreement was replaced to comply with the 2008 Mitigation Rule (USACE 2008) and the resulting document is referred to as the Instrument (USACE 2011). This “transition” from Agreement to Instrument separates pre-transition and post-transition and is why much of the compliance data starts with the year 2012. The Instrument delineated Kentucky into 10 (ten) service areas: Upper Kentucky River, Lower Kentucky River, Upper Cumberland River, Lower Cumberland River, Upper Licking River, Lower Licking River, Big Sandy River, Green River, Salt River, and Jackson Purchase Service Areas. A 2018 modification of the Instrument between USACE and KDFWR (USACE 2018) added the Northern Kentucky Service Area (**Figure 1 and Figure 36**). Prior to 2018, the only ILF style program in Northern Kentucky was operated within the Northern Kentucky University (NKU) Center for the Environment. This NKU program still functions today in the same capacity and focuses on mitigation project types that provide ecological learning opportunities for NKU students. In 2022, a minor modification to the instrument was made to increase the initial credit allotment for stream credits in the Northern Kentucky Service Area and for the initial credit allotment for wetlands in the Salt River Service Area. This report includes information required under the terms of the Instrument and additional information related to the program for activities in CY24, as well as data since 2012 to provide important context for service area status and project progress.

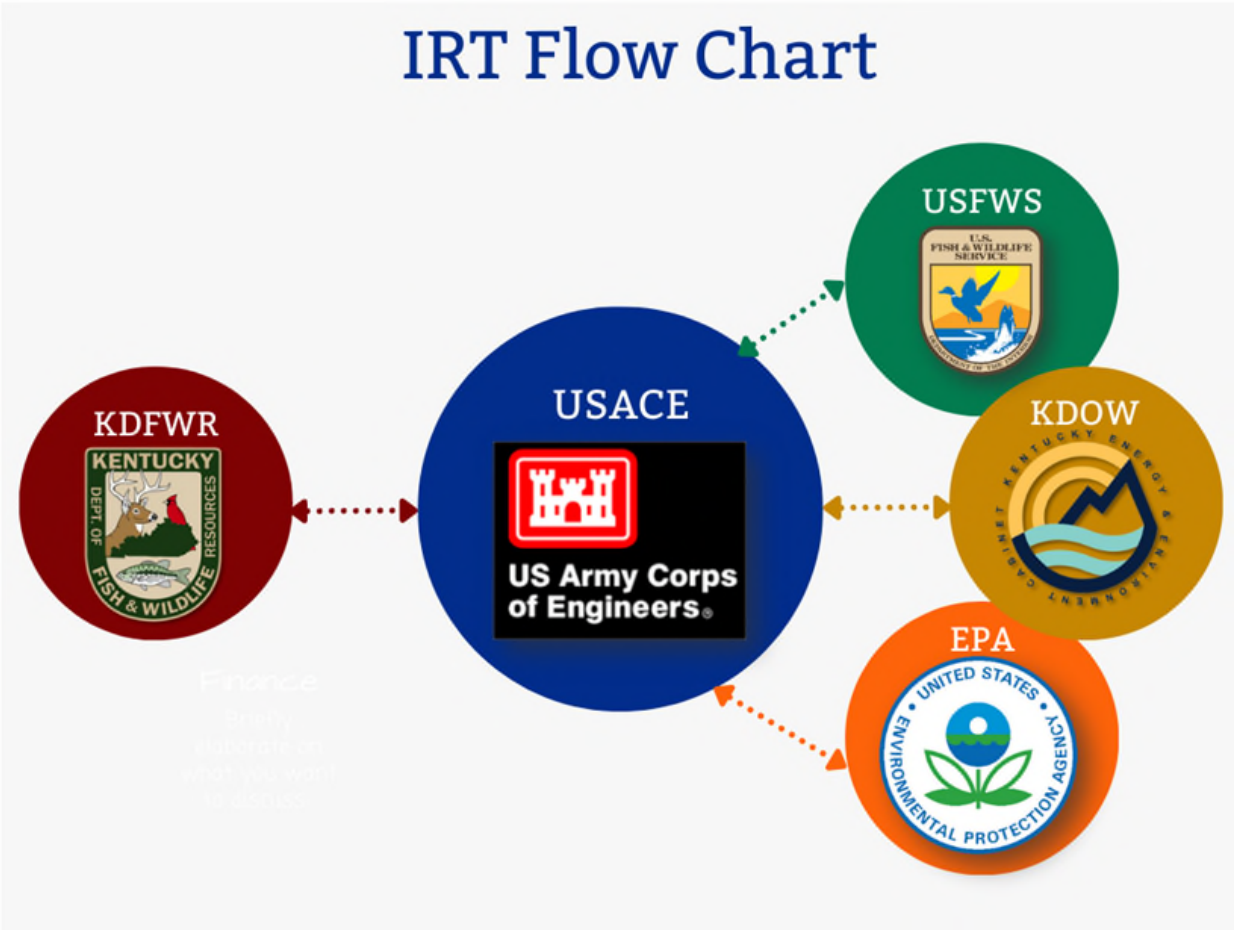
There are two options defined in the 2008 mitigation Rule for 404 permit applicants to satisfy compensatory mitigation requirements by purchase of mitigation credits in-lieu of performing the mitigation themselves. The primary option, when available, is to purchase credits either first from a private mitigation bank or if no viable mitigation bank is available, a permit applicant may purchase credits from an in-lieu-fee mitigation program, also if available. This method of mitigation is termed “in-lieu-fee mitigation”. If no viable bank or in-lieu-fee program is available, then permit applicants must meet the requirements for mitigation by performing the mitigation themselves. The FILO program is a KDFWR sponsored in-lieu-fee mitigation program that is available statewide, supported exclusively by sales of mitigation credits to Section 404 permit applicants to satisfy regulatory requirements. The monies generated by these in-lieu-fees are then used to fund stream and wetland projects that conserve high quality aquatic habitat or improve degraded habitat in streams and wetlands throughout the Commonwealth.

The Instrument between the sponsor and the USACE ensures that the mitigation completed is sufficient to compensate for losses, provides for permanent protection and long-term management, and adheres to applicable federal and state regulations and guidelines. By

accepting in-lieu-fee payments, the sponsor is assuming responsibility to provide compensatory mitigation pursuant to the terms of the Instrument established with the USACE. By purchasing credits from an in-lieu-fee program, developers seeking USACE permits are relieved of mitigation obligations.

The Instrument defines the role of an Interagency Review Team (IRT) pursuant to federal rules. The Kentucky Interagency Review Team (formerly referred to as the Kentucky MRT) has and continues to oversee the FILO program, though the mechanics of its relationship evolved over time. The IRT is made up of: U.S Army Corps of Engineering (USACE), U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), Kentucky Division of Water (KDOW), and KDFWR.

Figure 2: IRT Flow Chart for FILO Program Projects.



The USEPA, while a part of the IRT is not a signatory agency to the [FILO] Instrument but can provide comments on individual mitigation projects during the USACE permit process. The function of the IRT is to review and comment on proposed projects, monitoring reports, remedial management measures, credit releases and instrument modification. Although there are four USACE districts in Kentucky (Memphis, Nashville, Huntington, and Louisville), the Louisville District is the Lead District for communication with the sponsor and coordinating with the IRT on issues related to the Instrument, and it has assumed jurisdiction for Section 404 regulatory projects in the Huntington District's region of Kentucky. The individual districts are responsible for specific issues with projects under their jurisdiction (**Figure 2**).

The 2008 Mitigation Rule established "credit" as a transferable unit for handling impacts in mitigation. Credits are now defined per USACE district by functional parameters. In Kentucky, Ecological Integrity Units (EIUs) are mitigation credit units calculated by the Eastern Kentucky Stream Assessment Protocol (EKSAP) used in the Big Sandy River, Upper Licking River, Upper Kentucky River, and Upper Cumberland River service areas, which correspond to major river drainages within the Eastern Kentucky Coalfield Physiographic Region and the Southwest Appalachian, Central Appalachian, and Western Allegheny Plateau Ecoregions within Kentucky. Adjusted Mitigation Units (AMUs) are mitigation credit units calculated by the Kentucky Assessment Protocol (KAP) used in the remaining service areas of the Commonwealth. Adjusted Mitigation Units for wetlands (also called AMUs) are used statewide.

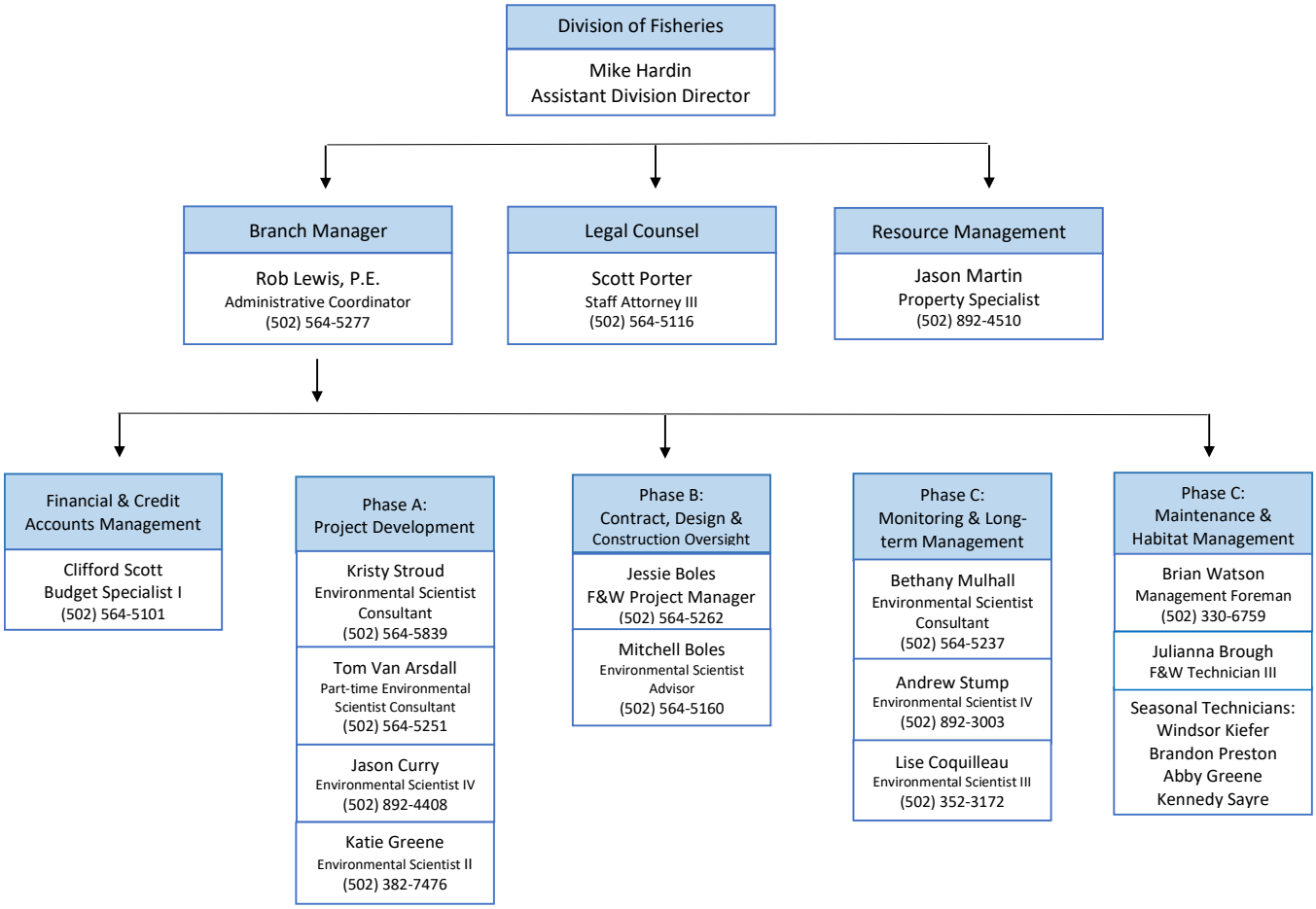
Mitigation projects are implemented on private or public lands and on lands owned or acquired by KDFWR; therefore, the success of the program is in part dependent on cooperation of landowners. Under additional restrictive selection criteria, the program also has the capability of preserving high quality aquatic resources through acquisition of properties with such resources and permanently protecting those areas through legal instruments and management. The Instrument requires that all KDFWR in-lieu-fee projects be permanently protected through conservation easements, deed restrictions, or long-term management plans on public properties such as U.S. Forest Service National Forest lands. For private lands, this involves identifying landowners willing to cooperate with the sponsor to donate or sell a conservation easement or to sell the property in fee simple.

Nineteen projects have been permitted since early 2012 under the USACE Letter of Permission (LOP) process. USACE adds each project to the Instrument as minor modifications (**Appendix B**) The Big Lick Hollow stream restoration project in the Salt River Service Area was permitted in CY24.

FILO Staff and Assignments

Most of FILO workload is allocated functionally into program operation and project stages: Financial and Credit Account Management; Phase A – Project Development; Phase B – Design and Construction; Phase C – Monitoring and Long-Term Management (LTM). However, FILO staff often combine into teams to assist in any phase as needed. In CY24 FILO saw a small turnover in staff with the departure of a few seasonal technicians. Lise Coquilleau was promoted to an Environmental Scientist III and Jessie Boles was also promoted to Project Manager. The flowchart below depicts FILO's current staff structure:

Figure 3: FILO Staff Organization Chart



Program Financial Status

In-lieu fees paid into the program are divided into three categories: Administrative, Reserve and Project. Project funds are maintained with the service area in which the corresponding impacts occur and are readily available for existing and new projects in those corresponding service areas. Administrative and Reserve Funds are programmatic, available statewide, and not service area specific. During CY24, credit sales took in $16M total receipts, representing $11.2M in project funds (**Table 1**). The Salt River Service Area and the Green River Service Area contributed the highest percentage of receipts (34% and 30% respectively) totaling just over $10M. The Upper Cumberland River and the Northern Kentucky Service Areas contributed the second highest percentage of receipts (19% and 8% respectively). The largest category of receipts came from transportation at 41% (**Table 2**). In-lieu-fee payments to FILO from mitigation impacts caused by 404-permitted activities including impact types and the amounts are included in the Service Area sections of the report. Full or partial disclosure of records concerning administrative, reserve or project funds can be requested through the Freedom of Information Act (FOIA).

Table 1: CY24 Service Area Receipts and Project Funds ($)

Service Area	CY2024 Total Receipts	CY2024 portion to Reserve Funds	CY2024 portion to Admin Funds	CY2024 portion to Project Funds	CY2024 Beginning Project Fund Balance S&W	CY2024 Ending Project Fund Balance S&W	CY2024 Service Area % of Receipts
Big Sandy	-	-	-	-	18,762,706	18,762,706	0%
Upper Kentucky	702,000	105,300	105,300	491,400	21,624,988	22,116,388	4%
Lower Kentucky	153,596	23,039	23,039	107,517	9,074,865	9,182,382	1%
Upper Cumberland	3,077,575	461,636	461,636	2,154,302	9,559,748	11,714,050	19%
Lower Cumberland	91,872	13,781	13,781	64,310	15,385,993	15,450,303	1%
Upper Licking	-	-	-	-	8,371,601	8,371,601	0%
Lower Licking	290,741	43,611	43,611	203,519	10,531,773	10,735,292	2%
Salt	5,465,762	819,864	819,864	3,826,033	38,183,619	42,009,653	34%
Green	4,828,902	724,335	724,335	3,380,231	38,119,478	41,499,710	30%
Jackson Purchase	82,635	12,395	12,395	57,845	4,292,525	4,350,370	1%
Northern Kentucky	1,364,424	204,664	204,664	955,097	32,783,596	33,738,693	8%
TOTALS	16,057,507	2,408,626	2,408,626	11,240,255	206,690,892	217,931,147	100%

Table 2: 2024 Receipts by Source

Source	Receipts ($)	% of total
KY Transportation Cabinet	6,611,766	41%
Mining	3,422,466	21%
Development	5,402,703	34%
Municipal	202,800	1%
Other	417,772	3%
Total	**16,057,507**	**100%**

Project Funds

Table 3 shows: 1) project funds received for streams and wetlands in each of the eleven service areas post-transition through CY24; 2) funds currently allocated to "approved" projects; and 3) funds unallocated at the end of the year. The majority of all funds are allocated to projects. FILO does not allocate funds to projects until the projects have been reviewed by and receive support from the IRT. For purposes of understanding the balance of in-lieu-fee funds and project activity it is important to define terms and accounting protocols internal to the state.

"Capital" accounts are established for each in-lieu-fee mitigation project. Property, design, construction, planting, and monitoring costs are paid out of the capital accounts specific to each mitigation project. In the past, the protocol for funding in-lieu-fee mitigation projects did not allow all mitigation project funds to be moved into the respective capital account at the start of a project. Instead, mitigation project funds were moved into capital accounts in stages as projects proceed through various processes and workflows: first, property acquisition funds are moved, then design funds, and lastly construction funds. In the past 2-3 years, FILO has been allowed to dedicate up to the full amount of funds for projects at the start of the project. Regardless of the

state procedures for allocating funds, program staff track the amount of funds necessary to complete all phases of mitigation projects as “allocated” funds.

Allocated funds are defined as the amount of funds which are necessary to complete all phases of a mitigation project or a minimally independent portion of a project. Funds are allocated to mitigation projects soon after the USACE provides the initial support letter for a mitigation project under the LOP permitting process. Allocated funds must be tracked by program staff and may not match the state’s electronic accounting system, *e*Mars, by the same steps. Thus, when viewed as an account snapshot, the program unallocated cash balance *may include* funds that are internally allocated to mitigation projects.

Unallocated funds are defined as funds that are not yet set aside for the completion of mitigation projects. As of December 31, 2024, approximately $191M are allocated to stream projects and roughly $14M of stream project money is un-allocated and includes $5M in over-allocated funds that are covered by the Reserve Fund. Most of the un-allocated funds reside in the Northern Kentucky and Jackson Purchase Service Areas. Roughly $5M is over-allocated in the Upper Kentucky, Lower Cumberland, and Lower Licking Service Areas combined. The Reserve Fund (defined further herein) can be used to cover over-allocation.

Over $17M in project funds has been collected for wetland mitigation since the transition (**Table 3)** with about $14M allocated, mostly in the Salt and Green River Service Areas with $8.6M allocated for projects combined. Approximately $5.1M of wetland funds is unallocated, mostly in the Northern Kentucky and Salt River Service Area. Approximately $2.8M is over-allocated in wetland funds and will be covered by the Reserve Fund.

Table 3: Allocated and Unallocated Project Funds for Stream and Wetland by Service Area ($)

Basin	Stream				Wetland			
	Total Project Funds	Allocated	% of allocated	Unallocated	Project	Allocated	% of allocated	Unallocated
Big Sandy	18,610,565	18,246,057	98%	364,508	152,141	157,544	104%	(5,403)
Upper Kentucky	20,629,474	21,593,364	105%	(963,890)	1,486,913	809,242	54%	677,671
Lower Kentucky	8,538,873	6,730,424	79%	1,808,449	643,508	553,620	86%	89,888
Upper Cumberland	11,122,158	9,494,561	85%	1,627,597	591,893	0	0%	591,893
Lower Cumberland	14,789,361	16,431,914	111%	(1,642,553)	660,943	1,900,000	287%	(1,239,057)
Upper Licking	7,567,838	10,695,305	141%	(3,127,467)	803,764	2,043,402	254%	(1,239,638)
Lower Licking	10,457,993	9,317,500	89%	1,140,492	277,299	0	0%	277,299
Green	37,292,121	36,594,074	98%	698,047	4,207,589	4,585,425	109%	(377,836)
Salt	36,282,810	34,028,923	94%	2,253,887	5,726,842	4,177,791	73%	1,549,051
Jackson Purchase	3,833,821	114,310	3%	3,719,511	516,549	272,166	53%	244,383
Northern Kentucky	31,729,735	28,621,720	90%	3,108,015	2,008,958	335,016	17%	1,673,942
Total	**200,854,748**	**191,868,152**		**14,720,506[a]** **(5,733,910)[b]**	**17,076,399**	**14,834,206**		**5,104,127[a]** **(2,861,935)[b]**

aTotal of Unallocated funds
bTotal of over-allocated funds (in CY24 covered by Reserve funds)

Reserve Fund

Pursuant to the Instrument, a portion of the FILO program fund, called the Reserve Fund is established as additional financial assurances to fund contingency actions, long-term management, and other uses approved by USACE. The Reserve Fund also functions as an endowment and insurance to cover shortfalls in meeting credit obligations, contingency needs, and maintenance costs. It can pay for approved additional mitigation projects, permanent protection activities, minor repair actions and other activities not funded though service area or administrative accounts. Contributions to the Reserve Fund come from a percentage of credit sales, currently set at 15% of credit sales, and a percentage of accumulated interest, currently set at 85% of accumulated interest. In the Instrument, a non-wasting amount of $3M was designated for the Reserve Fund. The balance of funds above the non-wasting limit is referred to as the "Active Reserve". These funds can also be used for remedial actions or additional projects that generate a surplus of credits, or credits in advance of mitigation sales obligations subject to approval by the Corps of Engineers. In some cases, reserve funds utilized for generating credits can be sold to permittees. Credit sales from the reserve fund will refund the reserve fund (rather than produce more service area specific project funds).

The contribution to the Reserve Fund during CY24 from credit sales was $2.1M. The total Reserve Fund at the end of CY24 was $41.8M, which results in an active Reserve Fund of $38.8M when accounting for the $3M non-wasting Reserve Fund required by the Instrument. **Table 4** provides an accounting of the Reserve Fund, including those funds currently projected as needed to cover approved actions in nine service areas due to an over-allocation of project funds. The over-allocation of project funds potentially generates mitigation credits with completed projects 'on the ground' in advance of impacts. This method of "getting ahead" helps to address the 3-year timeframe requirement stated in the 2008 Mitigation Rule or to generate additional mitigation credits that provide insurance against shortfalls that could be incurred with other mitigation projects in the same service area. Additional receipts received prior to initiation of a mitigation project will be used instead of the Reserve Fund, as use of the Reserve Fund would then be unnecessary. These additional receipts will reduce, if not remove, the need to 'cover' these over-allocated service areas with the Reserve Fund. In some cases, project receipts could also be used to refund the Reserve Fund, depending on the timing and scale of receipts and the needs in a service area.

Each year, the program seeds a long-term management and maintenance account with funds from the Reserve Fund to pay for management and minor remedial actions (**Table 4**). This allows the program to be responsive to the USACE and IRT directives in taking necessary remedial or maintenance actions in addition to undertaking scheduled long-term management tasks.

Table 4: CY24 Reserve Fund Activity Balance ($)

Beginning CY2024 Reserve Cash Balance	**43,823,203**	
% of CY2024 stream receipts	2,136,016	Sales and closed/transitioned funds
% of CY2024 wetland receipts	272,610	Sales and closed/transitioned funds
CY2024 Interest Distribution	9,318,291	Interest distribution - 85% Eff 08/01/2022
CY2024 Capital Fund Activity	(558,258)	Reserve funding in Capital Accounts
CY2024 Capital Fund Activity	71,674	Return of unused Reserve Funds
Meadowland Full Delivery	(230,623)	Reserve portion of Full Delivery Payment
Ending CY2024 Reserve Cash Balance	**54,832,913**	
CY2024 ending project fund reserve coverage	(963,890)	Upper Kentucky Stream obligation
CY2024 ending project fund reserve coverage	(1,642,553)	Lower Cumberland Stream obligation
CY2024 ending project fund reserve coverage	(3,127,467)	Upper Licking Stream obligation
CY2024 ending project fund reserve coverage	(5,403)	Big Sandy Wetland obligation
CY2024 ending project fund reserve coverage	(1,239,057)	Lower Cumberland Wetland obligation
CY2024 ending project fund reserve coverage	(377,836)	Green River Wetland obligation
CY2024 ending project fund reserve coverage	(1,239,638)	Upper Licking Wetland obligation
Meadowland Full Delivery	(731,877)	Northern KY FD Contractual Reserve obligation
Big Lick Full Delivery	(699,720)	Salt River FD Contractual Reserve obligation
Ending CY2024 Reserve obligations	**(10,027,442)**	*Subject to USACE Approval
Reserve Balance after obligations	44,805,471	
Non-Wasting Reserve	3,000,000	
Ending CY2024 Active Reserve Balance	**41,805,471**	

Administrative Fund

The Administrative Fund is used for expenses associated with activities to operate the program and to identify new projects. Such activities include feasibility studies, consultant contracts for mitigation site identification and early phase project development, outreach and property development, staff salaries, equipment, and additional indirect expenses such as travel and training. The Administrative Fund balance entering CY24 was $15.2M. During CY24, over $2.1M was added to the Administrative Fund from 15% of credit sales. **Table 5** details the use of the Administrative Fund during CY24, leaving a year-end balance of $14.8M.

Table 5: CY24 Administrative Fund Activity and Balance ($)

Beginning CY2024 Administrative Cash Balan	**15,205,942**	
% of CY2024 stream receipts	2,136,016	Credit sales and closed/transitioned funds
% of CY2024 wetland receipts	272,610	Credit sales and closed/transitioned funds
CY2024 Interest Distribution	1,644,404	Interest distribution - 15%
CY2024 operating expenditures	(1,823,046)	Payroll and operations cost
CY2024 Capital Fund Activity	(445,000)	Administrative Funded Capital Accounts
CY2024 Capital Fund Activity	38,357	Return of unused budgeted Admin Funds
CY2024 Meadowland Full Delivery	(345,934)	Admin portion of Full Delivery Payment
Ending CY2024 Administrative Cash Balance	**16,683,349**	
Meadowland Full Delivery (Northern Kentucky)	1,097,816	Northern KY FD Contractual Administrative obligation
Big Lick Full Delivery (Salt River)	699,720	Salt River FD Contractual Administrative obligation
Total FD Administrative Fund Obligation	**1,797,536**	
Ending CY2024 Active Administrative Balance	**14,885,813**	

Mitigation of Impacts

Prior to the 2008 Mitigation Rule fully taking effect with the Instrument in early 2012, it was not possible to relate mitigation to impacts caused by 404-permitted activities because in-lieu-fee payments to FILO had little documentation regarding the quantity, quality, and flow regime of stream impacts. This was especially true during the first few years of the in-lieu-fee program. It was assumed that impacts and mitigation occurred on similar stream flow types, resulting in similar linear feet affected. This information (or lack thereof) is not 'lost' information but a result of inconsistencies in permittee and regulatory tracking unrelated to FILO program actions. Thus, the pre-transition programmatic success was based on cost per linear foot that was established by the USACE as a "base-rate" for steam and wetland impacts. That was then used in a formula by the USACE during the permitting process to determine a final in-lieu-fee payment amount. The FILO program did not always have access to permit applicant information regarding impact types and amounts. The available data could track only the amount of in-lieu-fees received and the timing of the allocation of those funds to mitigation projects. Since 2012, with the implementation of the Instrument and the conversion of unallocated funds to credits, it is possible to compare impacts (Advance Credits sold by FILO) to mitigation (Advance Credits fulfilled by FILO) for projects that began (approved by the IRT) post-transition. This report contains projects and actions pre- and post-transition, so not all projects and actions relate directly to 2008 Mitigation Rule era projects, credits, and program compliance.

Project Statistics and Status

The IRT has approved conceptual plans for 165 projects over the FILO program's 22-year history (2002-2024). Of those, 104 projects have been completed or are in various stages of development (Refer to the **Service Area Sections** for project specific details). 66 projects were not continued for various reasons, commonly including but not limited to property issues such mineral rights severance or other title concerns, high cost, and landowner risk concerns. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding.

In 2024, a formal request was submitted to Louisville USACE regarding watershed protection credit (WPC) for several project sites where the executed SPI covers entire watersheds of mitigation reaches. This type of credit has been used on several sites, but was not consistently documented on several past projects. For the past several years, the FILO annual report has included accounting for projects where WPC (previously abbreviated as WPS) needed to be added to several projects, but no explicit formal request was made. This report includes those the same way as before, as individual projects, shown as columns in summary tables rather than absorbed into their corresponding projects. Those projects are being managed as if the WPC is implemented, but at the end of 2024 no official guidance is provided. In the future there may be similar requests, as an effort to provide consistency across the program and fully realize the credit potential of FILO mitigation sites.

In this report, project status narratives are organized by service area and then topically within each service area, with each service area section being similarly ordered. The Service Area Sections will contain all the information that pertain to each specific project or the service area in general except for some appendices which contain supplemental documents, data and analysis that support summaries and narratives throughout the report. The intent is for the Service Area Sections and Appendices to be semi-independent from the rest of the report. For the Service Area Sections to be utilized in this manner, some narrative and contextual information is presented redundantly. Throughout the project narratives, the term 'FILO' is used generally to include FILO staff, contracted consultants, and contractors. Maps are included for each service area and show approximate project locations and color code by status as labeled. For example, a status of "Approved" on the maps indicates the project has received IRT CP approval while a status of "LTM" indicates a project has been formally released from active monitoring to the long-term management (LTM) phase. Project narratives include information on general maintenance, efforts on the initial physical and biological improvements (IPBI), and LTM activities.

Originally LTM was envisioned to be a phase of the FILO program that begins after the active monitoring is completed and credits are released. However, management activities and expectations have evolved since 2012. Thus, the manner in which the 2008 Mitigation Rule (2008 MR) emphasizes IPBI completion, LTM begins with property acquisition, which for FILO projects is completed very early in the project process, prior to permit applications. In this way LTM became a phase that involved a wide scope of compliance objectives that were divided into the following categories: easement assessments, general maintenance, and IPBI activities, initiated with the conception of projects.

LTM activities for projects that are released from active success monitoring usually consist of conducting easement assessments to make sure site protection instruments are being honored on projects where construction and monitoring for credit release is complete or near complete. Each year, program staff visit nearly all projects that have been released from active monitoring to determine if there are any encroachments, invasive species that need to be removed, signage requirements, repairs, etc. These encroachments are typically few, but when present, they are reported to USACE and a resolution is determined for implementation, usually resulting in maintenance activities. These activities are not necessarily required by formal regulatory action but address site resilience and risk management over the long-term, as inferred from the

Instrument. Following the description of projects that are in the “Active Project Status” section (i.e., the project is approved, in the design/permit phase, or is in active monitoring) of each service area there is a section describing LTM activities, if they exist, with a table showing easement encroachments and stability. These activities are summarized in **Appendix C**.

General maintenance can be part of a prescribed mitigation plan or a formal adaptive management plan (AMP), a reaction to annual monitoring observations and results, or could be a pro-active effort to supplement project effectiveness. Maintenance activities include but are not limited to invasive species removal, native tree and seed plantings, beaver dam/tree removal, bank repairs, etc. Each service area section contains an “Active Project Status” and “LTM Project Status” section that these maintenance activities may occur in. General maintenance that occurs during the “active” status is described extensively in narratives and tables. The activities that may occur in the LTM phase are described in project narratives in each Service Area Section.

IPBI is a compliance category created in the 2008 MR as a timing goal for the implementation of mitigation projects for in-lieu-fee programs. For FILO projects, IPBI activities occur as soon as possible after a site protection instrument is under contract; specifically, they should be completed by the third full growing season (aka, the ‘3-year-rule’) after advance credits in that service area are secured by a permittee, unless the district engineer determines that more or less time is needed to plan and implement an in-lieu-fee project. Historically for FILO, this and all compliance actions and reporting have been organized by year, rather than by day of sale, such that credit sales within a year are cumulated and the following three years are the target for implementation of projects, including IPBI.

Prior to 2024, actions available for the FILO program that qualified as IPBI were not well defined and were significantly limited due to restrictions associated with permit processing and timing, such as archeology, cultural and biological regulatory concerns, and several other necessary actions or authorizations. However, limiting and controlling access by vehicles and livestock and treatment of invasive vegetation are IPBI actions that have a very well-known and immediate positive effect on the physical and biological landscape, especially riparian and wetland areas. IPBI efforts are documented in this report similarly to the way general maintenance in the “Active Project Status” is described. Treatment area maps are also included since IPBI is a compliance objective and often has a spatial component to help document and quantify the efforts. In each service area section, a compliance summary table and histogram figure show a comparison of credit sales to project values by year and by milestone, some of which are associated with IPBI activities to show how that relates to meeting the 3-year-rule. Appendix G consists of an expanded form of the same table and figures with supporting data combined for the whole program, by service area. At the end of Appendix G there is a summary of the service rea histograms for 2024 for stream credits and for wetland credits.

In September 2024, the Louisville Corps District provided the FILO program with written guidance for activities that qualify for IPBI. This written guidance appears to be an excerpt from a larger IRT effort (meeting and/or discussion). With this directive, FILO staff reassessed past IPBI activities and updated project values accordingly. This is apparent in IPBI information provided in this annual report, most notably in the data and histogram for 2023 shown in each

service area section and Appendix G where project credits associated with IPBI for 2023 are shown as before and after the 2024 definition. 2024 data and 2025 projections utilize only the 2024 IPBI definition.

To help illustrate compliance and project progress, each service area section of this report includes a "Compliance Summary Table". The Compliance Summary table shows a summary of credit processing by the following milestones:

i. CP/Prospectus Approved
ii. IPBI
    a. (Post 2024 definition from Louisville USACE, includes SPI execution)
iii. Permit Authorization
    a. (404 complete, which infers 401 and Instrument Mod also complete)
iv. Construction Commenced

As stated in the 2008 MR, the first metric for compliance and progress with regard to timing is the implementation of IPBI. However, while implemented IPBI does not affect credit release timing, it does represent the credit value of projects in which the Program has a vested programmatic and financial interest through several significant *internal* programmatic milestones, (listed below for context, but not used for compliance summaries in this report). At a minimum, those completed milestones include:

i. IRT conceptual plan or prospectus approval, an
ii. executed Site Protection Instrument (SPI, as deed restrictions, conservation easement, federal land management plan, or an executed contract in place), and
iii. initiation of LTM activities including but not limited to:
    a. permanent livestock removal and exclusion,
    b. construction of public access, staging areas, and material staging,
    c. construction of access control to prevent recreational and agricultural uses, such as fencing and gates,
    d. removal of invasive vegetation,
    e. planting of native vegetation, and
    f. other activities as appropriate and allowed.

Some limitations apply, such as those that require National Historic Preservation Act (NHPA) or Endangered Species Act (ESA) concurrence prior to the activity. For example, in Kentucky, tree planting has not been allowed on FILO project sites without State Historic Preservation Office concurrence for NHPA requirements, and all of Kentucky is considered habitat for imperiled bats, so tree removal is limited to certain times of year and requires prior concurrence from USFWS and USACE for ESA requirements.

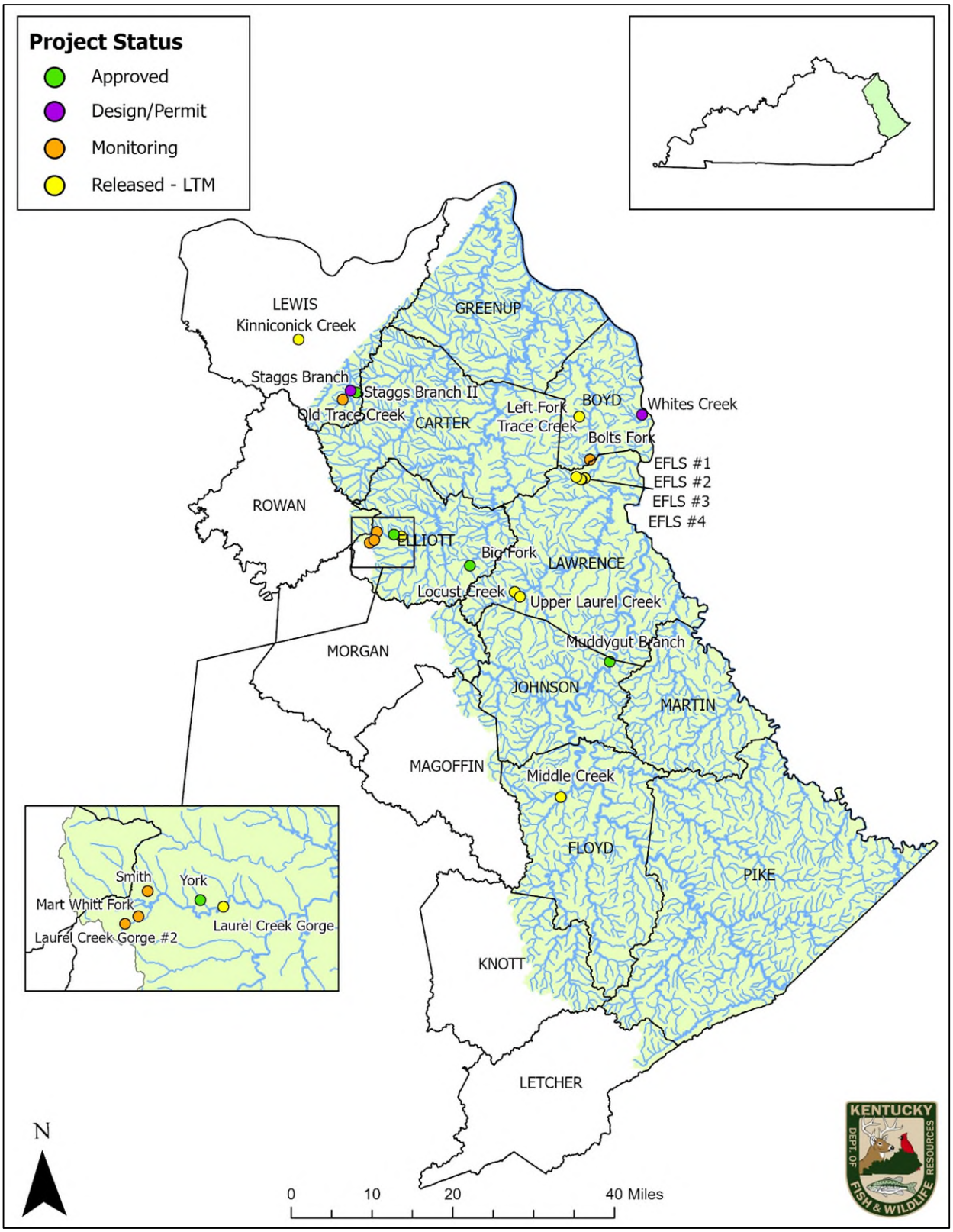
Following each compliance summary table in each service area section is a figure of histograms as a visual, color-coded representation of total project credit values, by milestone, for the previous year (2023), the current year (2024) and projected for next year (2025).

In each Compliance Summary table, credits are the cumulative total of all projects in the service area sorted by year to be applied to credit sales from those years. Released credits are included in

all categories such that the table categories offer a snapshot of ‘done-ness’ as-of the end of CY24. To consider released credits, **Appendix E** is a program-wide summary. The raw analysis for all service area project progress (“compliance summary”) tables is **Appendix G.** Information in **Appendix G** is sorted and arranged by service area, by credit sales years, and by the order in which individual projects correspond to those credit sales. There is also color coding in those tables to indicate major milestones, such as whether IPBI activities have occurred on those sites or not. **Appendix D, F** and **G** are each useful to see which credits, projects, and schedules apply to the values in the summaries throughout this report.

Big Sandy River Service Area

Figure 4: Project Status in the Big Sandy River Service Area 2024



There are twelve active projects in the Big Sandy service area and ten in the LTM phase. These projects fall within the USACE Louisville District and EKSAP region, which utilizes the EIU credit system (**Figure 4)** The Instrument, consistent with the 2008 Mitigation Rule, for in-lieu-fee programs allowed an allotment of credits available per service area for sale to permittees in advance of mitigation activities. The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in the Big Sandy Service Area along with 100 advanced wetland credits (**Table 7**). The cost per credit for stream and wetland did not change in this service area during CY24 (**Table 8**).

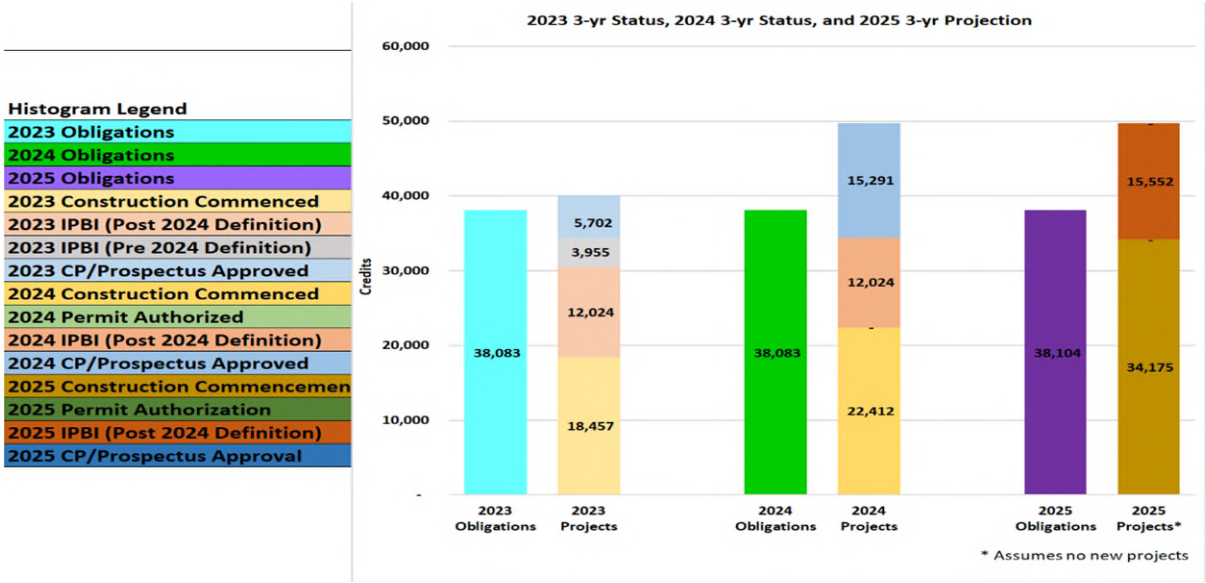
Table 6 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 6 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 5 shows the cumulative credit values of project by major milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 5 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

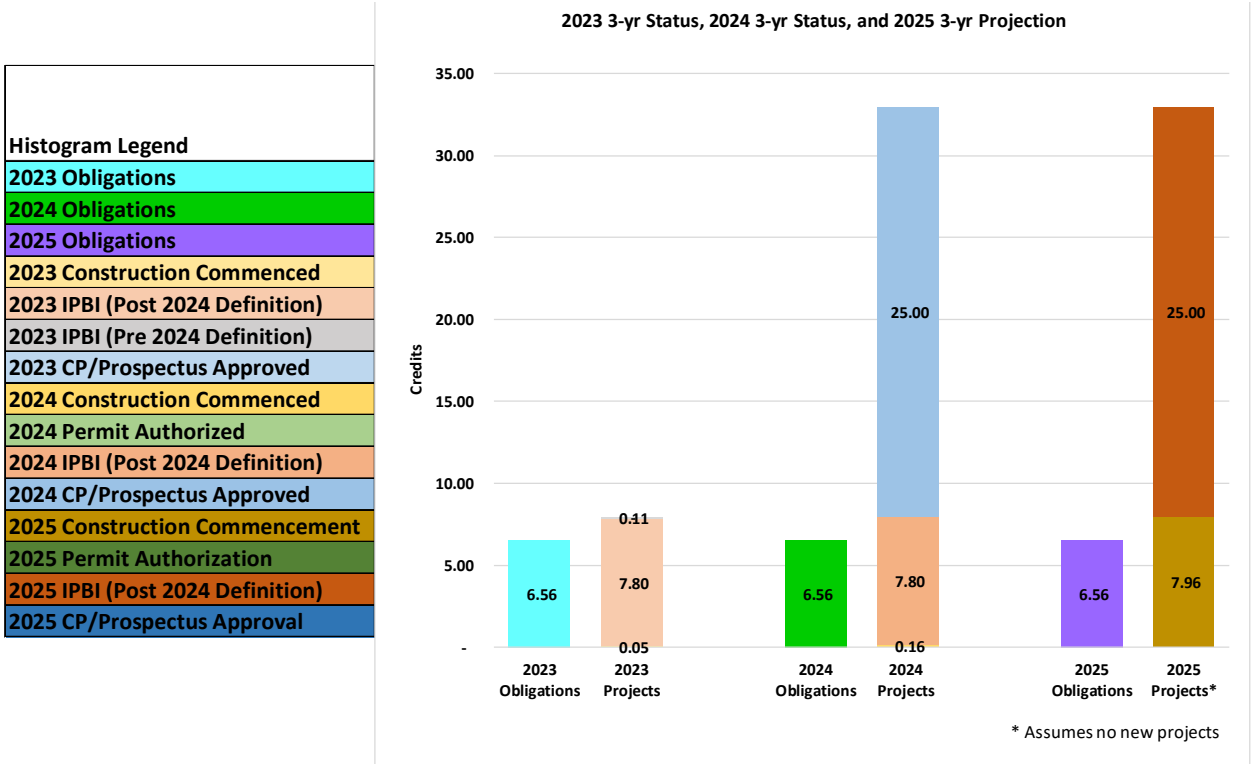
Table 6: Big Sandy Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects (credits)	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/Prospectus Approved
Transition	23,103.00	22,807.00	22,411.57	22,411.57	22,807.00	22,807.00
2012	2,376.28	2,376.28	-	-	2,376.28	2,376.28
2013	5,707.60	5,707.60	-	-	5,707.60	5,707.60
2014	3,535.58	3,535.58	-	-	3,535.58	3,535.58
2015	2,599.45	2,599.45	-	-	9.11	2,599.45
2016	176.60	176.60	-	-	-	176.60
2017	138.83	138.83	-	-	-	138.83
2017	25.00	25.00	-	-	-	25.00
2018	-	-	-	-	-	-
2018	421.00	421.00	-	-	-	421.00
2019	-	-	-	-	-	-
2020	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	-	-	-	-	-	-
2022	21.00	21.00	-	-	-	21.00
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	-	-	-	-	-	-
Future		11,918.23	-	-	-	11,918.23
Total	38,104.34	49,726.57	22,411.57	22,411.57	34,435.57	49,726.57

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects (credits)	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/Prospectus Approved
Transition	3.550	3.550	0.16	0.16	3.55	3.55
2012	2.410	2.410	-	-	2.41	2.41
2013	0.024	0.024	-	-	0.02	0.02
2014	0.577	0.577	-	-	0.58	0.58
2015	-	-	-	-	-	-
2016	-	-	-	-	-	-
2017	-	-	-	-	-	-
2017	-	-	-	-	-	-
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	-	-	-	-	-	-
2020	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	-	-	-	-	-	-
2022	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	-	-	-	-	-	-
Future		26.399	-	-	1.40	26.40
Total	6.561	32.960	0.16	0.16	7.96	32.96

Figure 5: Big Sandy comparison of credit sales to project credit values, organized by year and by major milestones.





Credit Costs, Balances and CY24 Activity

Table 7: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream EIU Regions	Big Sandy
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	204,353.66
CY2024 Credits Sold	-
CY2024 Released Credits	9,281.00
CY2024 Ending Advance Stream EIU Balance	213,634.66

WETLAND AMUs	Big Sandy
Advance Credit Allocation	100.000
CY2024 Beginning Credit Balance	93.439
CY2024 Credits Sold	-
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	93.439

Table 8: Credit Cost in the Big Sandy Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Big Sandy (EIU)	919	919	78,000	78,000

In November 2014, credit sales were suspended in the Big Sandy River Service Area because of: 1) the difficulty in finding mitigation projects meeting criteria (i.e., sites without mineral rights, property title or owner issues, or water quality issues); 2) the 3-year timeframe for initiating mitigation projects from the time fees were received was not going to be met due to the paucity of mitigation sites without mineral issues; and 3) several projects on large tracts of land involving thousands of potential mitigation credits that would have covered the obligation could not be developed further because of severed oil and gas interests. Considering these three factors, it was determined the pace of identifying successful projects in the Big Sandy River Service Area would not likely keep up with the pace of sales. Credit sales had not been resumed by the end of CY24.

FILO staff continue their efforts to locate potential project sites in the Big Sandy Service Area through various landowner contacts, realtors, and consultants. In CY24, FILO closed on the Muddygut property and continued working towards resolutions on the Big Fork Wetland project site that is still in the early stages of the IRT process for approval. The IRT conducted a site visit to Big Fork in November 2023. If approved, and if a favorable determination can be made regarding the mineral, oil, and gas property title, this site has the potential to meet triple the cumulative total of all past wetland credit sales obligations for the Big Sandy Service Area. Wetlands are relatively rare in the Big Sandy Service Area, so it may be necessary to make special considerations regarding property title if the site is considered high value. The program is looking forward to the IRT response and ideas regarding proceeding appropriately.

The Active Project Status section below is the list of projects in the service area that have been designated LRL numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. *Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding* (**Table 13**). Please note that in general, "high cost" alone may not eliminate a project from consideration except when that "high cost" is related to "asking price" for executing the SPI and is higher than a 3rd party fair market appraisal. The program has means to absorb and manage relatively high mitigation costs such that unless exorbitant, higher than average lump sum or unit costs for a single project should not negatively limit the mitigation obligation, nor the ecological potential of a site. Those means include but are not limited to increasing mitigation fee rates within the corresponding service area, economies of scale for large projects, and ability to use long-term averages for project costs (i.e., low-cost projects offset, but averaging with, high-cost projects).

Active Project Status

Big Fork Stream and Wetland, Elliott County: In the early stages of development, this project was presented to the IRT in Oct. 2023. In 2024, FILO is currently addressing the LOP comments to resolve a path forward concerning mineral severances. Currently, the landowners are actively working to obtain the mineral rights back to the property. Chosen for its potential to preserve and enhance high quality wetlands, it is expected to generate 19 AMU wetland credits and 9,500 EIU stream credits.

Muddygut Branch, Johnson County: FILO submitted the CP in 2022 and it was approved by the IRT in 2023. This project is expected to generate over 5,000 EIU stream credits. In 2024, FILO completed the boundary survey and property acquisition.

Bolts Fork, Boyd County: FILO submitted the Year 5 monitoring report in December 2018. Invasive species management occurred throughout the monitoring period and efforts to repair a portion of the streambank were completed in 2021 via a design/build contract. Bank stabilization techniques including rock toe repair were implemented with temporary seeding and straw following. FILO staff installed permanent vegetation (live stakes, bare root trees, container trees, and native seed) in early 2022. A report documenting this effort was submitted in December 2022 and 2023. FILO requested releasing the project from monitoring with the IRT. We are awaiting a letter granting final monitoring release of the project.

Laurel Creek Gorge #2 (Green-Johnson tracts), Elliott County: Properties associated with this project are added to the Ed Mabry-Laurel Gorge WMA, which itself was a high-quality preservation site originally acquired by the program for mitigation. These properties were combined into one design-build project along with other properties (Smith Property and Mart Whitt Fork), also purchased adjacent to the WMA. In 2022, FILO finished construction and planted the project with native vegetation. In 2024, FILO collected baseline information for the subsequent monitoring years.

Mart Whitt Fork, Elliott County: Property associated with this project were added to the Ed Mabry-Laurel Gorge WMA, which itself was a high-quality preservation site originally acquired by the program for mitigation. It has been combined with other properties (Smith Property and Laurel Creek Gorge #2) purchased adjacent to the WMA into one design-build project. In 2022, FILO finished constructing and planting the project. In 2024, FILO collected baseline information for the subsequent monitoring years.

Old Trace Creek, Lewis County: With IRT CP Approval in 2013, KDFWR purchased the property in March 2014. The design-build contract started in 2015, and construction began in 2017. Construction and planting were completed in early 2018, commencing the first year of monitoring. FILO submitted the Year 5 monitoring report in December 2022. In 2023, FILO staff completed maintenance treatment of invasive species using backpack sprayers. There are some stability deficiencies on Old Trace, the largest project reach, which need further investigation, but most of the site reaches appear successful. A compliance visit was held in early 2024 and determined that majority of the tributaries were functioning with some minor repairs needed, which have been completed. FILO plans to review the site, create and submit an adaptive management plan to address deficiencies on Old Trace Creek proper in 2025.

Table 9: Old Trace Creek 2024 Maintenance Activities

Date	Staff	Action	Amount	Description
12/3/2024	JB, BW, KS, JL, BM, AG	Tree removal	4 tribs	Removed trees from the streams that were causing erosion and organic material build which limits flow of water for downstream
12/4/2024	JB, BW, KS, JL, AG	Stream restoration	2 areas	Reinforced the stream edges with rocks from the stream then dug out the center to promote flow

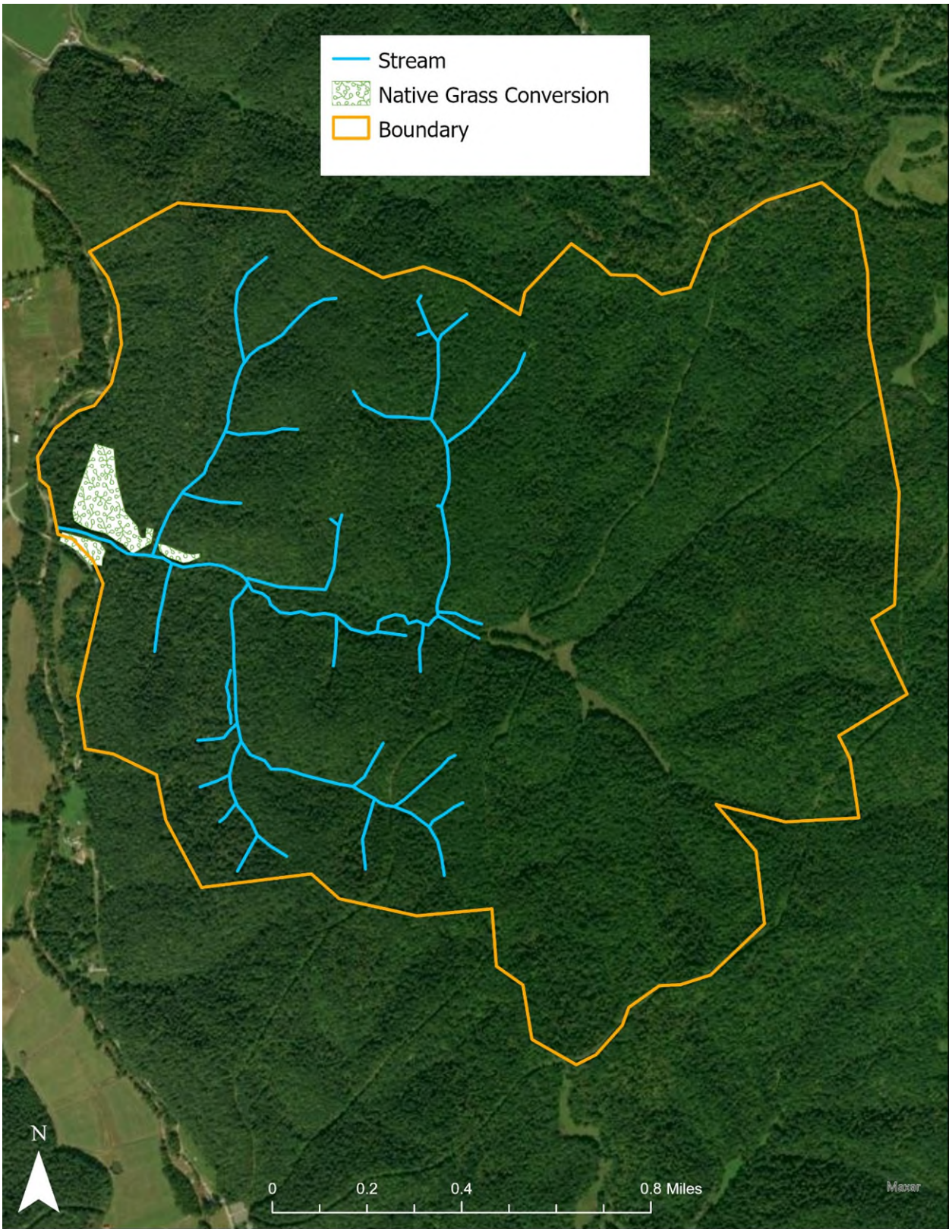
Smith Property, Elliott County: Property associated with this project added to the Ed Mabry-Laurel Gorge WMA, which itself was a high-quality preservation site originally acquired by the program for mitigation. It has been combined with other properties (Mart Whitt Fork and Laurel Creek Gorge #2) purchased adjacent to the WMA into one design-build project. In 2022, FILO finished construction and planted the site with native vegetation. In 2024, FILO collected baseline information for the subsequent monitoring years.

Staggs Branch, Lewis County: In 2020, FILO purchased the 440-acre property. In 2021, FILO submitted a Phase 1 Archaeology Report and Cultural Resources Report for Section 106 of the National Historic Preservation Act and conducted the Preliminary Design/JD and Assessment Verification Meetings. In 2022, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and conducted a follow-up Preliminary Design Review Meeting. In 2023, FILO revised and resubmitted the Biological Assessment, received Section 106 concurrence and an IRT support letter from a second Preliminary Design Review Meeting. The draft Mitigation Plan and KDOW Pre-Filing Meeting request were submitted in 2024. Also in 2024, native grass conversion for IPBI compliance commenced. The conversion will be completed by fall 2025. The table and figure below depict the native grass plot details. FILO intends to submit for and receive the 401 Water Quality Certification and 404 Department of Army Permit in 2025.

Table 10: Staggs Branch 2024 IPBI Activities

Date	Staff	Action	Amount	Description
7/1/2024	BW	Native grass conversion	5.475 gallons	Prepped area for native grass conversion by spraying 3% glyphosate with a tractor sprayer.
Gallons** represents the amount of diluted chemicals used to prep area for native grass planting.				

Figure 6: Staggs Branch 2024 IPBI Treatment Area



Staggs Branch II, Lewis County: Approved in 2019, the property consists of two separate tracts of land with separate owners. One property owner declined to sell the property or allow an easement and as such is listed as terminated in table 13. The second landowner accepted the offer, this property was absorbed into Staggs Branch project. This was summarized and condensed in the 2024 Staggs Branch Mitigation Plan.

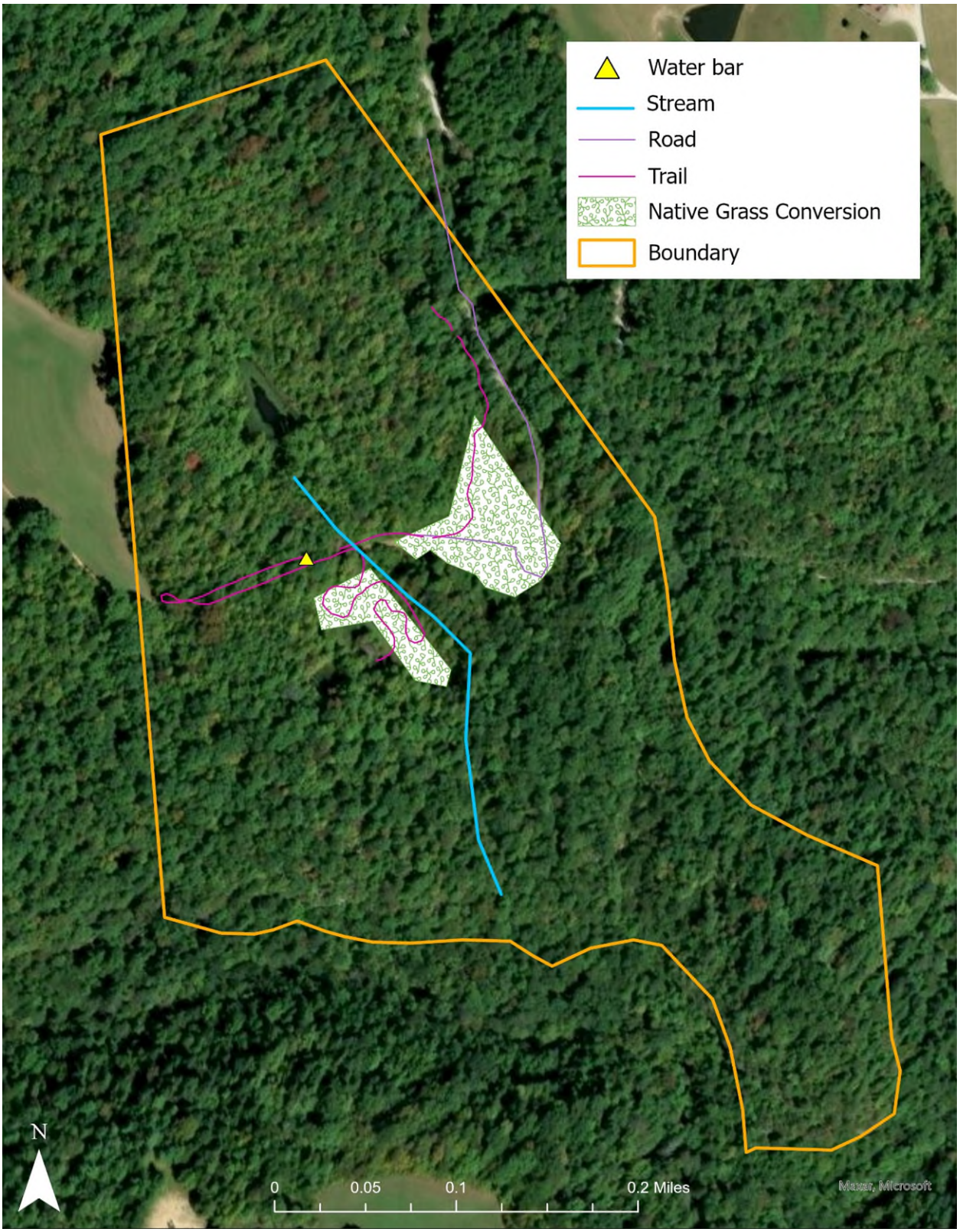
Whites Creek, Boyd County: In 2016, the Floodplain Permit was received, and the Mitigation Plan was completed in 2017. In 2018, FILO received the 401 Water Quality Certification. In 2019 and 2020, FILO worked towards finalizing the easement. In 2021, FILO finalized the easement and received a 404 Department of Army Permit. In 2022 and 2023, FILO worked on design and bid documents. In 2024, FILO advertised the project for construction bidding and expects construction to begin in 2025.

York Property, Elliott County: FILO acquired the property in 2021. The 55 additional acres adjoins the southeast portion of Ed Mabry-Laurel Gorge WMA and will help provide a new, safer public access point to the remote WMA. In 2022 and 2023, FILO conducted surveys for the Biological Assessment for Section 7 of the Endangered Species Act and the Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act. Native grass conversion for IPBI compliance commenced in 2024 and water bars were also marked for construction in 2025. The native grass conversion efforts were started in the summer and will be completed by fall 2025. The table and figure below describe and show the locations of these activities.

Table 11: York Property 2024 IPBI Activities

Date	Staff	Action	Amount	Description
7/1/2024	AG, KS	Water bars and trail mapping	N/A	Mapped trails and marked where water bars would be built.
7/3/2024	BW	Native grass conversion	32.33 gallons	Prepped area for native grass conversion by spraying 3% glyphosate with a tractor sprayer.
Gallons** represents the amount of diluted chemicals used to prep area for native grass planting.				

Figure 7: York Property 2024 IPBI Treatment Area



LTM Project Status

There are several projects in the Big Sandy Service Area that have progressed beyond what we consider "active," to Long-Term Monitoring (LTM). As mentioned in the programmatic sections of this report, LTM was originally envisioned as what happens *only after* mitigation projects are built and released from extensive annual monitoring requirements that inform credit releases. That function has since evolved to include site management that begins in conjunction with execution of SPI, well ahead of (and continuing through) mitigation design, permitting, construction and monitoring. As such, LTM activities may also cover IPBI activities, and FILO covers much of this with the same staff (and consultants/contractors when applicable).

Because mitigation is generally expected to be stable and/or resilient as defined by the project goals and objectives in the mitigation plan, the intent (and hope) is that minimal action is necessary for LTM. FILO staff visit each site in the LTM Phase at least once per year to review, observe, and report if actions are necessary. Staff also reach out to private landowners for projects in conservation easements on private lands to maintain rapport with existing landowners, as well as establish good relationships with new landowners to educate them on the conservation easement requirements and (when interested) the intrinsic value of healthy aquatic habitat and mitigation needs.

Some repairs are needed at Left Fork Trace Creek (Boyd Co) and Middle Creek Battlefield (Floyd Co). These deficiencies will be addressed in 2025. The table below describes the LTM sites that were visited in 2024.

Table 12: 2024 LTM Actions in the Big Sandy River Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Big Sandy	East Fork Little Sandy #1	1/25/2023	Good	Good	Project visited and no actions needed
Big Sandy	East Fork Little Sandy #2	1/25/2023	Good	Good	Project visited and no actions needed
Big Sandy	East Fork Little Sandy #3	1/25/2023	Good	Good	Project visited and no actions needed
Big Sandy	East Fork Little Sandy #4	1/25/2023	Good	Good	Project visited and no actions needed
Big Sandy	Kinniconick	2/1/2023	Good	Action Completed	Area of concern identified and addressed in 2023
Big Sandy	Left Fork Trace	1/25/2023	Good	Action Required	Small repair needed (<300LF) to be completed by contractor in mid 2024
Big Sandy	Locust	1/25/2023	Good	Good	
Big Sandy	Middle Creek Battlefield	8/15/2023	Good	Action Required	Large scale bank repair effort needed. To be completed by contractor in mid
Big Sandy	Upper Laurel	1/25/2023	Good	Good	

Table 13: Project Status in the Big Sandy Service Area

Count	Project	Status	County	USACE Distrct	404 Permit #
1	Muddygut	CP Approved	Johnson	Louisville	LRL-2022-1025
2	Staggs Br II	CP Approved	Lewis	Louisville	LRL-2019-00436
3	York	CP Approved	Elliott	Louisville	LRL-2013-1012-pgj
4	Mart Whitt II	CP Approved	Elliott	Louisville	LRL-2020-00578-pgj
5	Staggs Br	Design/Permit	Lewis	Louisville	LRL-2016-153-pgj
6	Whites Cr	Design/Permit	Boyd	Louisville	LRL-2012-634-pgj
7	Laurel Cr Gorge #2	Monitoring	Elliott	Louisville	LRL-2012-478-pgj
8	Mart Whitt Fk	Monitoring	Elliott	Louisville	LRL-2013-598-pgj
9	Smith	Monitoring	Elliott	Louisville	LRL-2013-1013-pgj
10	Bolts Fk	Final Release Pending	Boyd	Louisville	LRL-2010-698-pgj
11	Old Trace Cr	Monitoring - YR 7	Lewis	Louisville	LRL-2013-336-pgj
12	EFLS #1	Released - Long Term Management	Lawrence	Louisville	200401120
13	EFLS #2	Released - Long Term Management	Lawrence	Louisville	LRL-2009-332-pgj
14	EFLS #3	Released - Long Term Management	Lawrence	Louisville	LRL-2008-1082-pgj
15	EFLS #4	Released - Long Term Management	Lawrence	Louisville	LRL-2009-123-pgj
16	Kinniconnick Cr	Released - Long Term Management	Lewis	Louisville	LRL-2007-409-pgj
17	Laurel Cr Gorge	Released - Long Term Management	Elliott	Louisville	-
18	Left Fk Trace Cr	Released - Long Term Management	Boyd	Louisville	2006-00160
19	Locust Cr	Released - Long Term Management	Lawrence	Louisville	LRL-2008-1249-pgj
20	Middle Cr	Released - Long Term Management	Floyd	Louisville	LRL-2006-1256-pgj
21	Upper Laurel Cr	Released - Long Term Management	Lawrence	Louisville	200500901
1	Brushy Cr	Approved - Terminated	Greenup	Louisville	200400931
2	EFLS #5	Approved - Terminated	Lawrence	Louisville	LRL-2011-456-pgj
3	Ison Creek	Approved - Terminated	Elliott	Louisville	LRL-2013-222-pgj
4	Laurel Cr Tributary	Approved - Terminated	Elliott	Louisville	-
5	Laurel Tribs - Rowe Flats	Approved - Terminated	Elliott	Louisville	LRL-2013-770-pgj
6	Schultz Creek	Approved - Terminated	Greenup	Louisville	2009-806
7	Lovelace Fork	Approved - Terminated	Elliott	Louisville	LRL-2015-1022-pgj
8	Laurel Gorge - Howard Tract	Approved - Terminated	Elliott	Louisville	LRL-2014-276-pgj
9	White Oak Creek	Approved - Terminated	Greenup	Louisville	LRL-2012-787-pgj
10	Hitchins	Approved - Terminated	Carter	Louisville	LRL-2016-374-pgj
11	Barrett Creek	Approved - Terminated	Carter	Louisville	LRL-2012-635
12	Clifty Cr	Approved - Terminated	Elliott	Louisville	LRL-2013-867-pgj
13	Ben Willim Branch	Approved - Terminated	Lewis	Louisville	-
14	Keys Creek	Approved - Terminated	Boyd	Louisville	-
15	Pigeon Roost	Approved - Terminated	Boyd	Louisville	LRL-2012-26-pgj
16	Flutylick Branch	Approved - Terminated	Martin	Louisville	-
17	Buffalo Cr	Approved - Terminated	Johnson	Louisville	-
18	Cat Fork	Approved - Terminated	Lawrence	Louisville	LRL-2012-132-pgj
19	Stan Br	Approved - Terminated	Carter	Louisville	LRL-2016-374-pgj
20	Pleas Creek	Approved - Terminated	Lawrence	Louisville	LRL-2019-01050-pgj
21	Staggs Br II	Approved - Terminated	Lewis	Louisville	LRL-2019-00436
22	Grassy Cr	Approved - Terminated	Carter	Louisville	LRL-2019-00559-pgj

Table 13 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit, where the bulk of design and permitting processes occur. **Table 14**

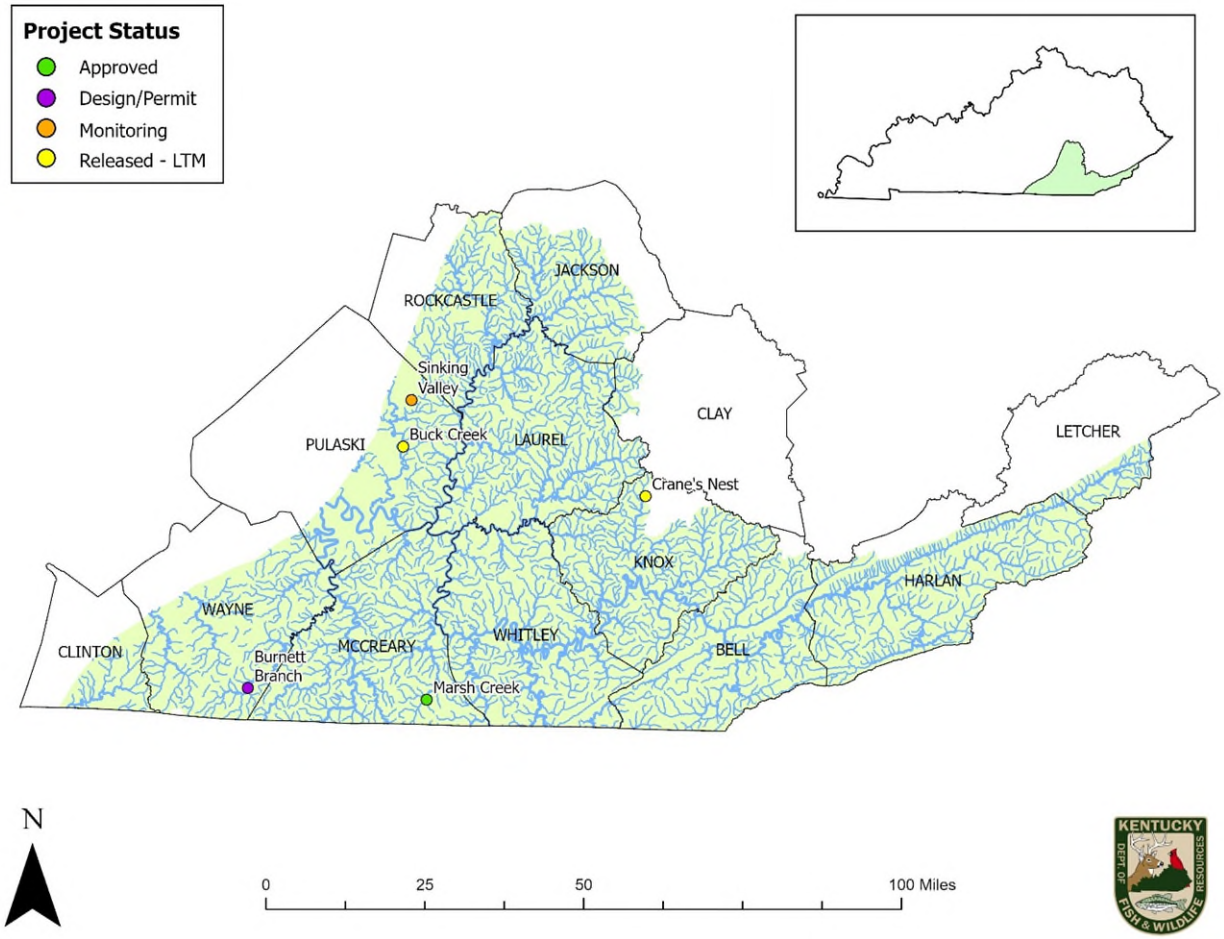
shows a subset of projects that are in this stage of development. For the Big Sandy Service Area, The Staggs Branch, Muddygut and Whites Creek projects will provide enough credits to meet sales obligations, and the York project is low priority because it is a relatively small tract of land that was acquired and added to the Mabry WMA project(s) with only one small ephemeral/intermittent drainage that would be more efficient to group with another project under development in the area, much like the previous group added to Mabry WMA.

Table 14: Project Status by Permit Milestone between SPI and Construction.

Project	Staggs Branch 1	Muddygut Branch	York	Whites Creek
KDFWR Service Area	Big Sandy	Big Sandy	Big Sandy	Big Sandy
USACE LRL#/LRN#/MVM#	LRL-2016-00153	LRL-2022-01025	LRL-2013-1012	LRL-2012-634.pgj
Section 7 Submittal	10/2/2023	Summer 2025	Fall 2024	4/25/2016
Section 7 Concurrence	7/30/2024	Fall 2025	Winter 2025	7/21/2017
Section 106 Submittal	10/22/2021	Summer 2025	9/25/2024	3/30/2015
Section 106 Concurrence	1/25/2023	Fall 2025	Fall 2024	10/22/2015
IRT Design Review Date	5/13/2021 9/16/2022	Summer 2025	tbd	NA
JD Site Visit	5/14/2021	Summer 2025	tbd	NA
Design Review and PJD comments received	6/23/2021 5/18/2023	Summer 2025	tbd	NA
Draft MP Submittal	9/18/2024	Fall 2025	tbd	10/20/2017
Submit Pre-Filing Request	9/18/2024	Fall 2025	tbd	NA
401 Application Date	Winter 2025	Winter 2026	tbd	6/28/2016
401 FP Permit Received	Spring 2025	Spring 2026	tbd	7/8/2016
401 WQC Permit Received	Spring 2025	Spring 2026	tbd	3/5/2018
404 Application Date	Winter 2025	Winter 2026	tbd	7/2/2021
404 Permit Received	Spring 2025	Summer 2026	tbd	10/18/2021
Begin Construction	Fall 2025	Fall 2026	tbd	Winter 2025

Upper Cumberland River Service Area

Figure 8: Project Status in the Upper Cumberland River Service Area 2024



There are three active projects in this service area and two in the LTM phase. These projects are within the USACE Nashville District and the EKSAP region, which utilizes the EIU credit system (**Figure 8)**. The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 100 AMU advanced wetland credits. **Table 16** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24 (**Table 17**).

Table 15 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 15 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 9 shows the cumulative credit values of project by major milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 7 shows how credit

values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

Table 15: Upper Cumberland Credit Compliance Summary

Upper Cumberland River Service Area

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/Prospectus Approved
Transition	3,954.00	3,954.00	3,730.60	3,730.60	3,730.60	3,954.00
2012	3,182.19	3,182.19	-	-	-	3,182.19
2013	49.50	49.50	-	-	-	49.50
2014	52.25	52.25	-	-	-	52.25
2015	298.00	298.00	-	-	-	298.00
2015	4,764.99	4,764.99	-	-	-	4,764.99
2016	22.03	22.03	-	-	-	22.03
2017	132.45	132.45	-	-	-	132.45
2017	-	-	-	-	-	-
2018	156.00	156.00	-	-	-	156.00
2018	343.70	343.70	-	-	-	343.70
2019	985.00	985.00	-	-	-	985.00
2020	-	-	-	-	-	-
2020	56.20	56.20	-	-	-	56.20
2021	59.40	59.40	-	-	-	59.40
2022	464.00	464.00	-	-	-	464.00
2022	-	-	-	-	-	-
2023	1,602.00	1,602.00	-	-	-	1,602.00
2024	2,601.50	2,233.89	-	-	-	2,233.89
Future		-	-	-	-	-
Total	18,723.21	18,355.60	3,730.60	3,730.60	3,730.60	18,355.60

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/Prospectus Approved
Transition	2.250	2.250	-	-	-	2.25
2012	0.381	0.381	-	-	-	0.38
2013	3.360	3.360	-	-	-	3.36
2014	4.438	4.438	-	-	-	4.44
2014	0.134	0.134	-	-	-	0.13
2015	7.278	7.278	-	-	-	7.28
2016	-	-	-	-	-	-
2017	-	-	-	-	-	-
2017	-	-	-	-	-	-
2018	-	-	-	-	-	-
2018	0.200	0.200	-	-	-	0.20
2019	0.700	0.700	-	-	-	0.70
2020	-	-	-	-	-	-
2020	1.100	1.100	-	-	-	1.10
2021	-	-	-	-	-	-
2022	-	-	-	-	-	-
2022		-	-	-	-	-
2023	-	-	-	-	-	-
2024	-	-	-	-	-	-
Future		7.259	-	-	-	7.26
Total	19.841	27.100	-	-	-	27.10

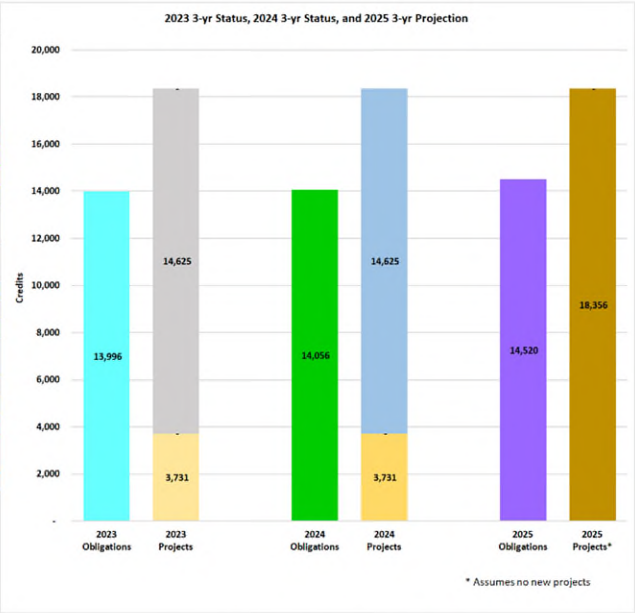
Figure 9: Upper Cumberland comparison of credit sales to project credit values, organized by year and by major milestones.

Upper Cumberland River Service Area

Stream

Year	Credits Sold	All Projects
Transition	3,954.00	3,954.00
2012	3,182.19	3,182.19
2013	49.50	49.50
2014	52.25	52.25
2015	298.00	298.00
2015	4,764.99	4,764.99
2016	22.03	22.03
2017	132.45	132.45
2017	-	-
2018	156.00	156.00
2018	343.70	343.70
2019	985.00	985.00
2020	-	-
2020	56.20	56.20
2021	59.40	59.40
2022	464.00	464.00
2022	-	-
2023	1,602.00	1,602.00
2024	2,601.50	2,233.89
Future		-
Total	18,723.21	18,355.60

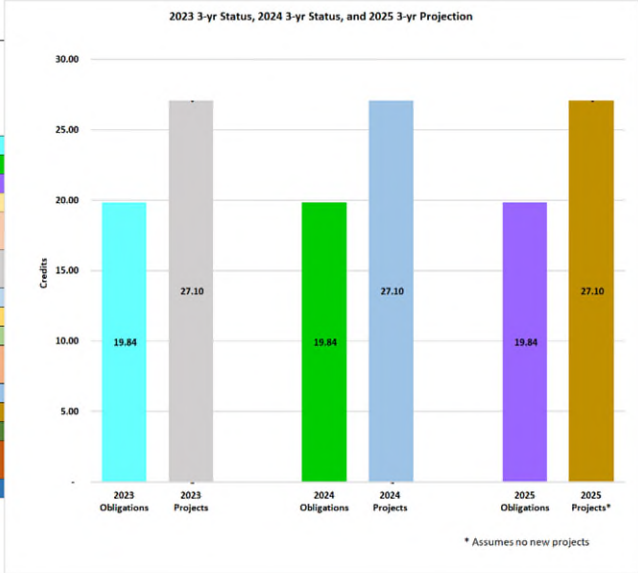
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	2.250	2.250
2012	0.381	0.381
2013	3.360	3.360
2014	4.438	4.438
2014	0.134	0.134
2015	7.278	7.278
2016	-	-
2017	-	-
2017	-	-
2018	-	-
2018	0.200	0.200
2019	0.700	0.700
2020	-	-
2020	1.100	1.100
2021	-	-
2022	-	-
2022		-
2023	-	-
2024	-	-
Future		7.259
Total	19.841	27.100

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Credit Costs, Balances and CY24 Activity

Table 16: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream EIU Regions	Upper Cumberland
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	227,380.89
CY2024 Credits Sold	2,601.50
CY2024 Released Credits	-
CY2024 Ending Advance Stream EIU Balance	224,779.39

WETLAND AMUs (con't)	Upper Cumberland
Advance Credit Allocation	100.000
CY2024 Beginning Credit Balance	-
CY2024 Credits Sold	-
Credits Withdrawn **	80.159
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	

**Wetland credits withdrawn by Nashville Corps District

Table 17: Credit Costs in the Upper Cumberland Service Area

Service Area	Stream Cost/Credit		Wetland Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Upper Cumberland (EIU)	1,183	1,183	78,000	78,000

In CY24, FILO sold 2,601 stream EIUs in the Upper Cumberland Service Area contributing 3M into the in-lieu-fee categories and representing 15% of total receipts received from all service areas. In-lieu-fee payments to FILO from mitigation impacts caused by 404-permitted activities including impact types and the amounts are included in **Table 18**. Full or partial disclosure of records concerning funds can be requested through the Freedom of Information Act (FOIA).

Table 18: Receipts for Purchased Credits including Impact Types

Receipts - type of payment	Amount	Service Area	County	Stream / Wetland	Credits	Perennial Credits	Intermittent Credits	Ephemeral Credits	Wetland Credits
development	$ 1,127,990.50	UC	Knox	S	953.5		796.6	156.9	
transportation	$ 1,179,451.00	UC	Harlan	S	997.0	434.0	585.0		
transportation	$ 313,495.00	UC	Laurel	S	265.0		265.0		
transportation	$ 456,638.00	UC	Laurel	S	386.0	135.0	187.0		

In response to CY21 annual reporting status for wetland AMUs in Upper Cumberland River Service Area, USACE Nashville District directed the FILO program to suspend wetland credit sales in the service area, citing the age of sold credits and lack of projects in the basin, the Louisville and Nashville District agreed the FILO program should earmark $3,000,000 of reserve funds to augment project funds for acquiring and implementing wetland projects in service areas that had fallen behind schedule. In CY22 project sites were located and acquired in the Upper

Cumberland River Service Area that will more than cover the current mitigation obligation. However, credit sales were not allowed to resume by the end of CY24.

Below is a list of active projects in the service area that have been designated LRN numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 20**).

Active Project Status

Burnett Branch, Wayne, and McCreary Counties: FILO partnered with the KDOW Wild Rivers program to acquire the property for preservation and restoration. In 2015, the mineral rights were acquired on an initially excluded portion of the property. In 2016, FILO reassessed the entire property according to the Nashville USACE's new stream assessment protocol. In 2017, the property's deed was amended to include restrictions with language suitable to USACE. In 2018, the Mitigation Plan was completed, and the project was put on public notice in preparation for the 401 Water Quality Certification. In 2019, FILO submitted a Phase 2 Archaeological Survey Report for Section 106 of the National Historic Preservation Act and a Biological Assessment for Section 7 of the Endangered Species Act. In 2020, FILO received concurrence for Section 106. Some preparation for native grassland conversion was implemented in conjunction with KY Nature Preserves (KNP) staff in 2021 and 2022. The KDFWR entered into a Memorandum of Agreement (MOA) with KNP for invasive species treatment and native grass conversion. This work was conducted in 2022 and 2023 across the whole site. In 2023, the site was re-treated for invasive species. The KDFWR plans to continue with invasive work and native grass establishment. In 2023 and 2024, FILO continued revising the Mitigation Plan, updating the design plan, and updating the Biological Assessment. FILO plants to submit the final Mitigation Plan and permit applications in 2025.

Sinking Valley, Pulaski County: The Mitigation Plan for preservation was accepted in December 2013. This project has bi-annual monitoring requirements for 10 years. FILO staff performed the prescribed monitoring for 2023 and submitted the report (2023; Year 9 of 10) in December 2023. Upon submittal of the 2023 report, FILO requested monitoring release for this project. Release is pending final documentation from the IRT.

Marsh Creek, McCreary County: IRT approved in 2022, this project was presented as part of a Full Delivery contract with Resource Environmental Solutions, LLC (RES). It is expected to generate approximately 1,000 stream credits and 25 wetland credits and will be permanently protected via a third-party site protection instrument. In 2023, FILO submitted a Cultural Historic Survey Report for Section 106 of the National Historic Preservation Act, a Biological Assessment for Section 7 of the Endangered Species Act, and the Prospectus to USACE Also in 2023, FILO (and RES) received Section 106 concurrence. In 2024, FILO (and RES) submitted the Final Prospectus, the KDOW Pre-Filing Meeting request, and the Draft Mitigation Banking Instrument.

LTM Project Status

Crane's Nest was visited and there were no LTM activities necessary in 2024 in the Upper Cumberland River Service Area. This project SPI is an easement on private property. The Original landowner recently transferred their property to a new owner. That owner has been notified of the easement and restrictions.

Table 19: 2024 LTM Actions in the Upper Cumberland River Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Upper Cumberland	Cranes Nest	10/18/2023	Good	Good	Project visited and no actions needed

Table 20: Project Status in the Upper Cumberland River Service Area

Count	Project	Status	County	USACE District	404 Permit #
1	Marsh Creek	CP Approved	McCreary	Nashville	LRN-2022-00766
2	Burnett Br	Design/Permit	Wayne McCreary	Nashville	LRN-2013-00116
3	Cranes Nest	Released - Long Term Management	Knox	Nashville	2009-01424
4	Sinking Valley	Monitoring - YR 9 (of 10)	Pulaski	Nashville	LRN-2012-00326
5	Buck Cr - preservation	Released - Long Term Management	Pulaski	Nashville	NA
1	Steele Branch	Approved - Terminated	Wayne McCreary	Nashville	LRN-2012-01244
2	Mulbery Cr	Approved - Terminated	Whitley	Nashville	LRN-2016-00783
3	Lonesome Cr	Approved - Terminated	Wayne	Nashville	LRN-2018-00488

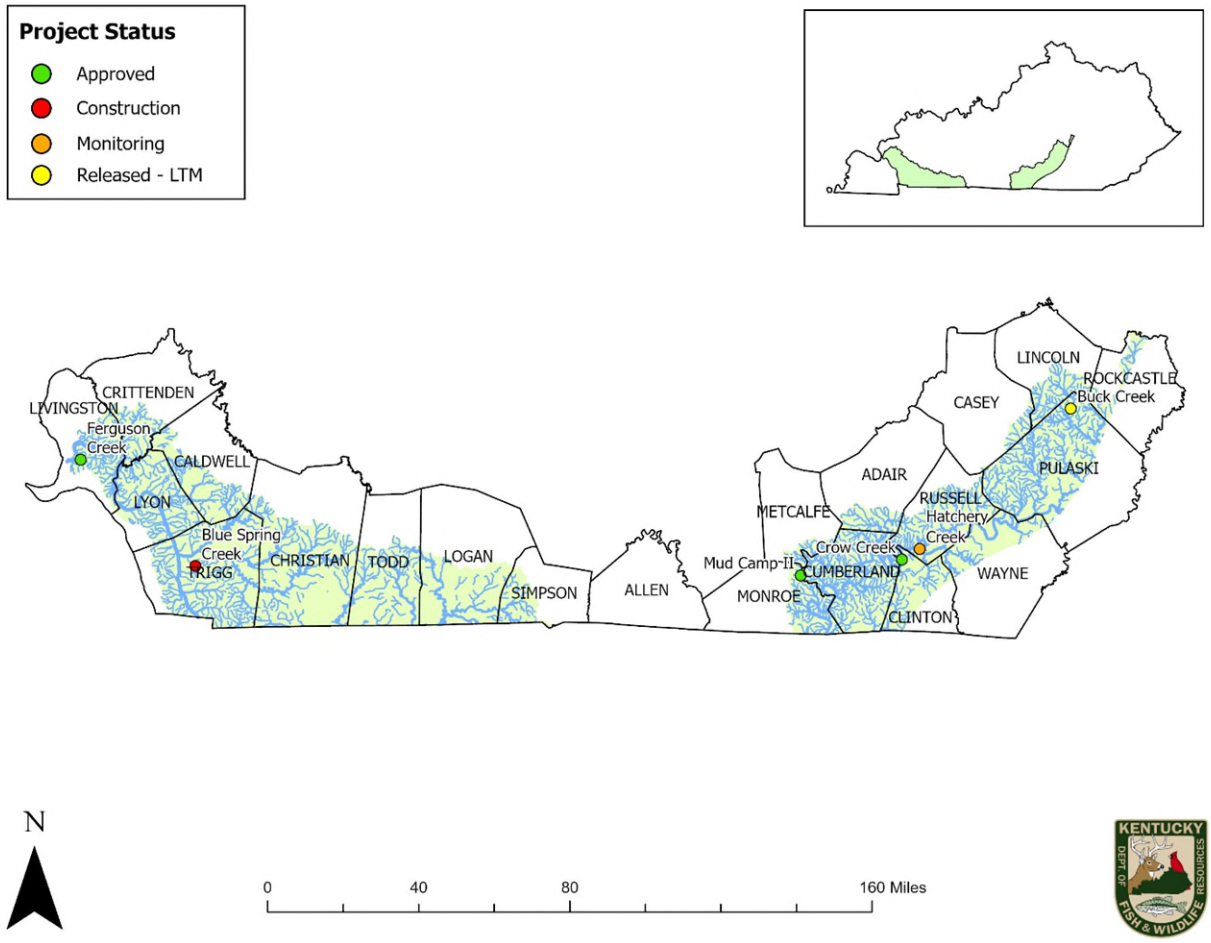
Table 21 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit, where the bulk of design and permitting processes occur. **Table 21** shows a subset of projects that are in this stage of development. For the Upper Cumberland River Service Area, the Burnette Branch project will exceed the stream credit sales obligation. The Marsh Creek project is one of three "Full Delivery" projects, a contracting mechanism in which vendors provide mitigation projects and deliver credits.

Table 21: Project Status by Permit Milestone between SPI and Construction.

Project	Marsh Creek FD	Burnett Branch
KDFWR Service Area	Upper Cumberland	Upper Cumberland
USACE LRL#/LRN#/MVM#	LRN-2022-00766	LRN-2013-00116
Section 7 Submittal	11/30/2023	Winter 2025
ection 7 Concurrence	Fall 2024	Spring 2025
ection 106 Submittal	9/7/2023	3/19/2018
ction 106 Concurrence	11/3/2023	6/5/2020
T Design Review Date	NA	NA
JD Site Visit	NA	NA
Design Review and PJD comments received	NA	NA
Draft MP Submittal	8/1/2024	9/6/2018
omit Pre-Filing Request	10/2/2024	Winter 2025
401 Application Date	Winter 2025	Spring 2025
01 FP Permit Received	Spring 2025	Summer2025
WQC Permit Received	Spring 2025	Summer 2025
404 Application Date	Winter 2025	Spring 2025
404 Permit Received	Spring 2025	Fall 2025
Begin Construction	Fall 2025	Winter 2026

Lower Cumberland River Service Area

Figure 10: Project Status in the Lower Cumberland River Service Area 2024



There are four active projects in this service area and two in the LTM phase. These projects are within the USACE Nashville District and the KAP region, which utilizes the AMU credit system. This service area has two different geographic areas in Kentucky, one in Western Kentucky and one in south-central Kentucky (**Figure 10**). The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 100 AMU advanced wetland credits. **Table 23** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24

Table 22 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 22 is

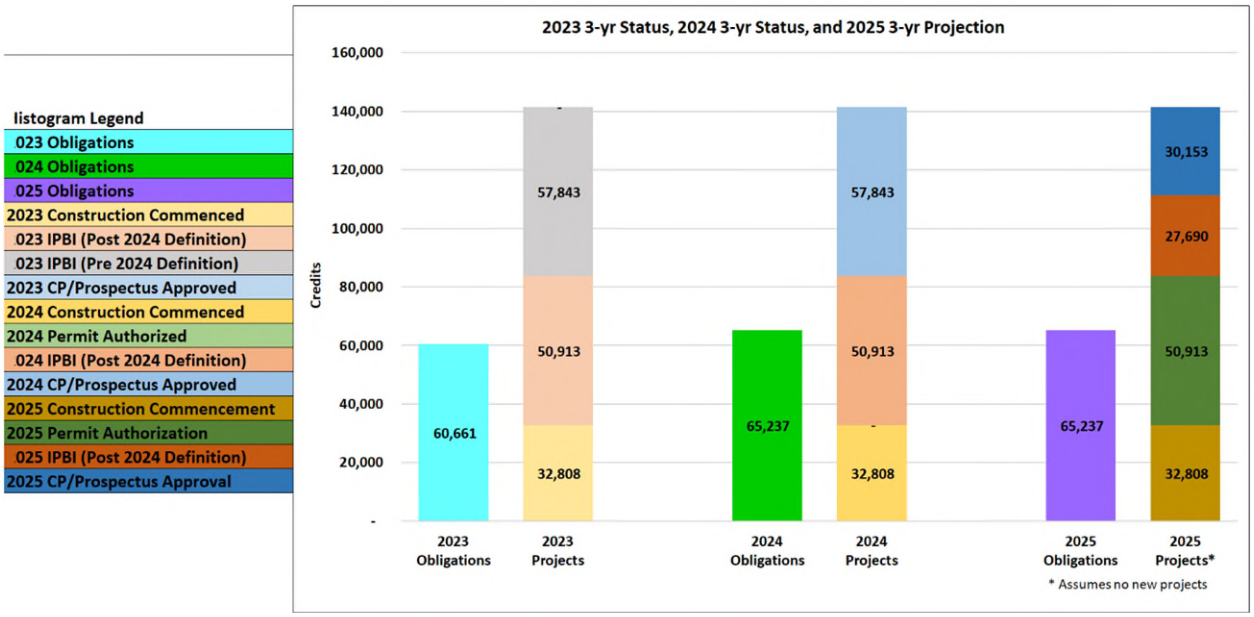
an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 11 shows the cumulative credit values of project by major milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 11 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

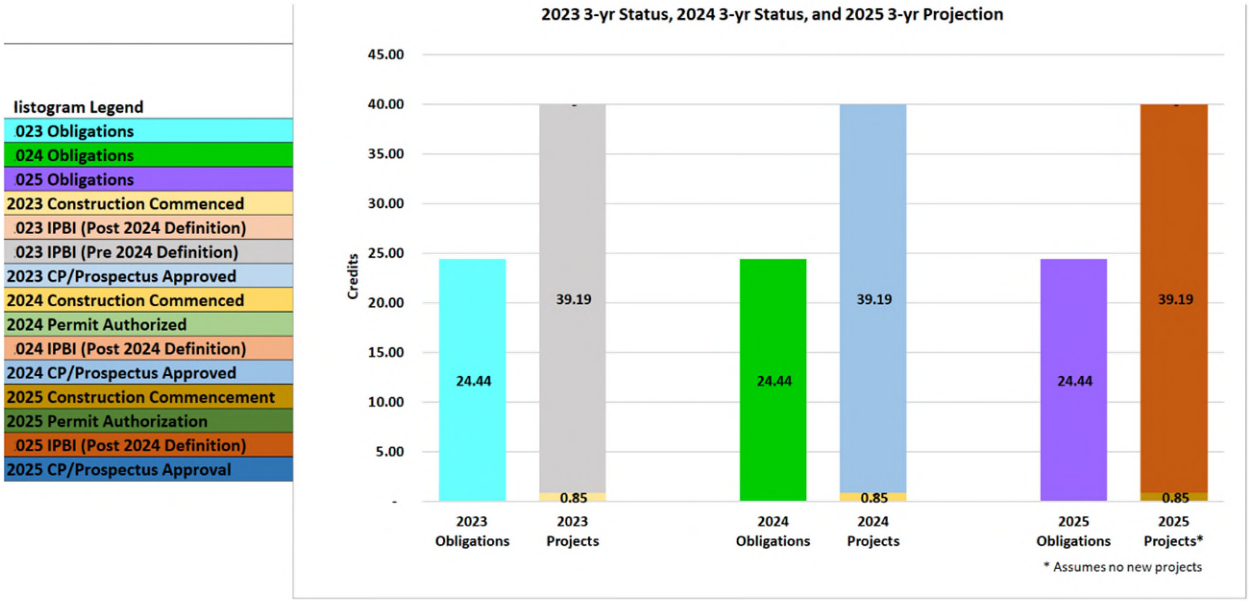
Table 22: Lower Cumberland Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00
2012	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00
2013	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71
2014	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00
2015	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20
2016	850.00	850.00	850.00	850.00	850.00	850.00
2017	27,938.90	27,938.90	9,411.19	9,411.19	27,938.90	27,938.90
2017	8,696.60	8,696.60	-	-	8,696.60	8,696.60
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	629.00	629.00	-	-	629.00	629.00
2020	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	4,576.00	4,576.00	-	-	4,576.00	4,576.00
2022	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	1,584.00	1,584.00	-	-	1,584.00	1,584.00
2024	174.00	174.00	-	-	174.00	174.00
Future		74,568.69	-	-	16,725.69	74,568.69
Total	66,995.41	141,564.10	32,808.10	32,808.10	83,721.10	141,564.10

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	9.980	9.980	0.85	0.85	0.85	9.98
2012	4.180	4.180	-	-	-	4.18
2013	-	-	-	-	-	-
2014	3.600	3.600	-	-	-	3.60
2015	0.700	0.700	-	-	-	0.70
2016	-	-	-	-	-	-
2017	-	-	-	-	-	-
2017	5.483	5.483	-	-	-	5.48
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	-	-	-	-	-	-
2020	-	-	-	-	-	-
2020	0.500	0.500	-	-	-	0.50
2021	-	-	-	-	-	-
2022	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	-	-	-	-	-	-
Future		15.593	-	-	-	15.59
Total	24.443	40.036	0.85	0.85	0.85	40.04

Figure 11: Lower Cumberland comparison of credit sales to project credit values, organized by year and by major milestones.





Credit Costs, Balances and CY24 Activity

Table 23: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream AMU Regions	Lower Cumberland
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	173,178.59
CY2024 Credits Sold	174.00
CY2024 Released Credits	-
CY2024 Ending Advance Stream AMU Balance	173,004.59

WETLAND AMUs	Lower Cumberland
Advance Credit Allocation	100.000
CY2024 Beginning Credit Balance	-
CY2024 Credits Sold	-
Credits Withdrawn **	75.992
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	-

**Wetland credits withdrawn by Nashville Corps District

Table 24: Credit Costs in the Lower Cumberland Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Lower Cumberland (AMU)	528	528	78,000	78,000

In CY24, FILO sold 174 stream EIUs in the Lower Cumberland Service Area representing less than 5% of total funds received from receipts over all service areas. In-lieu-fee payments to FILO from mitigation impacts caused by 404-permitted activities including impact types and the amounts are included in **Table 25**. Full or partial disclosure of records concerning funds can be requested through the Freedom of Information Act (FOIA).

Table 25: Receipts for Purchased Credits including Impact Types

Receipts - type of payment	Amount	Service Area	County	Stream / Wetland	Credits	Perennial Credits	Intermittent Credits	Ephemeral Credits	Wetland Credits
transportation	$ 91,872.00	LC	Russell	S	174.0		174.0		

In response to CY21 annual reporting status for wetland AMUs in Lower Cumberland River Service Area, USACE Nashville District directed the FILO program to suspend wetland credit sales in the service area, citing the age of sold credits and lack of projects in the basin, the Louisville and Nashville District agreed the FILO program should earmark $3,000,000 of reserve portions of FILO funds to augment project funds for acquiring and implementing wetland projects in service areas that had fallen behind schedule. In CY22 project sites were located and acquired in the Lower Cumberland River Service Areas that will more than cover the current mitigation obligation. However, credit sales were not allowed by the end of CY24.

In the meantime, FILO staff have continued their efforts in locating potential project sites in the Lower Cumberland River Service Area through various landowner contacts, KDFWR staff and consultants. Below is a list of active projects in the service area that have been designated LRN numbers from the USACE. Projects that have been terminated had significant efforts to successfully proceed forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 29**).

Active Project Status

Blue Spring Creek, Trigg County: The project is entirely within Lake Barkley State Resort Park with a substantial part on the park's golf course. From 2020-2022, FILO constructed approximately half of the project. In 2022 and 2023, construction was delayed due to contractual issues, and FILO has worked to resolve the issues to complete the project. It is anticipated to continue construction in 2024 and request as-built release in early 2026.

Hatchery Creek, Russell County: Construction began in August 2014 with final project completion in early 2016. FILO submitted the Year 5 monitoring report in 2020. A virtual compliance visit was held with the IRT in November 2021 to discuss project release options. A final decision is pending feedback from USACE. Long-term management actions continue annually on site. In 2023, FILO staff removed invasive species, mainly autumn olive (*Elaegnus*

umbellata), and then planted native trees in their place. In 2024, the focus remained on beaver dam removal, described below.

Table 26: Hatchery Creek 2024 Maintenance Activities

Date	Staff	Action	Amount	Description
4/2/2024	WK, BP	Beaver dam removal	2 dams	Removed beaver dams that were restricting flow and fish passage.
5/7/2024	WK, BP	Beaver dam removal	2 dams	Removed beaver dams that were restricting flow and fish passage.
6/27/2024	WK, AG, KS	Beaver dam removal	2 dams	Removed beaver dams that were restricting flow and fish passage.
8/15/2024	AG, KS	Beaver dam removal	2 dams	Removed beaver dams that were restricting flow and fish passage.
11/26/2024	AG, JB, KS, JL	Beaver dam removal	4 dams	Removed beaver dams that were restricting flow and fish passage.

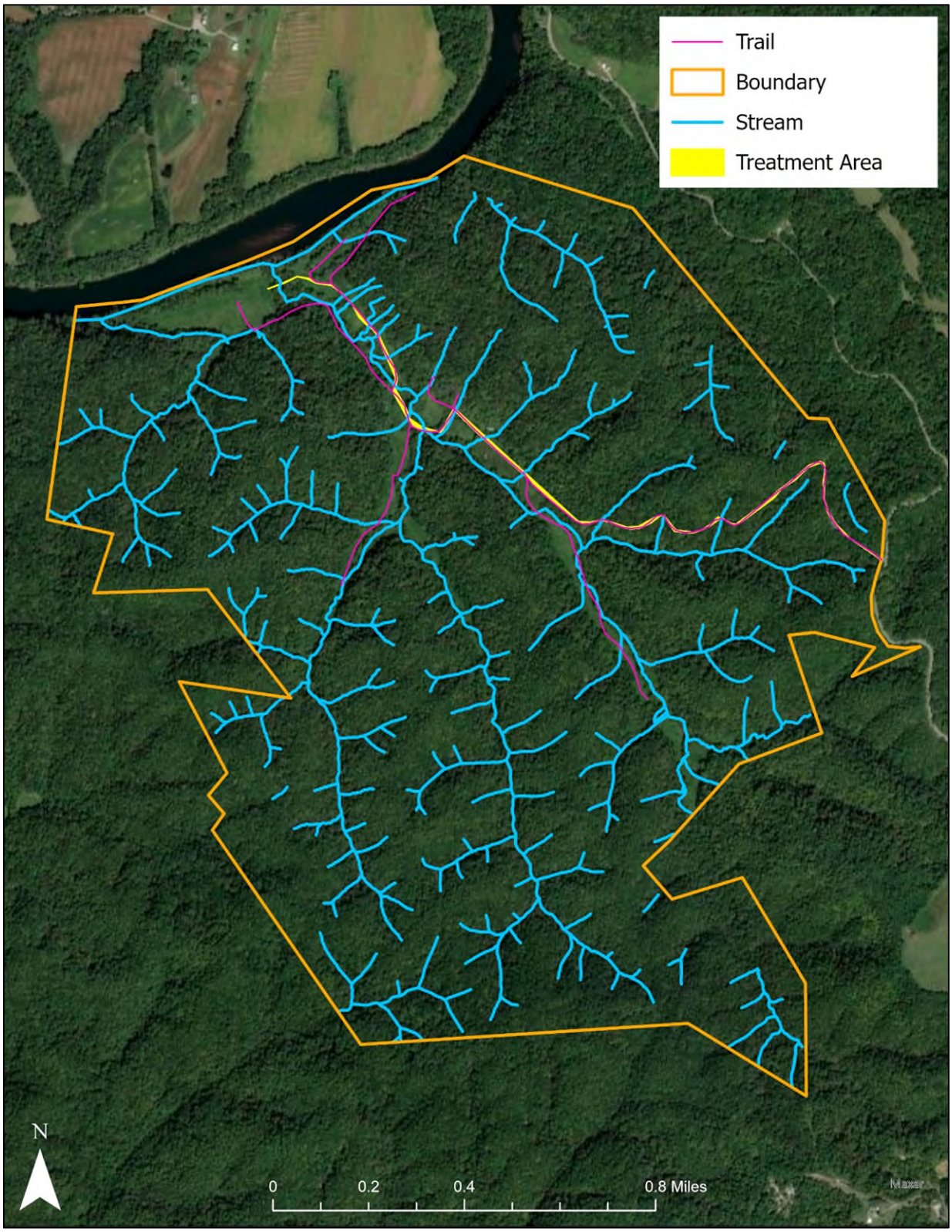
Mud Camp II, Cumberland County: Mud Camp I and III were IRT approved projects but later, Mud Camp I was terminated due to landowners rejecting offers for land based on the highest fair market appraisal. Mud Camp II is roughly 800 acres and was acquired by KDFWR in 2021. In 2022, FILO started designing the project, began surveys for the Biological Assessment for Section 7 of the Endangered Species Act and the Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act. In 2023, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and received Section 7 concurrence. Also in 2023, FILO submitted the Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act and received Section 106 concurrence. In 2024, FILO received Section 7 concurrence and continued communicating the project extents with the IRT.

Crow Creek, Clinton County: Approved by the IRT in 2020, Crow Creek is 890 acres with Cumberland River frontage. The property was acquired by KDFWR in 2021. In 2022, FILO started designing the project, conducted surveys for the Biological Assessment for Section 7 of the Endangered Species Act and the Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act. In 2023, FILO submitted the Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act and received Section 106 concurrence. Also in 2023, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and conducted a Preliminary Design Meeting. FILO staff removed invasive species in 2023 as part of IPBI compliance and continued this treatment in 2024 (detailed below). In conjunction with Kentucky Energy and Environment Cabinet, wells were capped as part of IPBI compliance following execution of SPI. Also in 2024, FILO submitted the Final Prospectus and conducted portions of a Phase 2 Archaeological survey that is expected to continue into 2025.

Table 27: Crow Creek 2024 IPBI Activities

Date	Staff	Action	Amount	Description
9/18/2024	BW, JB	Invasive treatment	3 gallons	Foliar sprayed 3% glyphosate with backpack sprayers. Species targeted: Multiflora rose, Sericea lespedeza
9/19/2024	KS, BW	Trail clearing	N/A	Cleared trails for easier access.
10/2/2024	KS, KB, AG	Invasive treatment	5 gallons	Foliar sprayed 3% glyphosate with the UTV sprayer. Species targeted: Multiflora rose, Autumn olive, and Chinese privet
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

Figure 12: Crow Creek 2024 IPBI Treatment Area



Ferguson Creek, Livingston County: Approved in 2021, FILO acquired the property and executed SPI as deed restrictions in late 2022, officially removing this tree farm from production. In 2023, FILO started developing concepts with a design consultant. This site is considered to have potential to benefit multiple State Wildlife Action Plan species of concern, so FILO staff have connected with Kentucky Nature Preserves and the non-game (non-FILO) staff in KDFWR. This forms a collective team of experts to review and offer guidance regarding maximizing proposed mitigation measures to include consideration to benefit multiple ecological habitats, including species of greatest conservation need as defined in the state wildlife action plan. FILO staff spent two days in 2023 using both backpack sprayers and 25-gallon UTV sprayers to mostly spray cattail (*Typha* sp.), but other species were also treated. Multiple site access and construction staging locations were constructed in strategic upland areas onsite, in a manner that will deter on-road and off-road vehicles, as well as allow for strategic construction equipment and material staging. Invasive vegetation treatment is listed in the table below. The table and figure below detail the treatments events and areas that were sprayed. In 2024, FILO started designing the project, conducted surveys for the Biological Assessment for Section 7 of the Endangered Species Act and the Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act. FILO expects to submit the Final Prospectus in early 2025.

LTM Project Status

There were no remedial LTM activities necessary in the Lower Cumberland River Service Area and no easement or stability concerns were raised. **Table 28** below describes the LTM sites that were visited in 2024.

Table 28: 2024 LTM Actions for the Lower Cumberland River Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Lower Cumberland	Buck Creek Pumphrey	10/18/2023	Good	Good	Project visited and no actions needed

Table 29: Project Status in the Lower Cumberland River Service Area

Count	Project	Status	County	USACE Distrct	404 Permit #
1	Ferguson Creek Wetland	CP Approved	Livingston	Nashville	LRN-2018-00128
2	Crow Creek	Design/Permit	Clinton	Nashville	LRN-2020-00539
3	Mud Camp II	Design/Permit	Cumberland	Nashville	LRN-2020-00540
4	Blue Spring Cr	Construction	Trigg	Nashville	LRN-2013-00776
5	Hatchery Cr	Release Pending	Russell	Nashville	LRN-2010-00444
6	Buck Cr - Trib	Released - Long Term Management	Pulaski	Nashville	LRN-2006-2255
1	Puncheon Cr	Approved - Terminated	Pulaski	Nashville	-
2	Bear Den Hollow	Approved - Terminated	Pulaski	Nashville	LRN-2016-00784
3	Doan Springs	Approved - Terminated	Crittenden	Nashville	LRN-2017-00426
4	Elkton Lake	Approved - Terminated	Todd	Nashville	LRN-2018-00451
5	Mud Camp I	Approved - Terminated	Cumberland	Nashville	LRN-2019-00761
6	Mud Camp III	Approved - Terminated	Cumberland	Nashville	LRN-2020-01203

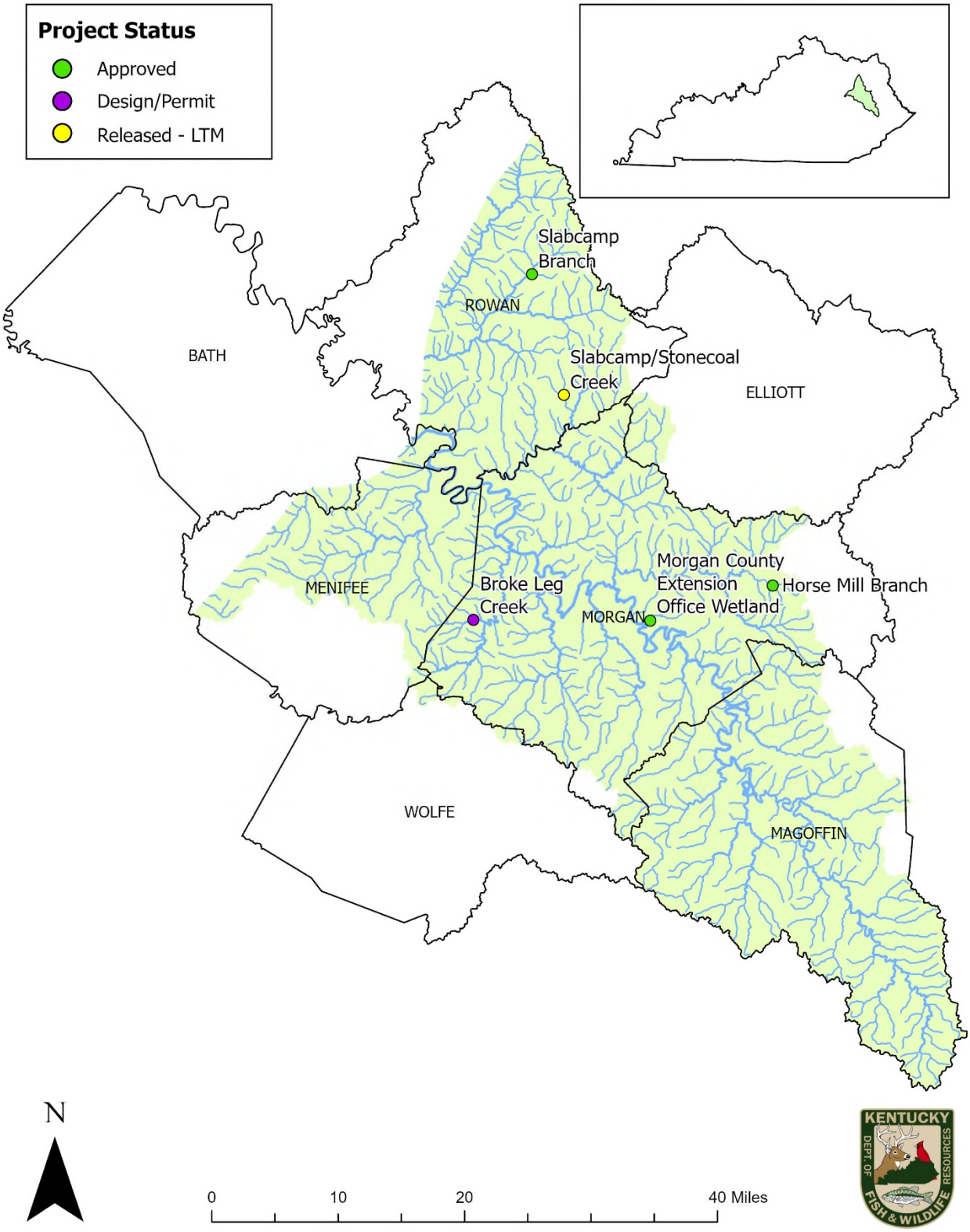
Table 29 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit, where the bulk of design and permitting processes occur. **Table 30** shows a subset of projects that are in this stage of development. For the Lower Cumberland River Service Area, the Blue Springs Creek project is still under construction and will continue in 2025. Crow Creek and Mud Camp II have been processed thus far essentially concurrently, however only one is necessary to meet stream credit obligations. Ferguson Creek should have a completed permit submittal in 2025 and is expected to exceed the wetland credit sales to date.

Table 30: Project Status by Permit Milestone between SPI and Construction.

Project	Blue Spring	Crow Creek	Ferguson Creek	Mud Camp 2
KDFWR Service Area	Lower Cumberland	Lower Cumberland	Lower Cumberland	Lower Cumberland
USACE LRL#/LRN#/MVM#	LRN-2013-00776	LRN-2020-00539	LRN-2018-00128	LRN-2020-00540
Section 7 Submittal	1/15/2015	1/11/2023	Winter 2025	1/11/2023
Section 7 Concurrence	3/12/2015	6/22/2023	Spring 2025	11/22/2024
Section 106 Submittal	11/1/2016	1/18/2023	Winter 2025	2/3/2023
Section 106 Concurrence	8/13/2015	Winter 2025	Spring 2025	8/28/2023
IRT Design Review Date	NA	8/31/2023	NA	8/31/2023
JD Site Visit	NA	1/29/2024	NA	NA
Design Review and PJD comments received	NA	NA	NA	NA
Draft MP Submittal	12/30/2014	1/14/2024	Fall 2024	Spring 2025
Submit Pre-Filing Request	NA	Winter 2025	Fall 2024	Spring 2025
401 Application Date	1/13/2015	Winter 2025	Winter 2025	Fall 2025
401 FP Permit Received	2/10/2015	Winter 2025	Spring 2025	Winter 2026
401 WQC Permit Received	9/27/2016	Winter 2025	Spring 2025	Winter 2026
404 Application Date	11/4/2016	Spring 2025	Spring 2025	Spring 2026
404 Permit Received	12/2/2019	Summer 2025	Fall 2025	Summer 2026
Begin Construction	9/1/2020	Fall 2025	Winter 2026	Fall 2026

Upper Licking River Service Area

Figure 13: Project Status in the Upper Licking River Service Area 2024



There are four active projects in this service area and one in the LTM phase. These projects are within the USACE Louisville District and the EKSAP region, which utilizes the EIU credit system (**Figure 13**). The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 100 AMU advanced wetland credits. **Table 32** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24 (**Table 33**).

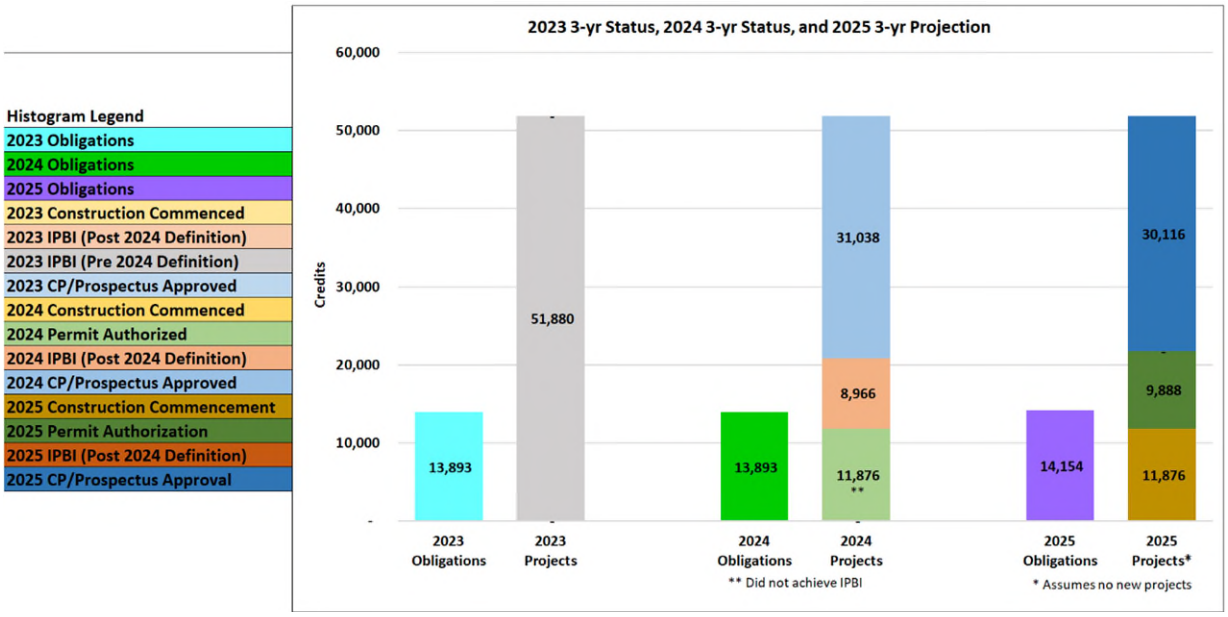
Table 31 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 31 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 13 shows the cumulative credit values of project by major milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 14 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

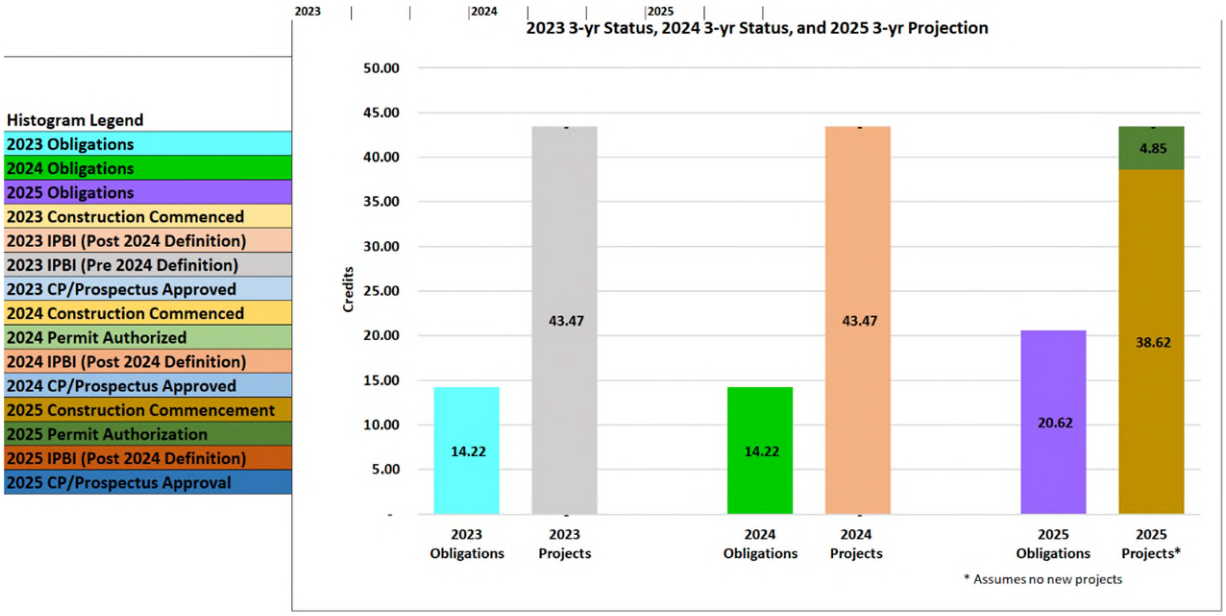
Table 31: Upper Licking Credit Compliance Summary

Stream			2024	2024	2024	2024	2025
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement
Transition	258.00	258.00	-	258.00	-	258.00	258.00
2012	838.00	838.00	-	838.00	-	838.00	838.00
2013	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-
2015	5,464.00	5,464.00	-	5,464.00	-	5,464.00	5,464.00
2015	1,967.00	1,967.00	-	1,967.00	-	1,967.00	1,967.00
2016	931.00	931.00	-	931.00	-	931.00	931.00
2017	1,944.60	1,944.60	-	1,944.60	-	1,944.60	1,944.60
2017	2,271.00	2,271.00	-	473.40	1,797.60	2,271.00	473.40
2018	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-
2020	219.00	219.00	-	-	219.00	219.00	-
2021	-	-	-	-	-	-	-
2022	261.00	261.00	-	-	261.00	261.00	-
2022	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-
Future		37,726.40	-	-	6,688.40	37,726.40	-
Total	14,153.60	51,880.00	-	11,876.00	8,966.00	51,880.00	11,876.00

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	-	-	-	-	-	-
2012	-	-	-	-	-	-
2013	-	-	-	-	-	-
2014	-	-	-	-	-	-
2015	14.220	14.220	-	-	14.22	14.22
2016	-	-	-	-	-	-
2017	-	-	-	-	-	-
2017	-	-	-	-	-	-
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	-	-	-	-	-	-
2020	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	-	-	-	-	-	-
2022	6.400	6.400	-	-	6.40	6.40
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	-	-	-	-	-	-
Future		22.850	-	-	22.85	22.85
Total	20.620	43.470	-	-	43.47	43.47

Figure 14: Upper Licking comparison of credit sales to project credit values, organized by year and by major milestones.





Credit Costs, Balances and CY24 Activity

Table 32: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream EIU Regions	Upper Licking
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	225,846.40
CY2024 Credits Sold	-
CY2024 Released Credits	-
CY2024 Ending Advance Stream EIU Balance	225,846.40

WETLAND AMUs	Upper Licking
Advance Credit Allocation	100.000
CY2024 Beginning Credit Balance	79.380
CY2024 Credits Sold	-
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	79.380

Table 33: Credit Costs in the Upper Licking Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Upper Licking (EIU)	1,072	1,072	78,000	78,000

In CY24, FILO sold no stream EIUs or wetland AMUs in the Upper Licking Service Area. Below is a list of active projects in the service area that have been designated LRL numbers from the USACE. There are FILO projects in this service area that will provide ample mitigation for credit sales obligations to date. Projects that have been terminated had significant efforts to

successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 38**).

Active Project Status

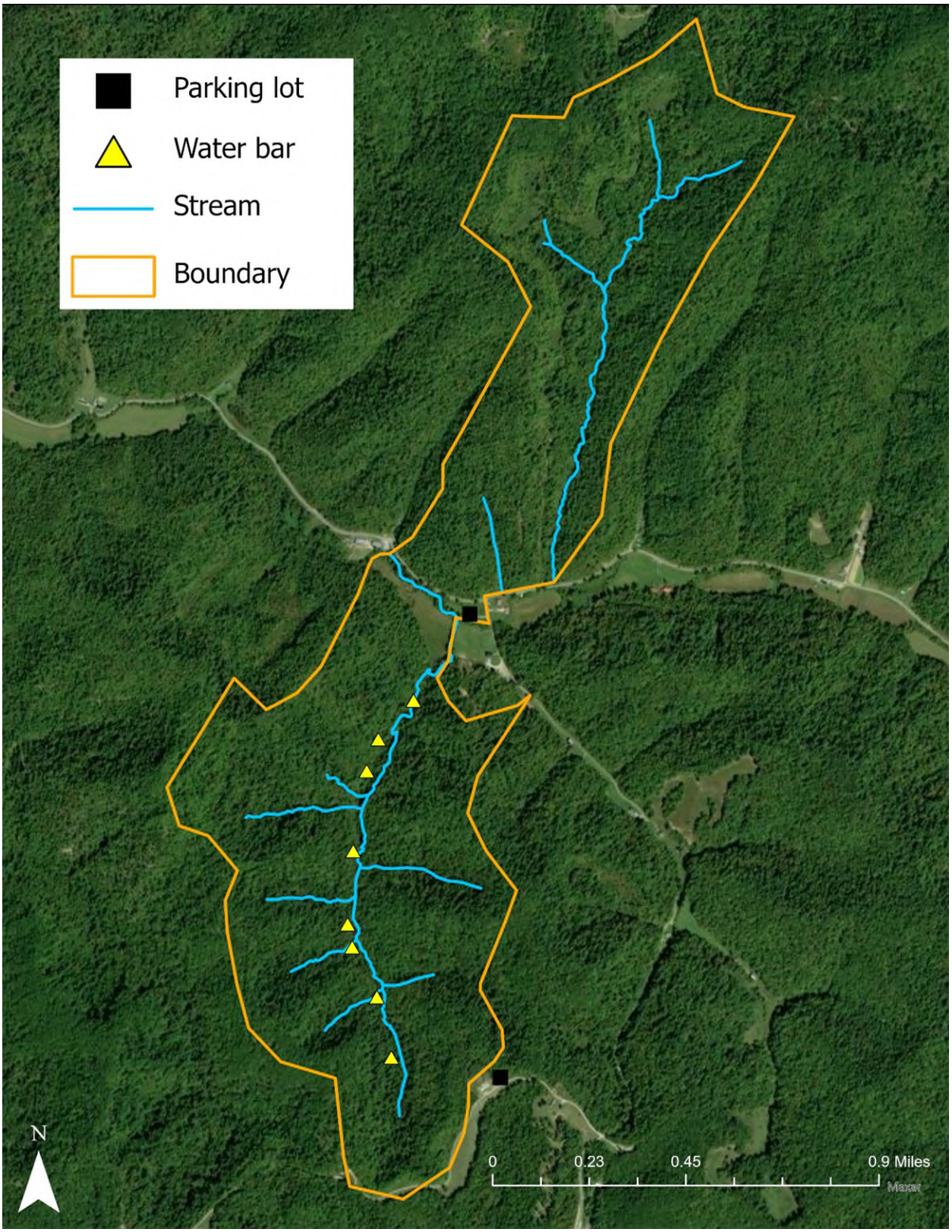
Broke Leg Creek, Morgan County: Approved in late 2016, this property has over 35,000 feet of stream length. In 2017, the landowner signed a land contract with the intent to donate a conservation easement. In 2022, FILO filed an easement, received Section 106 concurrence, and conducted additional bat surveys for Biological Assessment for Section 7 of the Endangered Species Act. In 2023, FILO continued working on the Mitigation Plan and coordinating the Biological Assessments with USACE and USFWS. In 2024, FILO received Section 7 concurrence and applied for and received the KDOW Floodplain Permit, 401 Water Quality Certification, and 404 Department of Army Permit. Also in 2024, FILO advertised the project for construction bidding and expects construction to begin in 2025.

Horse Mill Branch, Morgan County: In 2021, FILO started designing the project and conducted the Preliminary Design/JD and Assessment Verification meetings. In 2022, FILO conducted bat surveys for the Biological Assessment for Section 7 of the Endangered Species Act, received Section 106 concurrence, and started developing the design and Mitigation Plan. In 2023 and 2024, FILO continued developing the design and Mitigation Plan. In 2024, FILO submitted the Habitat Assessment for Section 7. Also in 2024, FILO staff completed water bar construction and assessed access along with the addition of gates and parking lots. The table and figure below show the activities completed.

Table 34: Horse Mill Branch 2024 IPBI/Maintenance Activities

Date	Staff	Action	Amount	Description
7/25/2024	AG, KS	Water bars	8 water bars	Marked where water bars would be built.
7/30/2024	BW, AG, KS	Water bars	8 water bars	Built water bars to reduce sedimentation and erosion.
7/30/2024	BW, AG, KS	Parking lot	N/A	Started clearing area for parking lot to limit unauthorized trespass and promote public access.
7/31/2024	BW, AG, KS	Parking lot	N/A	Started clearing area for parking lot to limit unauthorized trespass and promote public access.
11/18/2024	AG, JB, KS	Access	1 gate	Added wire gate at the top of the tower trail entrance, walked trails and checked water bars.
11/19/2024	AG, KS, JB	Access	1 gate	Added wire gate to trailhead, walked trail and checked on water bars.

Figure 15: Horse Mill Branch 2024 IPBI/Maintenance Area



Morgan Co. Extension Wetland, Morgan County: FILO acquired the property in 2021. Over 50 acres are proposed for various types of mitigation. In 2022, FILO conducted the Preliminary Design/JD and Assessment Verification meetings, started collecting design data, and began designing the project. FILO Staff have treated invasive herbaceous throughout the project site each year since the acquisition. In 2023, FILO continued developing the design and Mitigation Plan. In 2024, FILO submitted a Habitat Assessment for Section 7 of the Endangered Species Act and the Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act, and FILO received Section 106 concurrence. FILO staff continued treating the Japanese knotweed (*Reynoutria japonica*) that is growing across the stream adjacent to the wetland property to keep it from encroaching and added signage to mark the property boundary to prevent mowing and unauthorized trespass on the easement. These 2024 activities were completed to continue IPBI efforts and are detailed in the table and figure below.

Table 35: Morgan County Extension Office Wetland 2024 IPBI/Maintenance Activities

Date	Staff	Action	Amount	Description
9/18/2024	AG, KS	Invasive treatment	2.5 gallons	Foliar sprayed 3% glyphosate with UTV and backpack sprayers. Species targeted: Knotweed
10/15/2024	AG, JB	Boundary marking	5 signs	Added t-posts with signs to mark the property boundary to prevent unauthorized trespass and promote public access.
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

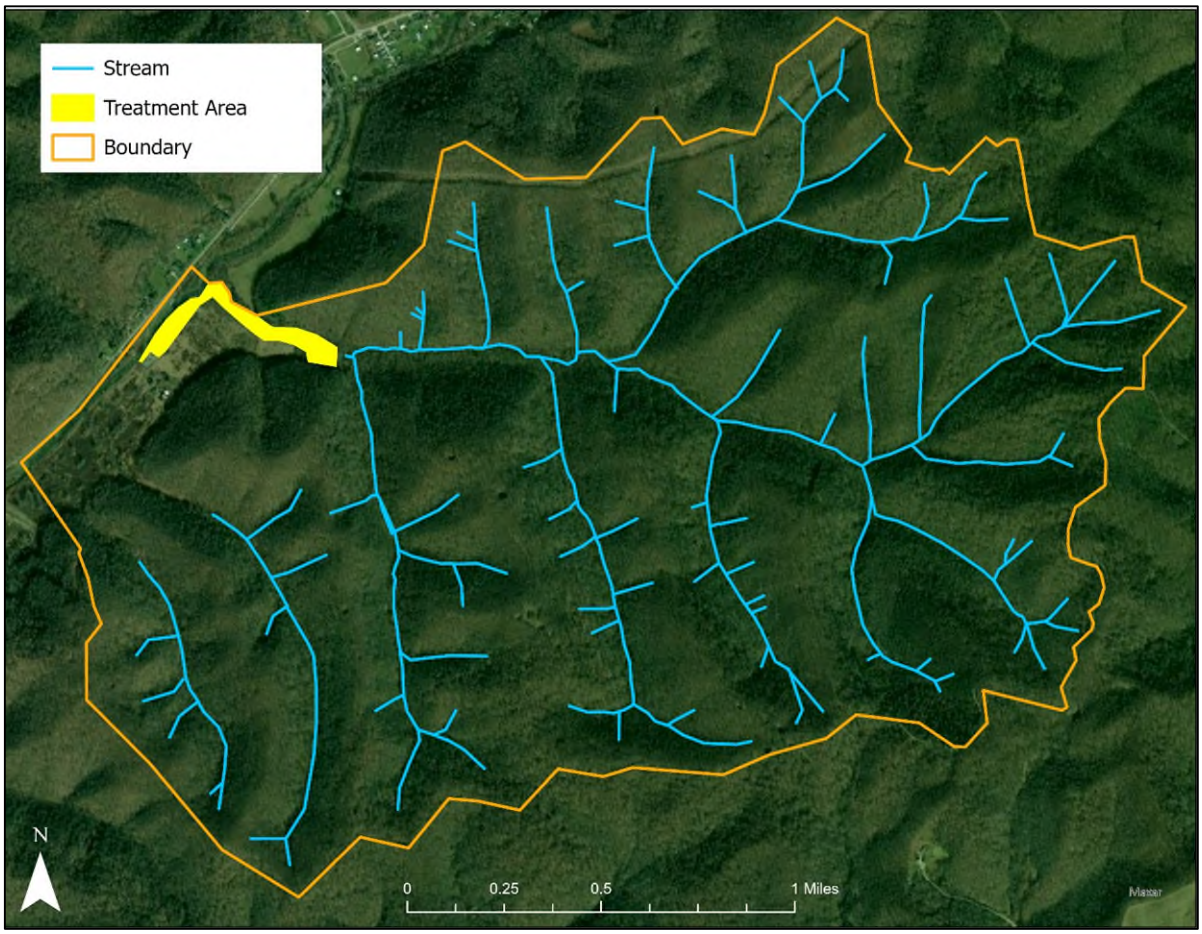
Figure 16: Morgan County Extension Office Wetland 2024 IPBI Treatment Area

Slabcamp Branch, MSU Property, Rowan County: In 2021, FILO acquired 142 acres at the downstream end of the project and conducted the Preliminary Design/JD and Assessment Verification meetings throughout the entire site. In 2022, FILO received Section 106 concurrence. In 2023, FILO continued developing the design and Mitigation Plan. FILO staff also treated invasive species along the mainstem, parking area, and trails that are part of the MSU property. This treatment was for IPBI compliance and was continued in 2024. The table and figure below detail the treatment.

Table 36: Slabcamp Branch (MSU) 2024 IPBI Activities

Date	Staff	Action	Amount	Description
10/1/2024	JB, AG, KS	Invasive treatment	5 gallons	Foliar sprayed 3% glyphosate via UTV and backpack sprayers. Species targeted: Multiflora rose, Autumn olive, Chinese privet, Bush honeysuckle, and Cattail
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

Figure 17: Slabcamp Branch (MSU) 2024 IPBI Treatment Area



LTM Project Status

There is only one project in the Upper Licking River Service Area in the LTM phase. No LTM activities were required in the Upper Licking River Service Area in 2024 and the table below describes the results of the LTM visit.

Table 37: 2024 LTM Actions in the Upper Licking River Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Upper Licking	Slabcamp/ Stonecoal	10/26/2023	Good	Good	Project visited and no actions needed

Table 38: Project Status in the Upper Licking River Service Area

Count	Project	Status	County	USACE District	404 Permit #
1	Morgan Co. Ext. Wetland	Design/Permit	Morgan	Louisville	LRL-2018-00682
2	Horse Mill Branch	Design/Permit	Morgan	Louisville	LRL-2018-00100
3	Slabcamp Branch	Design/Permit	Rowan	Louisville	LRL-2018-00562
4	Broke Leg Cr	Design/Permit	Morgan	Louisville	LRL-2016-00371-pgj
5	Slabcamp Cr	Released - Long Term Management	Rowan	Louisville	LRL-2009-762-pgj
1	Straight Cr	Approved - Terminated	Morgan	Louisville	LRL-2015-896
2	Slabcamp Cr #2	Approved - Terminated	Rowan	Louisville	-
3	Ratliff	Approved - Terminated	Menifee	Louisville	LRL-2016-896

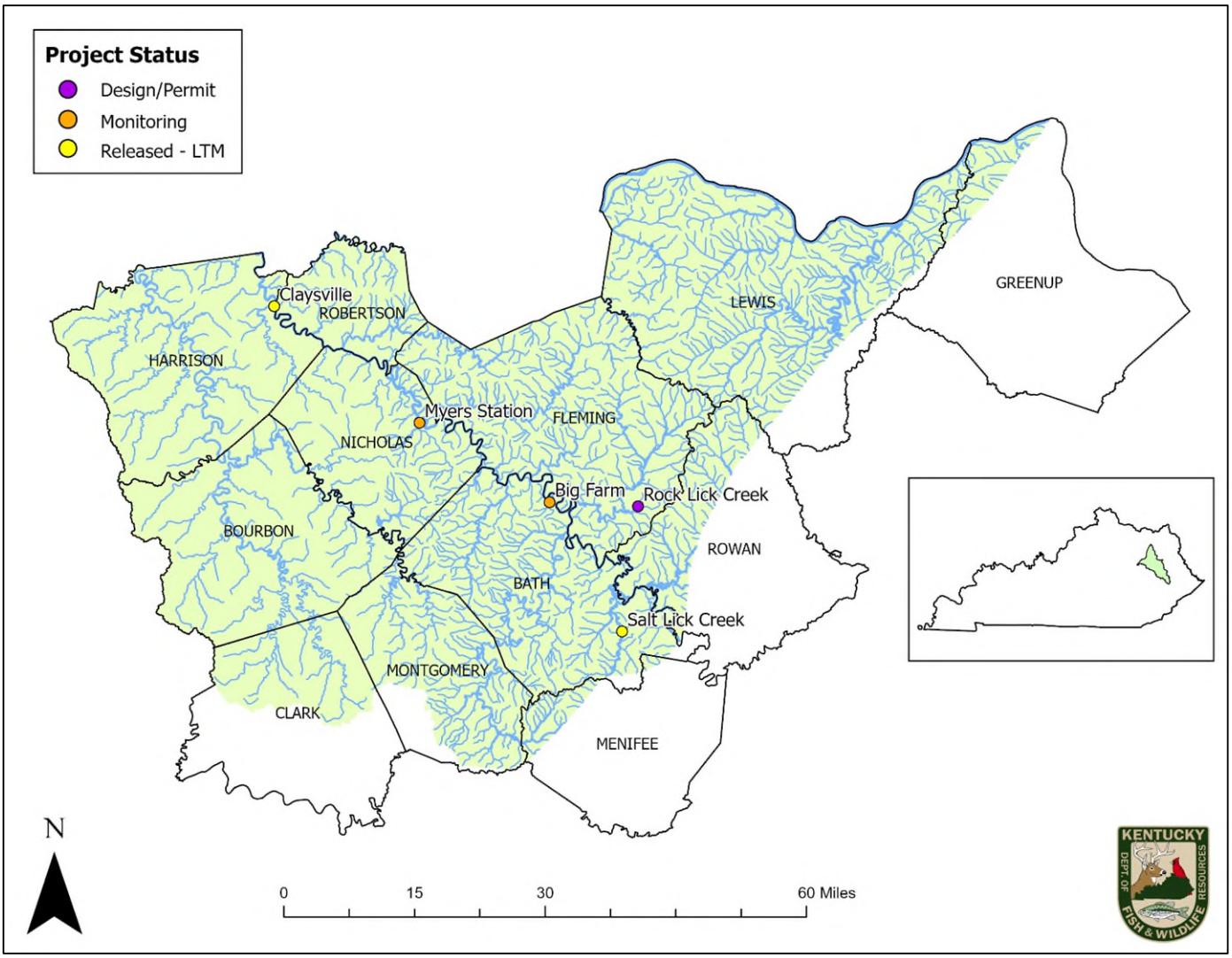
Table 38 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit, where the bulk of design and permitting processes occur. **Table 39** shows a subset of projects that are in this stage of development. For the Upper Licking River Service Area, the Broke Leg Creek project was delayed in 2021 due to difficulties with surveying the conservation easement boundary, landowner constraints for finalizing the SPI, and extensive investigations and regulatory discussions related to discovery of endangered Virginia Big-Eared bats onsite. Those issues were resolved in late 2023, and the project is proceeding ASAP, with possible construction starting late 2024. The Horse Mill project had problems with collecting topographical survey information causing design delays. Those issues are also now resolved. Both projects combined exceed the stream credit sales obligations for the service area. The Morgan Co. Extension Wetland project should have a complete permit application submitted in 2024 and should provide relatively more wetland credits than the amount obligated by sales in the service area.

Table 39: Project Status by Permit Milestone between SPI and Construction.

Project	Broke Leg	MEOW	Horse Mill	Slabcamp Branch
KDFWR Service Area	Upper Licking	Upper Licking	Upper Licking	Upper Licking
USACE LRL#/LRN#/MVM#	LRL-2016-00371	LRL-2018-00682	LRL-2018-00100	LRL-2018-00562
Section 7 Submittal	1/26/2024	7/8/2024	7/8/2024	tbd
Section 7 Concurrence	4/26/2024	Fall 2024	Fall 2024	tbd
Section 106 Submittal	1/22/2021	5/13/2024	11/18/2021	6/20/2022
Section 106 Concurrence	8/22/2022	10/17/2024	4/19/2022	7/13/2022
IRT Design Review Date	10/4/2019	3/30/2022	9/13/2021	11/2/2021
JD Site Visit	11/24/2020	3/30/2022	10/4/2021	11/3/2021
Design Review and PJD comments received	3/31/2020	5/18/2023	6/8/2022	6/8/2022
Draft MP Submittal	4/29/2021	Winter 2025	Winter 2025	tbd
Submit Pre-Filing Request	4/29/2021	Winter 2025	Winter 2025	tbd
401 Application Date	2/1/2024	Spring 2025	Spring 2025	tbd
401 FP Permit Received	2/12/2024	Summer 2025	Summer 2025	tbd
401 WQC Permit Received	3/21/2024	Summer 2025	Summer 2025	tbd
404 Application Date	1/26/2024	Winter 2025	Spring 2025	tbd
404 Permit Received	8/20/2024	Summer 2025	Fall 2025	tbd
Begin Construction	Winter 2025	Fall 2025	Winter 2026	tbd

Lower Licking River Service Area

Figure 18: Project Status in the Lower Licking River Service Area 2024



There are three active projects in this service area and two in the LTM phase. These projects are within the USACE Louisville District and the KAP region, which utilizes the AMU credit system (**Figure 18**). The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 100 AMU advanced wetland credits. **Table 41** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24 (**Table 42**).

Table 40 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 40 is

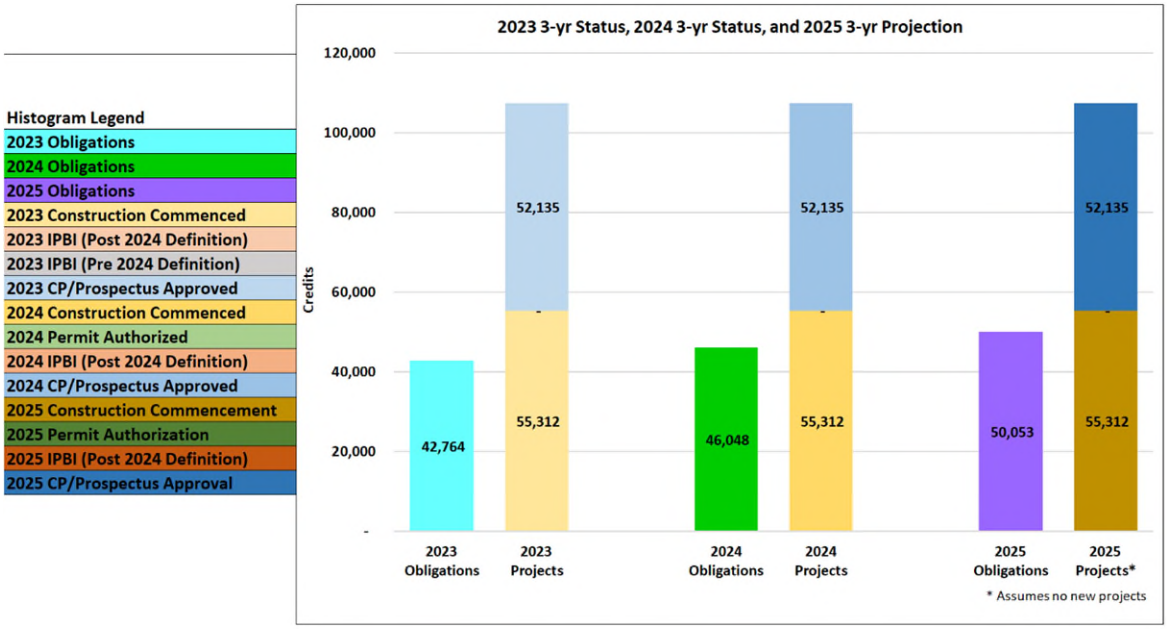
an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 19 shows the cumulative credit values of project by major milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 17 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

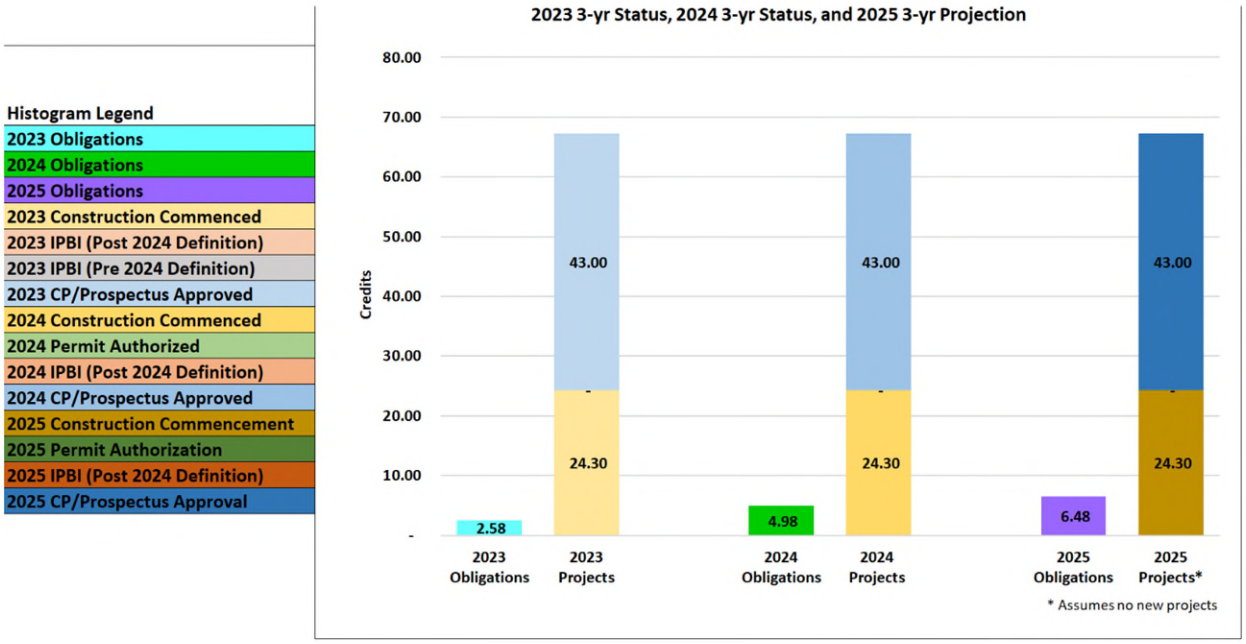
Table 40: Lower Licking Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00
2012	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00
2013	-	-	-	-	-	-
2014	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00
2015	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00
2015	-	-	-	-	-	-
2016	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72
2017	861.35	861.35	861.35	861.35	861.35	861.35
2017	-	-	-	-	-	-
2018	805.00	805.00	805.00	805.00	805.00	805.00
2018	725.00	725.00	725.00	725.00	725.00	725.00
2019	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00
2020	-	-	-	-	-	-
2020	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00
2021	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00
2022	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	593.00	593.00	593.00	593.00	593.00	593.00
Future		56,801.36	4,666.36	4,666.36	4,666.36	56,801.36
Total	50,646.07	107,447.43	55,312.43	55,312.43	55,312.43	107,447.43

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	0.980	0.980	0.98	0.98	0.98	0.98
2012	-	-	-	-	-	-
2013	-	-	-	-	-	-
2014	-	-	-	-	-	-
2015	-	-	-	-	-	-
2016	-	-	-	-	-	-
2017	-	-	-	-	-	-
2017	-	-	-	-	-	-
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	1.600	1.600	1.60	1.60	1.60	1.60
2020	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	2.400	2.400	2.40	2.40	2.40	2.40
2022	1.500	1.500	1.50	1.50	1.50	1.50
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	-	-	-	-	-	-
Future		60.820	17.82	17.82	17.82	60.82
Total	6.480	67.300	24.30	24.30	24.30	67.30

Figure 19: Lower Licking comparison of credit sales to project credit values, organized by year and by major milestones. Stream, then wetland.





Credit Costs, Balances and CY24 Activity

Table 41: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream AMU Regions	Lower Licking
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	207,453.93
CY2024 Credits Sold	593.00
CY2024 Released Credits*	-
CY2024 Ending Advance Stream AMU Balance	206,860.93

WETLAND AMUs	Lower Licking
Advance Credit Allocation	100.000
CY2024 Beginning Credit Balance	93.520
CY2024 Credits Sold	-
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	93.520

Table 42: Credit Costs in the Lower Licking Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2023	Ending CY2023	Beginning CY2023	Ending CY2023
Lower Licking (AMU)	490	490	78,000	78,000

In CY24, FILO sold no stream EIUs or wetland AMUs in the Lower Licking Service Area. Below is a list of active projects in the service area that have been designated LRL numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (
Table *45*).

Active Project Status

Big Farm, Bath County: The project was approved in 2014 and the 490-acre property was purchased in 2015. It is now part of the Clay Wildlife Management Area (WMA). In 2020, FILO constructed most of the project. Some repairs were needed due to large flood events in 2020-21. Repairs occurred late in 2021 with planting following, thus requiring an updated As-Built report. However, many of the repaired spots continued to degrade, and were subsequently repaired multiple times, resulting in strained communication with the contractor. The As-Built report was revised with anticipated submittal in early 2025. Active monitoring data collection commenced in 2021, but due to timing of events and changes caused by iterations of erosion and repairs, monitoring Year 1 is declared to be 2023. In 2023, FILO submitted the Year 3 (actually 1) Monitoring Report and will continue monitoring as originally planned. Warranty repairs completed by the original contractor were completed in early 2024. In 2023, FILO staff conducted maintenance activities which included invasive removal and supplemental tree plantings. FILO staff continued maintenance activities in 2024 by mapping trails and treating invasive species.

Table 43: Big Farm 2024 Maintenance Activities

Date	Staff	Action	Amount	Description
6/13/2024	WK, BW, AG, KS	Trail mapping	N/A	Mapped trails for FILO and consultant use as well as to promote public access.
12/2/2024	AG, JB, KS, JL, BW	Invasive treatment	5 gallons	Foliar sprayed 3% glyphosate via backpack sprayer to remove multiflora rose and bush honeysuckle from tributaries B01-B08.
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

Myers Station, Nicholas County: The 462-acre property was purchased in 2014 and became part of the Clay WMA. FILO submitted the Year 5 monitoring report in 2021. Some remedial actions are required on Coon Creek and Cassidy Creek in the southern portion of the property. The North side of the project is meeting success criteria goals and has been released by the IRT. The mainstems of Coon and Cassidy Creeks need re-design and repair which will likely be conducted via design and construction contracts starting in 2024, with design and AMP submittal anticipated in 2025

Rock Lick Creek, Fleming County: The project was approved in 2017. The site is on state-owned property known as Maxey Flats. The mitigation actions are purposed in the buffer property surrounding a capped hazardous waste landfill. In 2019 and 2020, FILO continued to collect survey data and design the project. In 2021, FILO conducted the Preliminary Design/JD and Assessment Verification meetings. In 2022 and 2023, FILO continued developing the design and Mitigation Plan. This project is low priority due to ample credit production for both stream and wetland credit by previous projects, therefore no action occurred in 2024.

LTM Project Status

Salt Lick Creek received planting in 2023 on the areas that were repaired in 2022. A brief remedial report was submitted to the IRT in December 2023. The site was viewed in 2024 for the repair warranty walkthrough with the contractor, and no remedial actions are needed as the site appears to be performing well. This site was released from monitoring by the IRT and will continue to be viewed as an LTM site.

Table 44: 2024 LTM Actions in the Lower Licking River Service Area

Project Name	Date Visited	Easement	Stability	Notes
Salt Lick Creek	1/17/2023	Good	Action Completed	Repair areas received remedial planting.

Table 45: Project Status in the Lower Licking River Service Area

Count	Project	Status	County	USACE District	404 Permit #
1	Rock Lick Cr	Design/Permit	Fleming	Louisville	LRL-2016-393
2	Big Farm	Monitoring - YR 1	Bath	Louisville	LRL-2014-209-pgj
3	Myers Station	Partial Release Pending	Nicholas	Louisville	LRL-2012-637-pgj
4	Salt Lick Cr	Released - Long Term Management	Bath	Louisville	LRL-2011-891-pgj
5	Claysville	Released - Long Term Management	Bath	Louisville	LRL-2011-891-pgj
1	Martin Mill Branch	Approved - Terminated	Fleming	Louisville	LRL-2014-443-pgj
2	Greasy Cr	Approved - Terminated	Robertson	Louisville	NA

Table 45 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit, where the bulk of design and permitting processes occur. **Table 46** shows a subset of projects that are in this stage of development. For the Lower Licking River Service Area, constructed projects exceed the credit sales for streams and wetlands. As such there is only one project currently between SPI and construction milestones. The Rock Lick Creek project will create both stream and wetland credits, but due to the status of credit production in the service area, has been lowered in priority to assist with focus on service areas in greater urgent need.

Table 46: Project Status by Permit Milestone between SPI and Construction.

Project	Rock Lick Creek (and Drip Springs)
KDFWR Service Area	Lower Licking
USACE LRL#/LRN#/MVM#	LRL-2016-00393.pgj
Section 7 Submittal	3/29/2023
Section 7 Concurrence	Spring 2025
Section 106 Submittal	NA
ection 106 Concurrence	NA
IRT Design Review Date	12/7/2021
JD Site Visit	12/8/2021
Design Review and PJD comments received	3/14/2022
Draft MP Submittal	tbd
ubmit Pre-Filing Request	tbd
401 Application Date	tbd
401 FP Permit Received	tbd
01 WQC Permit Received	tbd
404 Application Date	tbd
404 Permit Received	tbd
Begin Construction	tbd

Upper Kentucky River Service Area

Figure 20: Project Status in the Upper Kentucky River Service Area 2024

There are six active projects in this service area and seven in the LTM phase. These projects are within the USACE Louisville District and the EKSAP region, which utilizes the EIU credit system (**Figure 20**). The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 100 AMU advanced wetland credits. **Table 48** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24 (**Table 49**).

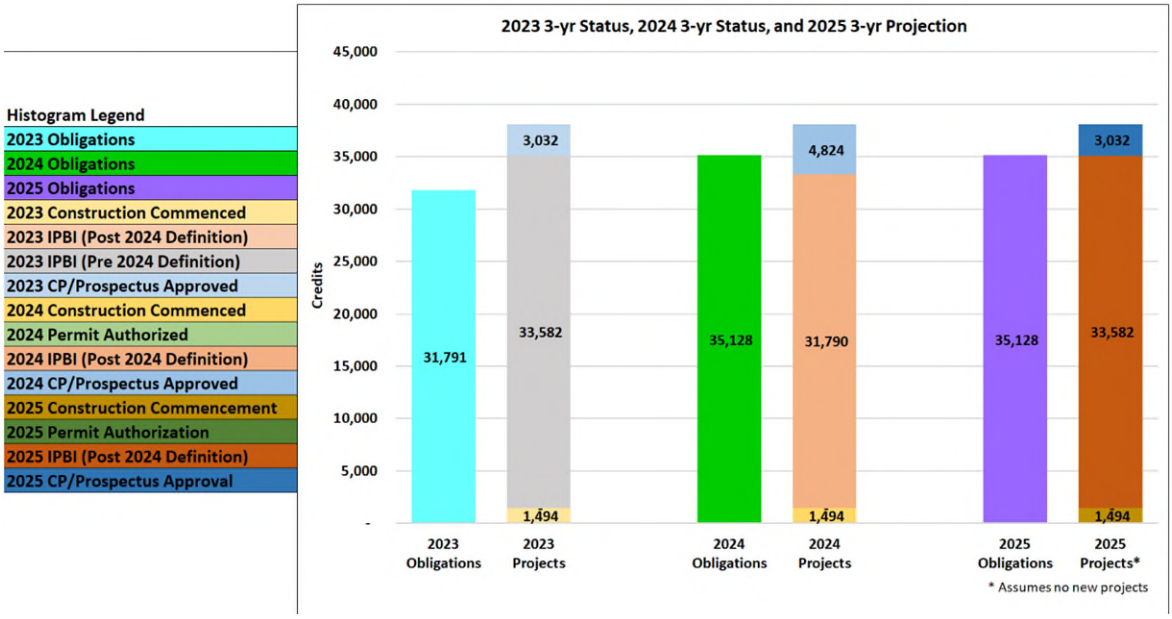
Table 47 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 47 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 21 shows the cumulative credit values of project by major milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 21 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

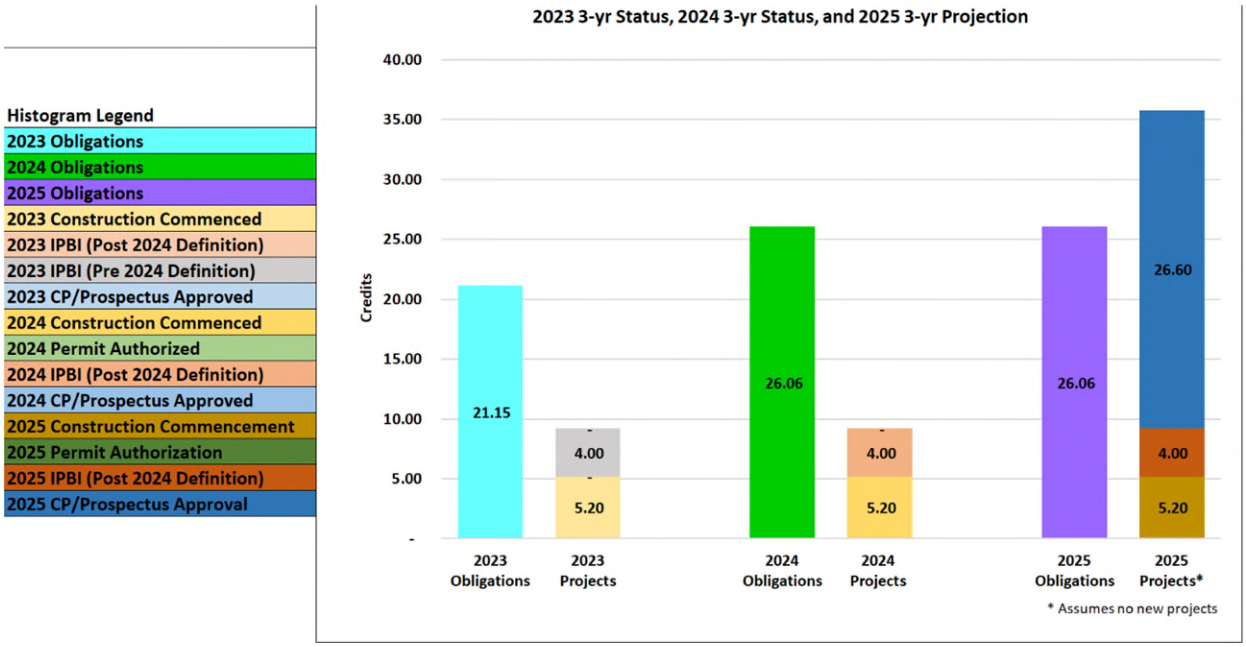
Table 47: Upper Kentucky Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	-	-	-	-	-	-
2012	2,349.86	2,349.86	1,494.00	1,494.00	2,349.86	2,349.86
2013	999.13	999.13	-	-	999.13	999.13
2014	2,037.17	2,037.17	-	-	2,037.17	2,037.17
2015	965.86	965.86	-	-	965.86	965.86
2016	7,398.89	7,398.89	-	-	7,398.89	7,398.89
2017	5,368.72	5,368.72	-	-	5,368.72	5,368.72
2017	-	-	-	-	-	-
2018	1,648.00	1,648.00	-	-	1,648.00	1,648.00
2018	1,296.00	1,296.00	-	-	1,296.00	1,296.00
2019	9,093.00	9,093.00	-	-	9,093.00	9,093.00
2020	-	-	-	-	-	-
2020	634.00	634.00	-	-	634.00	634.00
2021	3,337.00	3,337.00	-	-	1,493.37	3,337.00
2022	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	-	-	-	-	-	-
Future		2,979.97	-	-	-	2,979.97
Total	35,127.63	38,107.60	1,494.00	1,494.00	33,284.00	38,107.60

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	-	-	-	-	-	-
2012	-	-	-	-	-	-
2013	1.200	1.200	1.20	1.20	1.20	1.20
2014	-	-	-	-	-	-
2015	-	-	-	-	-	-
2016	3.300	3.300	3.30	3.30	3.30	3.30
2017	8.950	8.950	0.70	0.70	4.70	4.70
2017	-	-	-	-	-	-
2018	2.100	2.100	-	-	-	-
2018	-	-	-	-	-	-
2019	5.200	5.200	-	-	-	-
2020	0.400	0.400	-	-	-	-
2020	-	-	-	-	-	-
2021	4.910	4.910	-	-	-	-
2022	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	9.400	9.400	-	-	-	-
Future		0.340	-	-	-	-
Total	35.460	35.800	5.20	5.20	9.20	9.20

Figure 21: Upper Kentucky comparison of credit sales to project credit values, organized by year and by major milestones. Stream credits, then wetland.





Credit Costs, Balances and CY24 Activity

Table 48: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream EIU Regions	Upper Kentucky
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	205,327.37
CY2024 Credits Sold	-
CY2024 Released Credits	-
CY2024 Ending Advance Stream EIU Balance	205,327.37

WETLAND AMUs	Upper Kentucky
Advance Credit Allocation	100.000
CY2024 Beginning Credit Balance	73.940
CY2024 Credits Sold	9.400
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	64.540

Table 49: Credit Costs in the Upper Kentucky Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Upper Kentucky (EIU)	930	930	78,000	78,000

In CY24, FILO sold no stream EIUs or wetland AMUs in the Upper Kentucky Service Area. FILO staff continued their efforts in locating potential project sites, specifically wetlands, in the Upper Kentucky River Service Area through various landowner contacts, realtors and

consultants. Several potential project sites, Red Lick Wetland IV, Teague's Creek, and McKinny property were assessed for potential restoration by FILO staff in CY24.

Below is a list of active projects in the service area that have been designated LRL numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 53**).

Active Project Status

East Fork Indian Creek, Menifee County: The project is in the Daniel Boone National Forest, with permanent protection provided by the U.S. Forest Service (USFS) Management Plan. In 2019, FILO staff planted additional container trees to improve woody stem density and diversity. There are some areas identified for repairs as noted in the 2019 report and during field visits. FILO initiated a repair plan, with a contract awarded in November 2020. The Year 5 monitoring report was submitted in December 2020. The construction repair effort was completed in December 2021, with the planting effort completed in early 2022. The IRT conducted a site inspection in fall 2022 and determined a minimum of two years post repair monitoring will continue. Monitoring was completed in 2022-2024 with report submittal to the IRT. FILO monitored the site in 2024 and wishes to discuss monitoring release with the IRT in 2025. The site repairs continue to perform well.

Ross Creek 1 & 2, Lee and Estill Counties: The project is adjacent to the USFS Daniel Boone National Forest, the Kentucky River, and several private properties. The 640-acre property was purchased in 2014. In 2020, FILO completed construction of the project. The As-Built report was submitted in May 2021. The Year 4 monitoring report was submitted in 2024. Some deficiencies on the site exist and an adaptive management plan (AMP) is under development by a design consultant. The repair design concept will be presented to the IRT in an AMP prior to implementation. Also in 2024, FILO staff treated invasive species, detailed in the table below. The AMP anticipated submittal time frame is early 2025.

Table 50: Ross Creek 1 & 2 2024 Maintenance Activities

Date	Staff	Action	Amount	Description
10/10/2024	AG, KS	Invasive treatment	13 gallons	Foliar sprayed 3% glyphosate with backpack and UTV sprayers. Species targeted: Knotweed and Kudzu
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

Ross Creek 3, Lee County: The project is adjacent to Ross 1 and 2 and consists mostly of Kentucky River and small headwater preservation. This project was approved by the IRT in 2017. In 2019, FILO purchased the 290-acre property. In 2022 and 2023, FILO conducted surveys for the Biological Assessment for Section 7 of the Endangered Species Act and the

Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act. In 2024, FILO submitted a Phase 1 Archaeology Report and Cultural Resources Report for Section 106 of the National Historic Preservation Act.

Ross Creek 5 & 6, Lee County: An on-site IRT visit was conducted in 2020, and it received IRT mitigation approval. In 2023, the landowner for Ross 6 hired an attorney and resolved the title issues on the property. Ross 6 is contiguous with Ross 1, 2, & 3, which together with Ross 3 will make a project size that will be more economical for contracting in such a remote location. In 2024, the landowner of Ross 5 decided to wait on selling us the 26-acre tract of Ross 5. Also in 2024, FILO completed the boundary survey on a major portion of the Ross 6 property and expects to purchase those portions in early 2025.

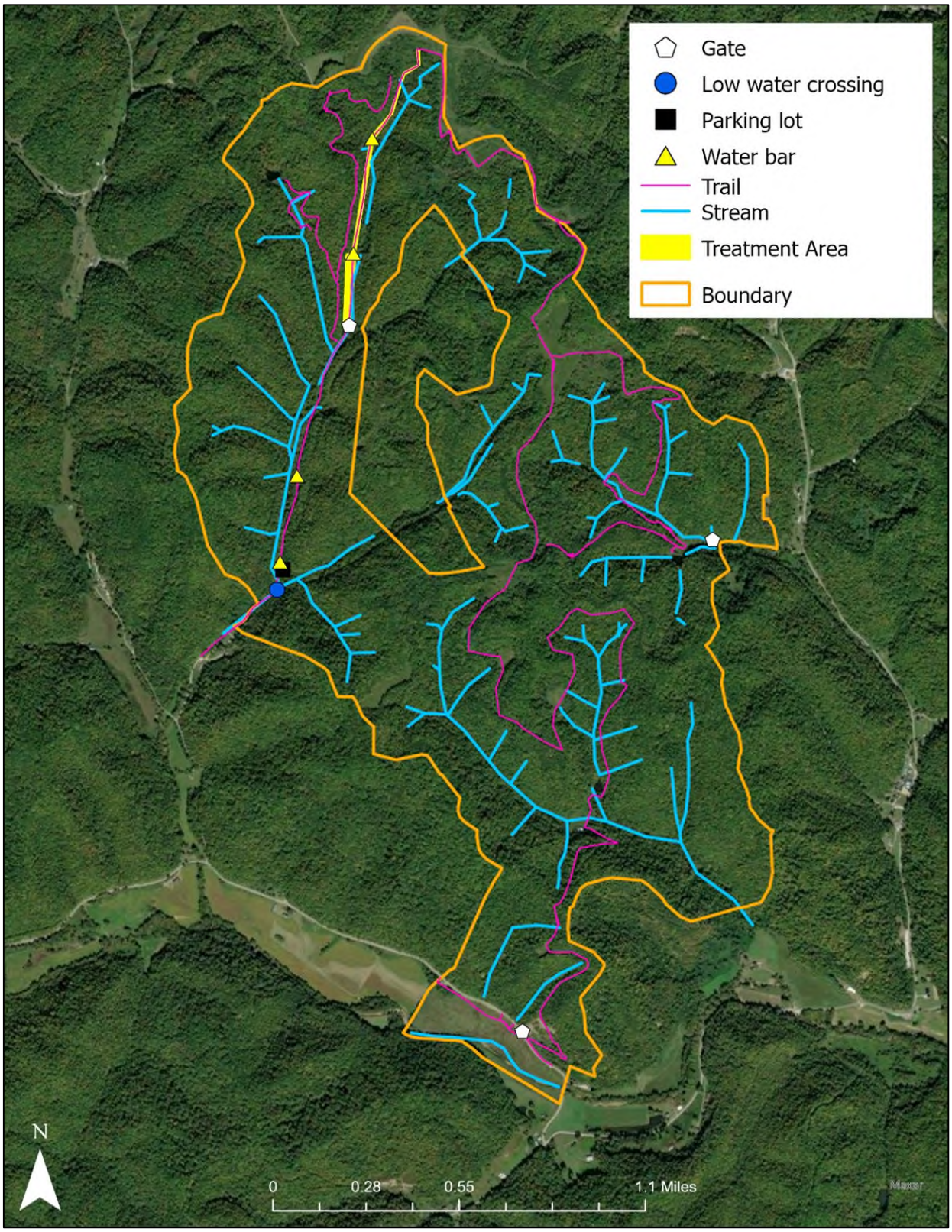
Little Sexton Creek, Jackson and Clay Counties: This project was approved by the IRT in 2019. In 2021, FILO acquired the 1,112-acre property, collected field data for design, collected field data for a Biological Assessment for Section 7 of the Endangered Species Act, and conducted the Preliminary Design/JD and Assessment Verification meetings. In 2022, design and mitigation plans continued for most of the project, and FILO proposed an alternative mitigation approach for drainage B to the IRT. In 2023, Drainage B alternative approach conversations continued, design and mitigation plans progressed, and FILO started collecting additional field data for the Biological Assessment. In 2024, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and continued developing the design and Mitigation Plan. Also in 2024, FILO staff continued IPBI invasive removal, focusing mainly on autumn olive (*Elaeagnus umbellate*) along with the construction of a low water crossing, a parking lot, and water bars. Trails were also marked and cleared for easier access to the site.

Table 51: Little Sexton Creek 2024 IPBI/Maintenance Activities

Date	Staff	Action	Amount	Description
6/11/2024	WK, BW, AG	Water bars	4 water bars	Mapped trails and marked where water bars would be built. Then built water bars to reduce sedimentation and erosion.
6/26/2024	KS, AG, BW, WK	Trail mapping	N/A	Ran trails with the UTV and marked them on Field Maps.
6/26/2024	KS, AG, BW, WK	Invasive treatment	12 gallons	Foliar sprayed 3% glyphosate via 25-gallon UTV sprayer. Species targeted: Autumn olive, Multiflora rose, Kudzu, and Bradford pear.
7/23/2024	KS, BW, WK	Parking lot tarps	N/A	Laid tarps for the parking lot.
7/23/2024	KS, BW, WK	Trail mapping	N/A	Ran trails with the UTV and marked them on Field Maps.
7/23/2024	KS, BW, WK	Invasive treatment	11 gallons	Foliar sprayed 3% glyphosate via 25-gallon UTV sprayer. Species targeted: Autumn olive, Multiflora rose, Kudzu, and Bradford pear.

7/25/2024	AG, KS	Seeding	N/A	Seeded around the recently constructed parking lot.
8/1/2024	BW, AG, KS	Parking lot	1 parking lot	Laid down 146 tons of gravel to build parking lot to limit unauthorized trespass and promote public access.
8/5/2024	KS, AG, BW	Parking lot	1 parking lot	Laid down 146 tons of gravel to build parking lot to limit unauthorized trespass and promote public access.
9/24/2025	KS, AG, JB, BW	Low water crossing	1 low water crossing	Placed 16 tons of boulders along low water crossing.
9/25/2024	KS, AG, JB, BW	Low water crossing	1 low water crossing	Placed 16 tons of boulders along low water crossing.
11/14/2024	JB, JB, AG, KS, BW	Gate and signs	1 gate	Added temporary wire gate to new entrance with signs.
11/19/2024	JB, JB, AG, KS, BW	Gate and signs	1 gate	Added temporary wire gate to one of the trails with signs.
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

Figure 22: Little Sexton Creek 2024 IPBI/Maintenance Area



LTM Project Status

There were no LTM activities required in the Upper Kentucky River Service Area in 2024, but minor instabilities were noted at Terry's Branch that will be addressed in 2024. **Table 52** below describes the LTM site visits that occurred in 2024.

Table 52: 2023 LTM Actions in the Upper Kentucky River Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Upper Kentucky	Ball Fork	NA	Good	Good	Project visited and no actions needed
Upper Kentucky	Bullskin Creek	9/28/2023	Good	Good	Project visited and no actions needed
Upper Kentucky	Elisha Creek	9/28/2023	Good	Good	Project visited and no actions needed
Upper Kentucky	Guy Cove	NA	Good	Good	Project visited and no actions needed
Upper Kentucky	Red Lick	4/13/2023	Good	Good	Project visited and no actions needed
Upper Kentucky	Terry's Branch	NA	Good	Action Required	Site wide repairs needed. Assessment and repairs planned for 2024
Upper Kentucky	Southeast Community	9/28/2023	Good	Good	Project visited and no actions needed

Table 53: Project Status in the Upper Kentucky River Service Area

Count	Project	Status	County	USACE Distrct	404 Permit #
1	Ross Cr #5	CP Approved	Lee	Louisville	LRL-2020-288
2	Ross Cr #6	CP Approved	Lee	Louisville	LRL-2020-326
3	Little Sextons Creek	Design/Permit	Jackson	Louisville	LRL-2018-00981-pgj
4	Ross Cr #3	Design/Permit	Lee	Louisville	LRL-2017-00042
5	Ross Cr #1 & #2	Monitoring - YR 3	Lee	Louisville	LRL-2013-143
6	E Fk Indian Cr	Release Pending	Menifee	Louisville	LRL-2012-273
7	Elisha Cr	Released - Long Term Management	Leslie	Louisville	LRL-2011-404-pgj
8	Balls Fork	Released - Long Term Management	Knott	Louisville	2002-01447
9	Bullskin Cr	Released - Long Term Management	Leslie	Louisville	200500205-pgj
10	Guy Cove (Laurel Fork)	Released - Long Term Management	Breathitt	Louisville	LRL-2007-615
11	Red Lick Cr	Released - Long Term Management	Estill	Louisville	LRL-2005-131-lad
12	SECC Bank Stabilization	Released - Long Term Management	Letcher	Louisville	LRL-2005-1004-the
13	Terrys Br	Released - Long Term Management	Knott	Louisville	200500205
1	Upper Cane Creek	Approved - Terminated	Menifee	Louisville	LRL-2009-433-pgj
2	Frozen Creek	Approved - Terminated	Breathitt	Louisville	-
3	Hinton Branch	Approved - Terminated	Estill	Louisville	-
4	North Fork Ky River	Approved - Terminated	Perry	Louisville	-
5	Red Lick #2	Approved - Terminated	Estill	Louisville	-
6	Holly Fork	Approved - Terminated	Owsley	Louisville	LRL-2015-1020-pgj
7	Sand Lick	Approved - Terminated	Powell	Louisville	-
8	Troublesome Cr	Approved - Terminated	Perry	Louisville	-
9	Persimmon Hollow	Approved - Terminated	Leslie	Louisville	-
10	Doe Creek I	Approved - Terminated	Owsley	Louisville	LRL-2019-00182
11	Doe Creek II	Approved - Terminated	Owsley	Louisville	LRL-2019-01051
12	Anderson Branch	Approved - Terminated	Powell	Louisville	LRL-2019-00437
13	Middle Fork Cane Cr	Approved - Terminated	Powell	Louisville	LRL-2015-583-pgj
14	Muir Valley	Approved - Terminated	Wolfe	Louisville	LRL-2016-1060
15	Ross Cr #4	Approved - Terminated	Estill	Louisville	LRL-2019-563
16	Frozen Creek	Approved - Terminated	Breathitt	Louisville	LRL-2022-00456
17	Red Lick Wetland	Approved - Terminated	Estill	Louisville	LRL-2022-1026

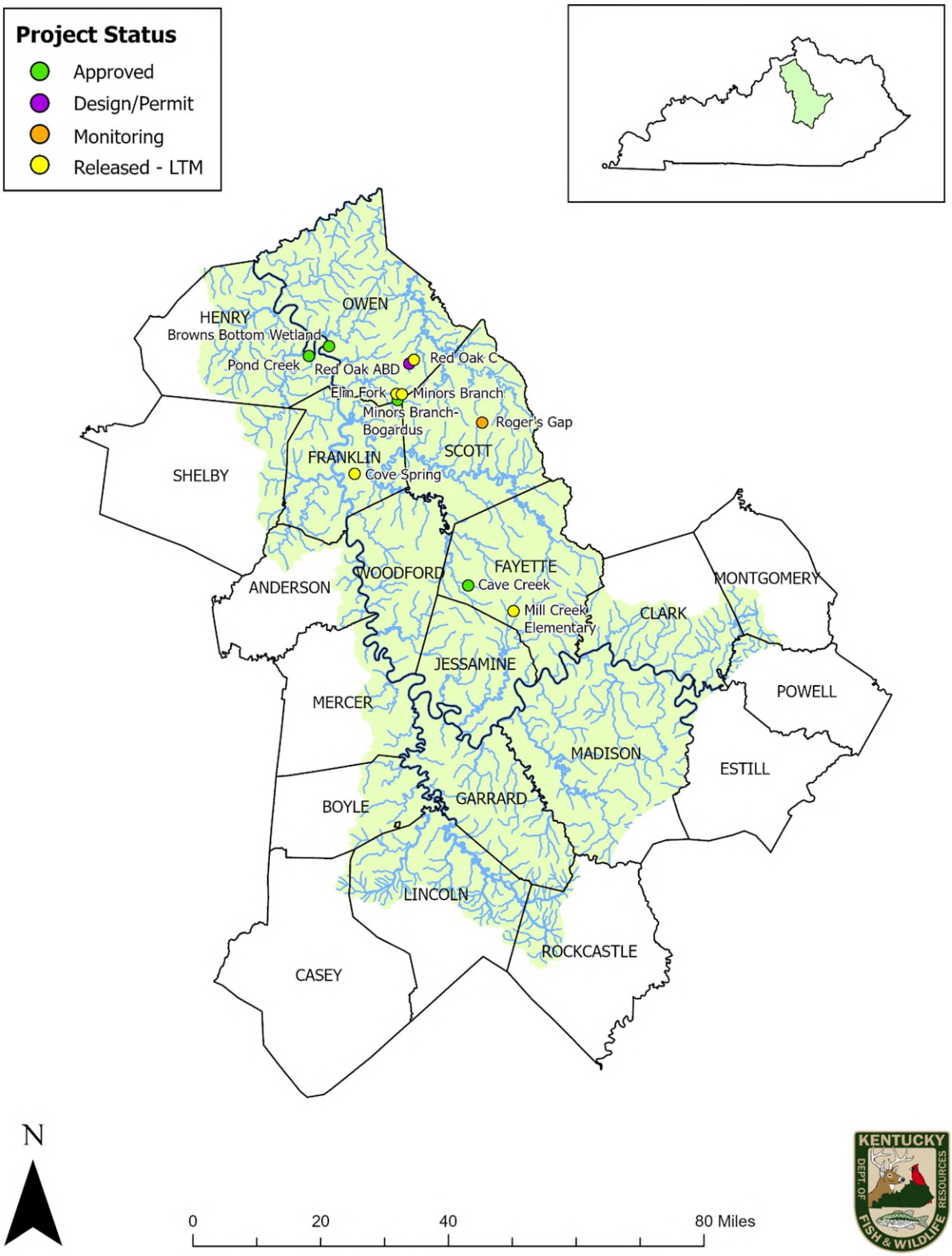
Table 53 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit, where the bulk of design and permitting processes occur. **Table 54** shows a subset of projects that are in this stage of development. For the Upper Kentucky River Service Area, there are several projects with IRT CP approval, however those projects have proven difficult to resolve title issues to complete the SPIs. Two projects, Ross 5 & 6 are intended to be combined for processing with Ross 3. However, the Little Sexton's Creek project is proceeding, and is expected to exceed the remaining credit sales obligation for stream credits, and has a wetland component as well, though falling short of current service area needs.

Table 54: Project Status by Permit Milestone between SPI and Construction.

Project	Ross Creek 6	Little Sextons Creek
KDFWR Service Area	Upper Kentucky	Upper Kentucky
USACE LRL#/LRN#/MVM#	LRL-2020-00326	LRL-2018-00981.pgj
Section 7 Submittal	tbd	2/28/2024
Section 7 Concurrence	tbd	2/10/2025
Section 106 Submittal	tbd	NA
Section 106 Concurrence	tbd	NA
IRT Design Review Date	tbd	10/28/2021
JD Site Visit	tbd	9/28/2021
Design Review and PJD comments received	tbd	12/29/2021
Draft MP Submittal	tbd	Winter 2025
Submit Pre-Filing Request	tbd	Winter 2025
401 Application Date	tbd	Spring 2025
401 FP Permit Received	tbd	Summer 2025
401 WQC Permit Received	tbd	Summer 2025
404 Application Date	tbd	Spring 2025
404 Permit Received	tbd	Fall 2025
Begin Construction	tbd	Winter 2026

Lower Kentucky River Service Area

Figure 23: Project Status in the Lower Kentucky River Service Area 2024



There are seven active projects in this service area and four in LTM phase. These projects are within the USACE Louisville District and the KAP region, which utilizes the AMU credit system (**Figure 19**). The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 100 AMU advanced wetland credits. **Table 56** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24 (**Table 57**).

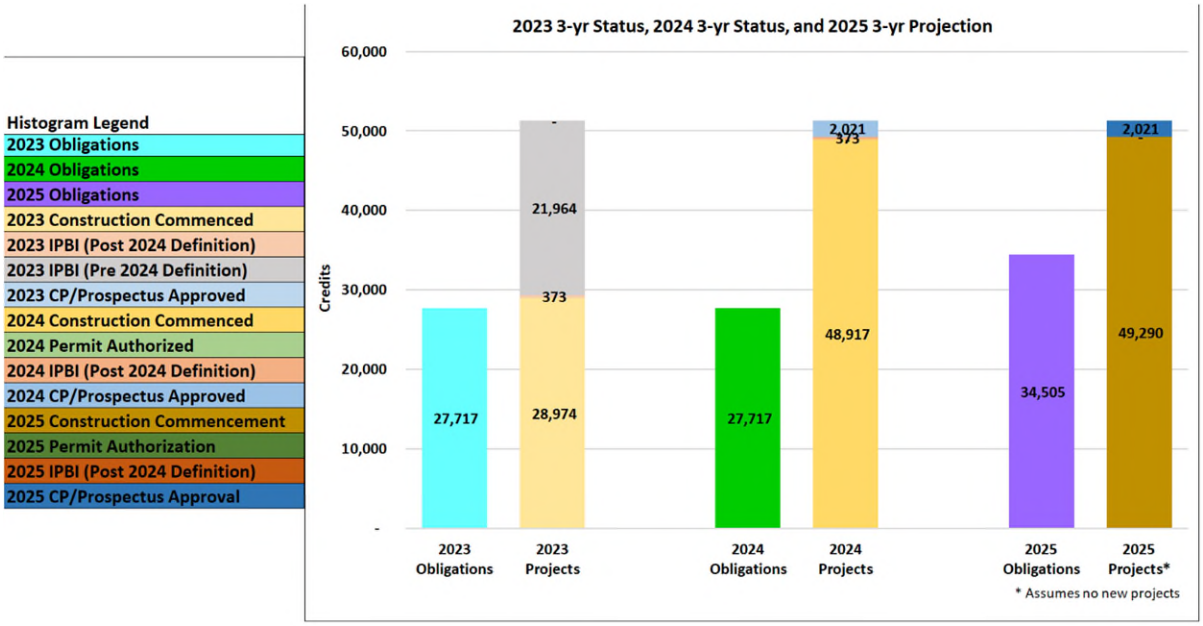
Table 55 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 55 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 24 shows the cumulative credit values of project by major milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 24 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

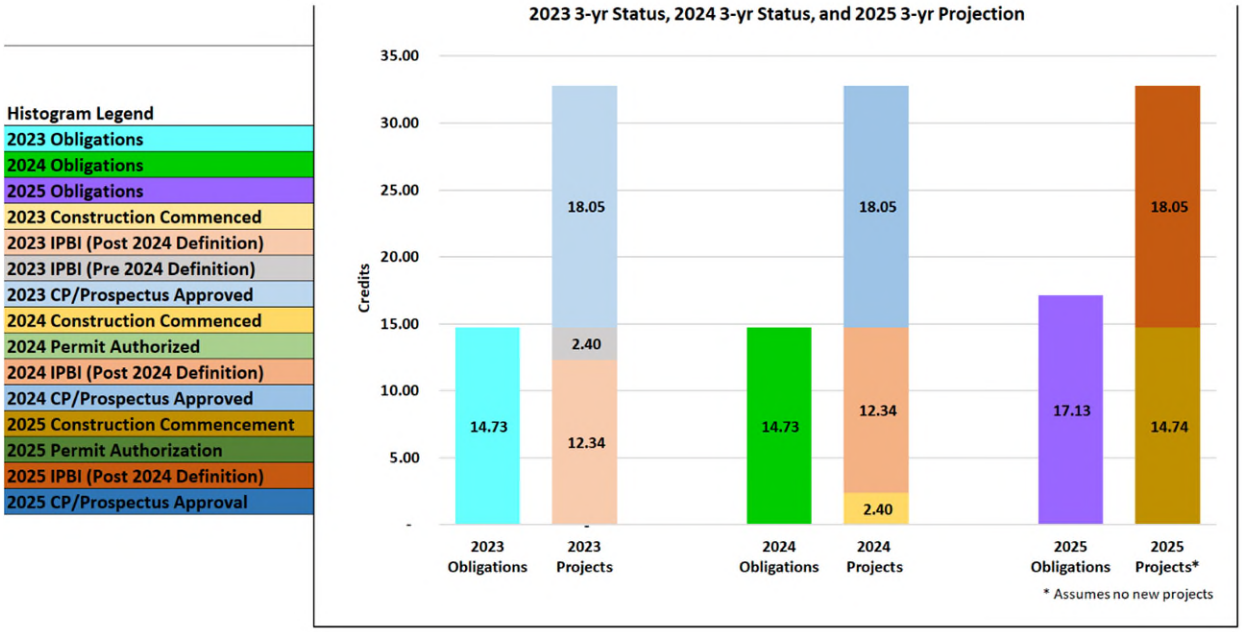
Table 55: Lower Kentucky Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	-	-	-	-	-	-
2012	807.00	807.00	807.00	807.00	807.00	807.00
2013	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20
2014	606.00	606.00	606.00	606.00	606.00	606.00
2015	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00
2016	409.00	409.00	409.00	409.00	409.00	409.00
2017	883.00	883.00	883.00	883.00	883.00	883.00
2017	240.00	240.00	240.00	240.00	240.00	240.00
2018	618.00	618.00	618.00	618.00	618.00	618.00
2018	586.00	586.00	586.00	586.00	586.00	586.00
2019	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00
2020	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00
2020	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00
2021	-	-	-	-	-	-
2022	1,468.00	1,468.00	1,468.00	1,468.00	1,468.00	1,468.00
2022	5,320.00	5,320.00	5,320.00	5,320.00	5,320.00	5,320.00
2023	3,068.00	3,068.00	3,068.00	3,068.00	3,068.00	3,068.00
2024	231.20	231.20	231.20	231.20	231.20	231.20
Future		13,506.60	11,112.60	11,112.60	11,485.60	13,506.60
Total	37,804.40	51,311.00	48,917.00	48,917.00	49,290.00	51,311.00

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	1.800	1.800	1.80	1.80	1.80	1.80
2012	1.032	1.032	0.60	0.60	1.03	1.03
2013	3.170	3.170	-	-	3.17	3.17
2014	0.400	0.400	-	-	0.40	0.40
2015	2.120	2.120	-	-	2.12	2.12
2016	1.310	1.310	-	-	1.31	1.31
2017	-	-	-	-	-	-
2017	0.300	0.300	-	-	0.30	0.30
2018	0.300	0.300	-	-	0.30	0.30
2018	1.800	1.800	-	-	1.80	1.80
2019	1.100	1.100	-	-	1.10	1.10
2020	0.900	0.900	-	-	0.90	0.90
2020	0.500	0.500	-	-	0.50	0.50
2021	-	-	-	-	-	-
2022	0.400	0.400	-	-	0.01	0.40
2022	2.000	2.000	-	-	-	2.00
2023	-	-	-	-	-	-
2024	0.400	0.400	-	-	-	0.40
Future		15.258	-	-	-	15.26
Total	17.532	32.790	2.40	2.40	14.74	32.79

Figure 24: Lower Kentucky comparison of credit sales to project credit values, organized by year and by major milestones. Stream credits, then wetland.





Credit Costs, Balances and CY24 Activity

Table 56: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream AMU Regions	Lower Kentucky
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	212,668.80
CY2024 Credits Sold	231.20
CY2024 Released Credits*	18,453.00
CY2024 Ending Advance Stream AMU Balance	230,890.60

WETLAND AMUs	Lower Kentucky
Advance Credit Allocation	100.000
CY2024 Beginning Credit Balance	82.868
CY2024 Credits Sold	0.400
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	82.468

*Lower Kentucky releases are Corps approved adjustments

Table 57: Credit Costs in the Lower Kentucky Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Lower Kentucky (AMU)	395	395	78,000	78,000

In CY24, FILO sold 395 stream EIUs in the Lower Kentucky Service Area contributing less than 5% of total receipts received from all service areas. In-lieu-fee payments to FILO from mitigation impacts caused by 404-permitted activities including impact types and the amounts are included in **Table 58**. Full or partial disclosure of records concerning funds can be requested through the Freedom of Information Act (FOIA).

Table 58: Receipts for Purchased Credits including Impact Types

Receipts - type of payment	Amount	Service Area	County	Stream / Wetland	Credits	Perennial Credits	Intermittent Credits	Ephemeral Credits	Wetland Credits
municipal	$ 31,200.00	LK	Henry	W	0.4				0.4
other	$ 11,122.05	LK	Fayette	S	28.2				
other	$ 80,073.71	LK	Owen	S	203.0				

FILO staff continued their efforts in locating potential project sites in the Lower Kentucky River Service Area. Below is a list of active projects in the service area that have been designated LRL numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 64**).

Active Project Status

Minors Creek, Owen County: The 309-acre property was purchased in 2014 and is now a part of the Kleber WMA. Construction began in the fall of 2017 and continued throughout 2018 with completion and final planting in early 2019. The As-Built survey and first year of monitoring were completed in 2019 with reports submitted in December 2019. The five-year monitoring report was submitted in December 2023. A credit release request will be determined based on performance standards met. In 2023, FILO staff conducted maintenance invasive treatment, described in the table below. A compliance inspection was conducted in 2024. The site is currently released from monitoring and will be managed as a LTM site.

Minors Creek II, Owen County: In 2017, FILO purchased the 70-acre property, as headwater protection for the Minors Creek Mitigation Project. A concept plan for additional headwater mitigation was approved in 2021. No additional progress occurred in 2022 or 2023, but FILO staff did conduct IPBI invasive treatment in 2023. In 2024, the virtual Mitigation Plan meeting was conducted and will be submitted in 2025.

Pond Creek, Owen County: The project is on the Chesney Tract of the Kentucky River WMA. It was approved in 2015, and the design started the same year but was later paused for cost concerns. Since then, FILO has continued IPBI activities such as management restrictions, removal of overhead utilities and live-stake propagation. In 2022, FILO re-initiated a design consultation to consider a different approach to account for current site conditions. In 2024, FILO continued developing concept design approaches and started developing the Mitigation Plan. This development continued into 2024 along with the installation of several wetland wells, detailed below.

Table 59: Pond Creek 2024 Maintenance Activities

Date	Staff	Action	Amount	Description
10/22/2024	LC, BW, BWM, AS, JB, KS	Wetland wells	1 barometric well 3 troll wells	Installed wetland wells for pre-construction monitoring.
10/23/2024	BW, AS, JB, AG, KS, KG	Wetland wells	6 troll wells	Installed wetland wells for pre-construction monitoring.
10/24/2024	AS, BW, JB, AG, KS	Wetland wells	3 troll wells	Installed wetland wells for pre-construction monitoring.

Red Oak Creek Drainage C, Owen County: The project was approved in 2014 and was purchased in 2015. The 601-acre property was added to the Dr. James Rich WMA and design began in 2016. In 2017, FILO received the 401 Water Quality Certification and submitted the 404-permit application. In 2018, FILO received the 404 permit and began construction. Final completion occurred in early 2019 with the As-Built and year one monitoring report submitted in December 2019. The five-year monitoring report was submitted in December 2023. A compliance visit was held in 2024, and the project was released with some credits withheld due to the IRT's definition of ordinary highwater mark (OHWM). The site will be visited annually at a minimum for LTM actions.

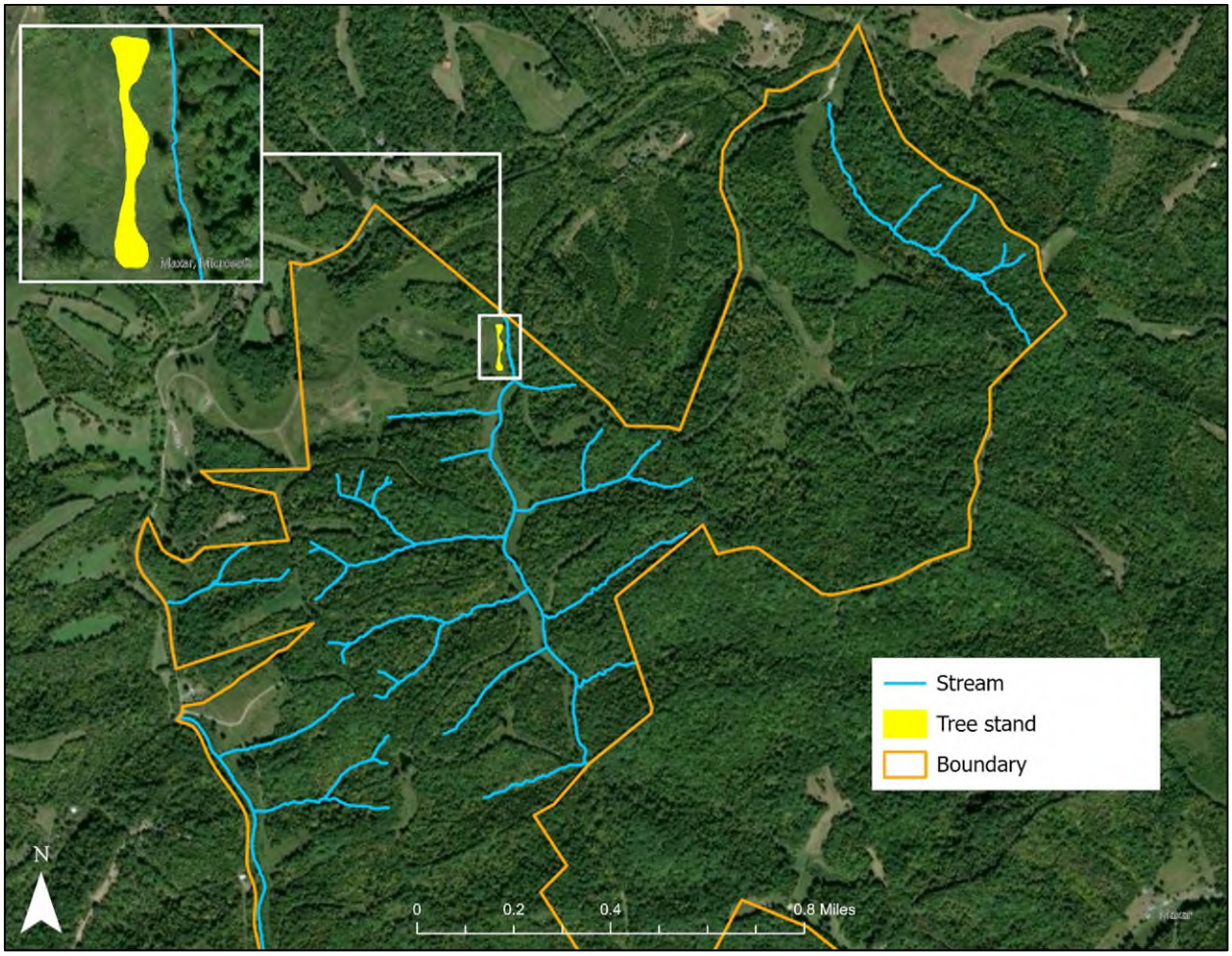
Red Oak Drainage A, B, and D, Owen County: The project was approved in 2014 and was purchased in 2015. The 601-acre property was added to the Dr. James Rich WMA. In 2020, FILO began design and Mitigation Plan development. In 2022, FILO submitted a Biological Assessment for Section 7 of the Endangered Species Act and continued developing the Mitigation Plan and design. In 2024, FILO resubmitted the Biological Assessment and received Section 7 concurrence. Also in 2024, FILO finalized the Mitigation Plan and applied for and received the KDOW Floodplain Permit, 401 Water Quality Certification, and 404 Department of Army Permit. FILO plans to advertise the project for construction bidding and begin construction in 2025. Also in 2024, IPBI efforts continued with the creation of a .25-acre tree stand in Drainage B that was excavated and planted by FILO staff. New signs were also added, and the activities are detailed in the table and figure below.

Table 60: Red Oak Drainage B 2024 IPBI/Maintenance Activities

Date	Staff	Action	Amount	Description
11/20/2024	BW,JB,KS,AG,JL	Tree-stand creation	.08 acres	Excavated an area to create a willow stand.
11/20/2024	KS, JL, JB, BW	Sign installation	2 signs	Installed two "Project Coming Soon" signs at the parking lots.
11/21/2024	BW,JB,KS,AG,JL	Tree-stand creation	.08 acres	Excavated an area to create a willow stand.

11/22/2024	BW,JB,KS,AG,JL	Tree-stand creation	.09 acres	Excavated an area to create a willow stand.
12/11/2024	JB, JL, KS, BW	Tree planting	23 holes	Dug holes for planting ball and burlap trees at specified areas.
12/17/2024	BW, JL	Tree planting	13 trees	Planted 13 ball and burlap trees in previously dug holes.

Figure 25: Red Oak Tributary B 2024 IPBI/Maintenance Area



** Boundary outline is zoomed in to treated area

Roger's Gap, Scott County: The project included the acquisition of 2,500 acres containing approximately 28 miles of stream channel. The design-build started in 2013, and construction was completed in 2016. FILO submitted the Year Two Monitoring Report in 2018. In 2019, a request was made to the IRT to construct an office and enclosed shooting range in the southern portion of the Veterans WMA (Roger's Gap) property. Since this is considered a land use change, IRT consultation was required and approved in an email from the Louisville District USACE on September 11, 2019. The email was filed in our records. In early 2020, an extensive planting effort occurred across the site with installation of 15,500 live stakes and over 300

container trees. The four-year monitoring report was submitted in December 2020 to document this effort. The five-year monitoring report was submitted in December 2021. FILO intends to request monitoring release on portions of the project that are meeting success criteria goals. This request will be in conjunction with IRT site inspections. In 2024, approximately 68 container trees, 614 bare root trees, and 4260 live stakes were planted across the site and invasive species were also treated. These maintenance activities are described in the table below. FILO has completed and plans to continue supplemental planting and invasive species control on-site. FILO staff will quantify the amount of project length needing repairs vs. successful and submit this as an AMP to the IRT in 2025. It is anticipated that some areas will be requested for release, but some will require maintenance actions.

Table 61: Roger's Gap 2024 Maintenance Activities

Date	Staff	Action	Amount	Description
10/7/2024	KS, JB, AG	Invasive treatment	7 gallons	Foliar sprayed 3% glyphosate via UTV and backpack sprayer. Species targeted: Autumn olive, Multiflora rose, and Chinese privet
10/8/2024	JB, KS, AG	Invasive treatment	4 gallons	Foliar sprayed 3% glyphosate via backpack sprayer. Species targeted: Multiflora rose, Autumn olive, and Chinese privet
10/9/2024	KS, AG	Invasive treatment	1 gallon	Foliar sprayed 3% glyphosate via backpack sprayer. Species targeted: Multiflora rose and Autumn olive
10/7/2024	AG, JB, KS	Invasive treatment	15 gallons	Foliar sprayed 3% glyphosate via backpack sprayer. Species targeted: Multiflora rose, Autumn olive, and Chinese privet
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

Browns Bottom Wetland, Owen County: In 2022, FILO proposed to enhance 4.5 acres of wetland located on the Kentucky River WMA. The project is expected to generate 2.2 wetland credits and will be protected by a deed restriction. In 2023, FILO finalized the details of the conservation easement (SPI) with USFWS and plans to execute the SPI in 2025. In 2024, wetland wells were installed to aid in data collection for the Mitigation Plan and future monitoring reports.

Table 62: Browns Bottom Wetland 2024 Maintenance Activities

Date	Staff	Action	Amount	Description
10/24/2024	BW, AS, TVA	Wetland wells	3 troll wells	Installed wetland wells for pre-construction monitoring.

Cave Creek Wetland, Fayette County: Still in the early stages of development in 2022, this site is a potential wetland restoration project that could generate approximately 10 wetland credits. It

was approved by the IRT in 2023. In 2024, agreements were made with the landowner regarding easement location and the easement acquisition is expected to be completed in early 2025.

LTM Project Status

In 2024, no remedial LTM activities are required in the Lower Kentucky River Service Area and the following table describes the LTM visits.

Table 63: 2024 LTM Actions in the Lower Kentucky River Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Lower Kentucky	Cove Spring	5/9/2023	Good	Good	Project visited and no actions needed
Lower Kentucky	Elm Fork	10/18/2023	Good	Good	Project visited and no actions needed
Lower Kentucky	Mill Creek Elementary	5/9/2023	Good	Good	Project visited and no actions needed

Table 64: Project Status in the Lower Kentucky Service Area

Count	Project	Status	County	USACE District	404 Permit #
1	Minors Cr 2	CP Approved	Owen	Louisville	LRL-2019-01049
2	Browns Bottom	CP Approved	Owen	Louisville	LRL-2022-00711
3	Cave Creek Wetland	CP Approved	Fayette	Louisville	LRL-2022-00982
4	Pond Creek	Design /Permit	Owen	Louisville	LRL-2014-191-pgj
5	Red Oak Creek ABD	Design /Permit	Owen	Louisville	LRL-2018-00770-pgj
6	Red Oak Creek C	Monitoring - YR 5	Owen	Louisville	LRL-2014-500-pgj
7	Rogers Gap	Monitoring - YR 5	Scott	Louisville	LRL-2013-134-pgj
8	Elm Fk	Released - Long Term Management	Owen	Louisville	LRL-2012-263-pgj
9	Mill Cr	Released - Long Term Management	Fayette	Louisville	LRL-2009-611-pgj
10	Cove Spring	Released - Long Term Management	Franklin	Louisville	LRL-2009-614 pgj
11	Minors Cr	Released - Long Term Management	Owen	Louisville	LRL-2013-91-pgj
1	Boling Branch	Approved - Terminated	Henry	Louisville	LRL-2017-261
2	Wolf Run	Approved - Terminated	Fayette	Louisville	200600323-pgj

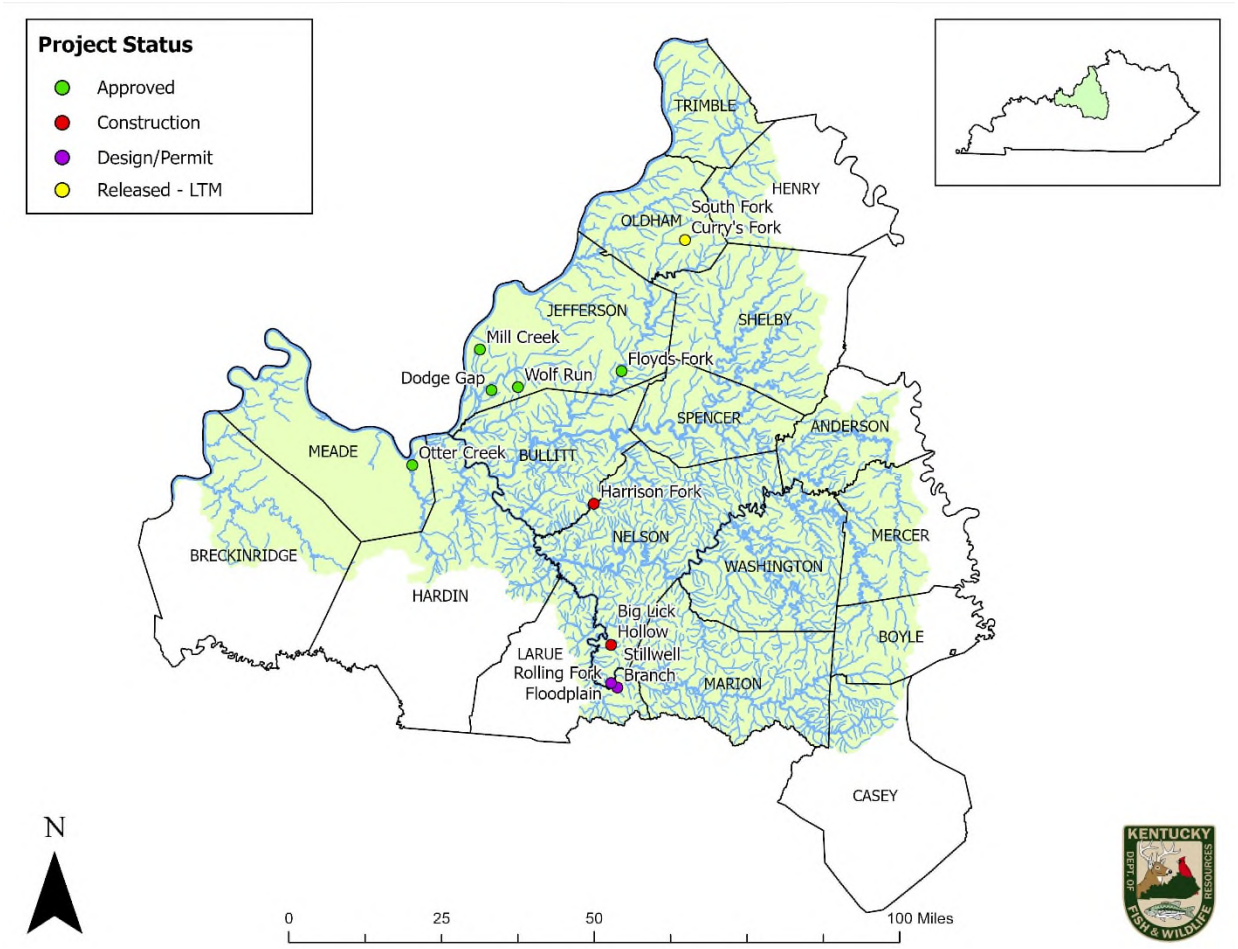
Table 64 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit, where the bulk of design and permitting processes occur. **Table 65** shows a subset of projects that are in this stage of development. For the Lower Kentucky River Service Area, there are several projects with IRT CP approval, however those projects are either slow to fully execute SPIs or have required multiple iterations of mitigation plans to determine the best ecologically beneficial approach. The next phase of the Red Oak site, known as Drainages A, B, and D, will serve to provide stream credits for the next sales as well as including wetland credits. Focusing on wetland credit development in the Lower Kentucky River Service Area reduced the priority for developing Minors Creek 2 (aka Bogardus Property) and increased the priority for producing mitigation plans and permit applications for Pond Creek, Browns Bottom and recently IRT CP approved Cave Creek wetland.

Table 65: Project Status by Permit Milestone between SPI and Construction.

Project	Cave Creek Wetland	Red Oak A, B, D	Pond Creek	Minors Creek 2
KDFWR Service Area	Lower Kentucky	Lower Kentucky	Lower Kentucky	Lower Kentucky
USACE LRL#/LRN#/MVM#	LRL-2022-00982	LRL-2018-00770.pgj	LRL-2014-191.pgj	LRL-2019-01049.pgj
Section 7 Submittal	Fall 2025	2/29/2024	Winter 2025	Winter 2025
Section 7 Concurrence	Winter 2026	5/24/2024	Spring 2025	Spring 2025
Section 106 Submittal	Fall 2025	1/4/2021	7/20/2015	Spring 2025
Section 106 Concurrence	Winter 2026	8/2/2021	10/29/2017	Summer 2025
IRT Design Review Date	Summer 2025	3/15/2021	2/6/2024	4/23/2024
JD Site Visit	Summer 2025	5/27/2021	2/7/2024	4/23/2024
Design Review and PJD comments received	Summer 2025	5/18/2023	Winter 2025	Fall 2024
Draft MP Submittal	Fall 2025	11/17/2023	Winter 2025	Spring 2025
Submit Pre-Filing Request	Fall 2025	12/5/2023	Winter 2025	Spring 2025
401 Application Date	Winter 2026	2/29/2024	Spring 2025	Fall 2025
401 FP Permit Received	Spring 2026	3/2/2024	Summer 2025	Winter 2026
401 WQC Permit Received	Spring 2026	6/6/2024	Summer 2025	Winter 2026
404 Application Date	Winter 2026	2/29/2024	Spring 2025	Fall 2025
404 Permit Received	Summer 2026	10/2/2024	Fall 2025	Spring 2026
Begin Construction	Fall 2026	Winter 2025	Fall 2025	Summer 2026

Salt River Service Area

Figure 26: Project Status in the Salt River Service Area 2024



*There are nine active projects in this service area and one in the LTM phase. These projects are within the USACE Louisville District and KAP region, which utilizes the AMU credit system (**Figure 26**). The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 100 AMU advanced wetland credits. A minor instrument modification in CY22 increased the number of advanced wetland credits in the Salt River Service Area to 200. **Table 67** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24 (*

Table 68).

Table 66 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 66 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 27 shows the cumulative credit values of project by major

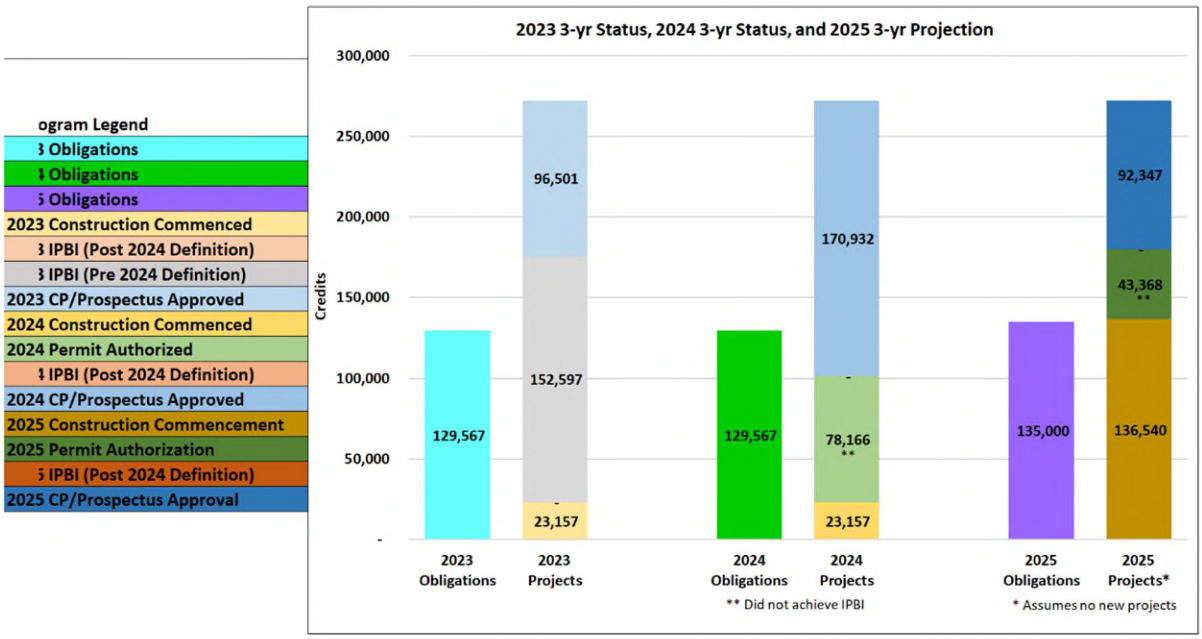
milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 27 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

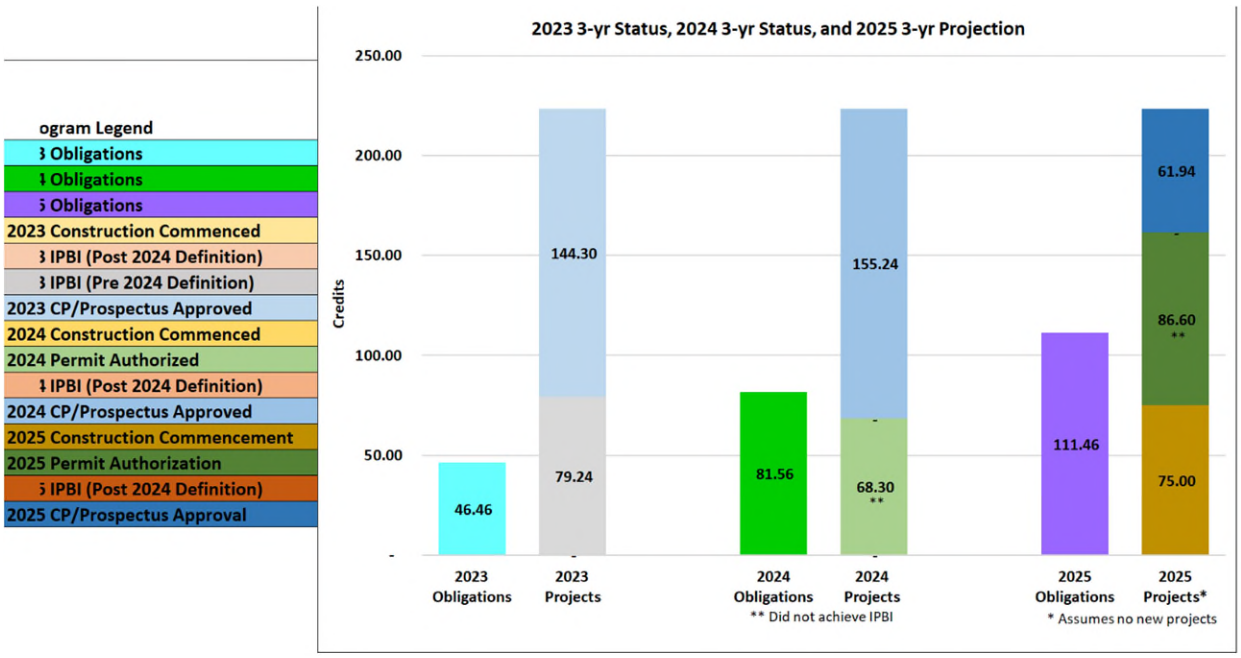
Table 66: Salt River Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00
2012	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15
2013	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00
2014	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09
2015	7,968.80	7,968.80	7,400.76	7,968.80	7,400.76	7,968.80
2016	3,968.00	3,968.00	-	3,968.00	-	3,968.00
2017	-	-	-	-	-	-
2017	83,154.00	83,154.00	-	73,629.96	-	83,154.00
2018	72.00	72.00	-	-	-	72.00
2018	11,225.00	11,225.00	-	-	-	11,225.00
2019	231.00	231.00	-	-	-	231.00
2020	90.00	90.00	-	-	-	90.00
2020	7,102.00	7,102.00	-	-	-	7,102.00
2021	-	-	-	-	-	-
2022	2,737.00	2,737.00	-	-	-	2,737.00
2022	2,696.00	2,696.00	-	-	-	2,696.00
2023	3,385.00	3,385.00	-	-	-	3,385.00
2024	9,859.00	9,859.00	-	-	-	9,859.00
Future		124,010.46	-	-	-	124,010.46
Total	148,244.04	272,254.50	23,157.00	101,323.00	23,157.00	272,254.50

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	2.540	2.540	-	2.54	-	2.54
2012	-	-	-	-	-	-
2013	1.900	1.900	-	1.90	-	1.90
2014	-	-	-	-	-	-
2015	0.723	0.723	-	0.72	-	0.72
2016	16.300	16.300	-	16.30	-	16.30
2017	2.800	2.800	-	2.80	-	2.80
2017	14.400	14.400	-	14.40	-	14.40
2018	1.400	1.400	-	1.40	-	1.40
2018	2.100	2.100	-	2.10	-	2.10
2019	3.900	3.900	-	3.90	-	3.90
2020	-	-	-	-	-	-
2020	0.400	0.400	-	0.40	-	0.40
2021	35.100	35.100	-	21.84	-	35.10
2022	28.600	28.600	-	-	-	28.60
2022	1.300	1.300	-	-	-	1.30
2023	11.900	11.900	-	-	-	11.90
2024	4.600	4.600	-	-	-	4.60
Future		95.573	-	-	-	95.57
Total	127.963	223.536	-	68.30	-	223.54

Figure 27: Salt River comparison of credit sales to project credit values, organized by year and by major milestones. Stream credits, then wetland.





Credit Costs, Balances and CY24 Activity

Table 67: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream AMU Regions	Salt
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	106,624.96
CY2024 Credits Sold	9,859.00
CY2024 Released Credits*	14,699.00
CY2024 Ending Advance Stream AMU Balance	111,464.96

WETLAND AMUs	Salt
Advance Credit Allocation	200.000
CY2024 Beginning Credit Balance	76.637
CY2024 Credits Sold	4.600
Credits Withdrawn	-
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	72.037

Table 68: Credit Costs in the Salt River Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Salt (AMU)	518	518	78,000	78,000

In CY24, FILO sold 518 stream AMUs and 4.6 wetland AMUs in the Salt River Service Area contributing 5.4M to service area funds and representing over 20% of total funds received from

receipts over all service areas. In-lieu-fee payments to FILO from mitigation impacts caused by 404-permitted activities including impact types and the amounts are included in **Table 69**. Full or partial disclosure of records concerning funds can be requested through the Freedom of Information Act (FOIA).

Table 69: Receipts for Purchased Credits including Impact Types

Receipts - type of payment	Amount	Service Area	County	Stream / Wetland	Credits	Perennial Credits	Intermittent Credits	Ephemeral Credits	Wetland Credits
development	$ 1,599,066.00	SR	Bullitt	S	3,087.0		3,087.0		
development	$ 442,372.00	SR	Jefferson	S	854.0		175.0	538.0	
development	$ 263,144.00	SR	Oldham	S	508.0		508.0		
development	$ 187,200.00	SR	Bullitt	W	2.4				2.4
development	$ 31,200.00	SR	Jefferson	W	0.4				0.4
municipal	$ 46,800.00	SR	Jefferson	W	0.6				0.6
municipal	$ 93,600.00	SR	Jefferson	W	1.2				1.2
transportation	$ 1,167,054.00	SR	Marion	S	2,253.0	1,747.0	506.0		
transportation	$ 1,635,326.00	SR	Nelson	S	3,157.0	1,505.0	1,652.0		

Below is a list of active projects in the service area that have been designated LRL numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 72**).

Active Project Status

Big Lick Hollow, Nelson County: IRT approved in 2018, this project was presented as part of a Full Delivery contract with Stantec Consulting Services Inc. It is expected to generate over 23,000 AMU stream credits and is permanently protected with a third-party conservation easement. In late 2023, FILO (and Stantec Consulting Services, Inc.) received the 404 Department of Army Permit and construction commenced. In 2024, construction continued and anticipates an As-Built credit release in early 2025.

Dodge Gap, Jefferson County: IRT approved in 2018, this project is in the Jefferson Memorial Forest. It is expected it generate roughly 4,900 stream AMUs and will be permanently protected with a conservation easement. In 2021, a feasibility study was done to reassess jurisdictional reaches and add headwater streams to the project. In 2022, FILO continued to develop the easement with the landowner. In 2023, FILO submitted the Phase 1 Archaeological Report and the Cultural Resources Report for Section 106 of the National Historic Preservation Act. In 2024, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and received Section 7 and 106 concurrences. Also in 2024, FILO conducted the Preliminary Design/JD and Assessment Verification Meetings. FILO combined this project with Wolf Run, also in Jefferson Memorial Forest, into a single draft Mitigation Plan, which was submitted to the IRT in 2024 along with the KDOW Pre-Filing Meeting request. Additionally, FILO continued to develop the design and easement with the landowner in 2024.

Harrison Fork, Nelson County: In 2017, FILO (and University of Louisville) received a Floodplain Permit. In 2019, FILO (and University of Louisville) received the 401 Water Quality Certification. In 2021, FILO closed on the easement. In 2022, FILO (and University of Louisville) submitted the application for the 404 Department of Army Permit. In 2023, FILO (and University of Louisville) received the 404 Department of Army Permit and finalized contracting construction. In 2024, FILO (and University of Louisville) commenced construction.

Otter Creek, Meade County: The project has the largest watershed of any FILO project with just over 100 square miles. Because of its size, good water quality, and significant physical degradation, the potential exists to create outstanding habitat that will support an excellent fishery and canoe recreation. In 2019, FILO completed the Environmental Assessment, a draft Mitigation Plan, and received concurrence for Section 7. In 2020, FILO continued design and Mitigation Plan development. From 2021-2024, FILO continued to work on deed restrictions.

Stillwell Branch, Larue County: IRT approved the CP in 2018, this project is on KDFWR's Rolling Fork WMA. It is expected to generate over 60,000 AMU stream credits and will be permanently protected with deed restrictions. In 2020, FILO conducted the Preliminary Design/JD and Assessment Verification meetings and continued design and Mitigation Plan development. In 2021, FILO submitted a draft Mitigation Plan and received concurrence for Section 106 of the National Historic Preservation Act. In 2022, FILO submitted a Biological Assessment for Section 7 of the Endangered Species Act, and continued design and Mitigation Plan development. In 2023, FILO continued design and Mitigation Plan development, and continued discussions with USACE and USFWS regarding the Biological Assessment. In 2024, FILO resubmitted the Biological Assessment and received Section 7 concurrence. Also in 2024, FILO finalized the Mitigation Plan and applied for and received the KDOW Floodplain Permit, 401 Water Quality Certification, and 404 Department of Army Permit. FILO also advertised the project for construction bidding and expects construction to begin in 2025.

Rolling Fork Floodplain, Larue and Nelson Counties: The CP was approved by the IRT in 2020, this project is on KDFWR's Rolling Fork WMA. It is expected to generate 4,800 AMU stream credits, 66 wetland AMU credits and will be permanently protected with deed restrictions. In 2021, FILO started designing the project, collected field data for a Biological Assessment for Section 7 of the Endangered Species Act, and submitted a Phase I Archaeological Report for Section 106 of the National Historic Preservation Act. In 2022, FILO conducted the Preliminary Design/JD and Assessment Verification meetings, submitted a Biological Assessment for Section 7 of the Endangered Species Act, and continued design and Mitigation Plan development. In 2023, FILO received Section 7 and Section 106 concurrences. In 2024, FILO finalized the Mitigation Plan and applied for and received the KDOW Floodplain Permit, 401 Water Quality Certification, and 404 Department of Army Permit. FILO plans to advertise the project for construction bidding and begin construction in 2025.

Rolling Fork River, Larue and Nelson Counties: Approved by the IRT in 2020, this project is on the KDFWR's Rolling Fork WMA and is adjacent to the Rolling Fork Floodplain project. In 2021, FILO started designing the project, collected field data for a Biological Assessment for Section 7 of the Endangered Species Act, and submitted a Phase I Archaeological Report for Section 106 of the National Historic Preservation Act. In 2022, FILO conducted the Preliminary

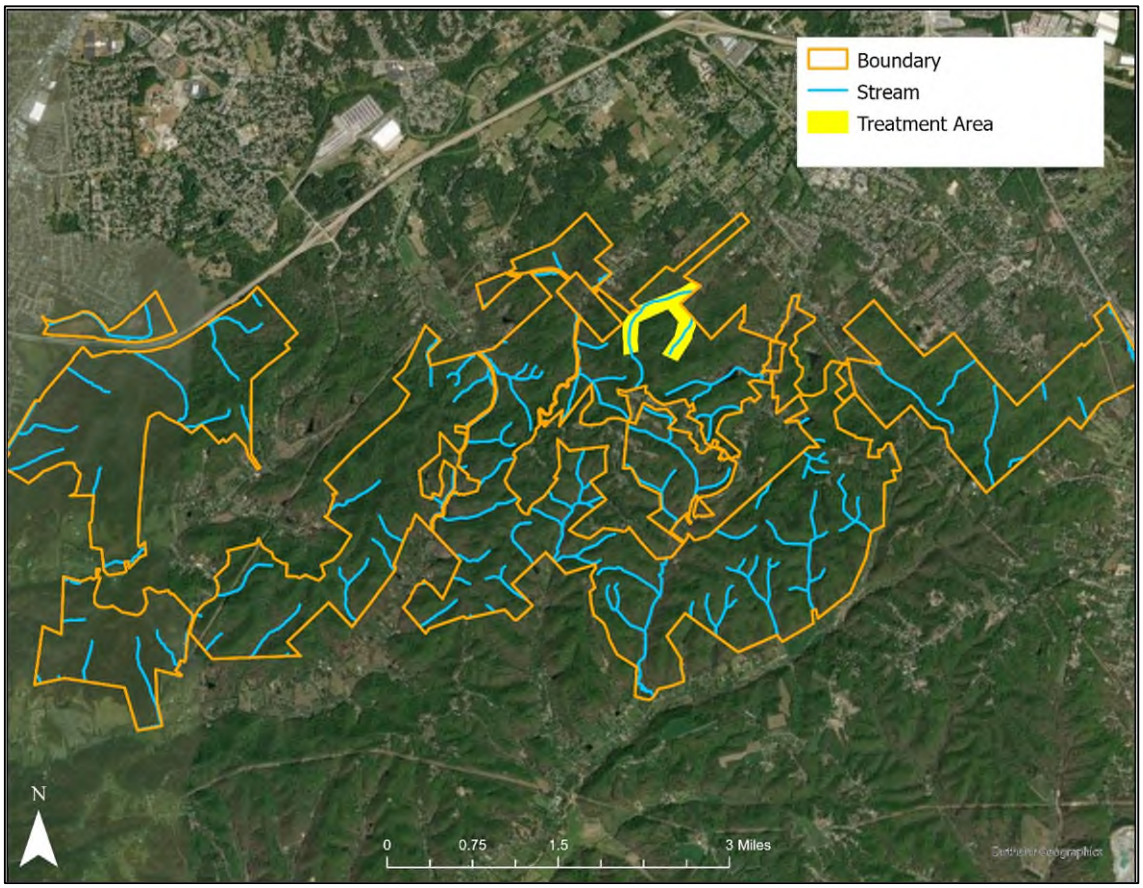
Design/JD and Assessment Verification meetings, conducted mussel sampling, and consulted with KDFWR mussel experts and USFWS to determine a stream restoration approach that would provide habitat improvement with minimal impact to existing mussel populations, and continued design and Mitigation Plan development. In 2023, FILO submitted the Biological Assessment and received Section 106 concurrence. No additional progress occurred in 2024.

Wolf Run, Jefferson County: The project is almost entirely on the Jefferson Memorial Forest. It will be developed in coordination with the Louisville-Jefferson County Metro Parks. Design began in late 2015. In 2022, FILO continued to develop the easement and design. In 2023, FILO conducted the Preliminary Design/JD and Assessment Verification meetings and submitted a Phase I Archaeological Report for Section 106 of the National Historic Preservation Act. Also in 2023, FILO staff treated invasive species. This effort continued in 2024 and is described in the table and figure below. Also in 2024, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and received Section 7 concurrence. FILO then combined this project with Dodge Gap, also in Jefferson Memorial Forest, into a single draft Mitigation Plan, which was submitted to the IRT with the KDOW Pre-Filing Meeting request. The project was extended downstream to include more stream and wetland mitigation in 2024, which was included in the 2024 Section 7 concurrence, but additional Section 106 concurrence was required and completed in 2024. FILO continued to develop the easement with the landowner and the design in 2024.

Table 70: Wolf Run 2024 IPBI Activities

Date	Staff	Action	Amount	Description
9/10/2024	BW, KS, JB	Invasive treatment	6 gallons	Foliar sprayed with 3% glyphosate with backpack sprayers Species targeted: Japanese barberry, Chinese privet, Multiflora rose, Common reed grass, and Johnson grass
9/11/2024	AG, KS, JB	Invasive treatment	3 gallons	Foliar sprayed with 3% glyphosate with backpack sprayers Species targeted: Japanese barberry, Chinese privet, and Multiflora rose
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

Figure 28: Wolf Run 2024 IPBI Treatment Area



Mill Creek, Jefferson County: Approved by the IRT in 2020, this project is a large-scale urban project with over 180 public and private parcels that are projected to protect over 2,000 acres from development and stream encroachment. The project could generate up to approximately 88,000 AMU stream credits and 93 AMU wetland credits but is divided into five independently viable sections. In 2021 and 2022, title and appraisal work progressed. In 2022, FILO staff worked with Louisville Parks and Metropolitan Sewer District (MSD) on a public outreach effort for coordination and developing the Mill Creek corridor as a part of a larger trail and park system. In 2023, FILO started collecting design and survey data to define the project extents with Louisville-Jefferson County. In 2024, FILO started developing the Mitigation Plan and continued to develop the design and easement with the landowner.

LTM Project Status

There were no LTM activities required in 2024 in the Salt River Service Area and **Table 71** below describes the LTM site visits.

Table 71: 2024 LTM Actions in the Salt River Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Salt	South Fork Curry's Fork	1/18/2023	Good	Good	Project visited and no actions needed

Table 72: Project Status in the Salt River Service Area

Count	Project	Status	County	USACE District	404 Permit #
1	Mill Creek	CP Approved	Jefferson	Louisville	LRL-2020-00188
2	Dodge Gap	CP Approved	Jefferson	Louisville	LRL-2018-00112
3	Rolling Fork Floodplain	Design/Permit	Larue/ Nelson	Louisville	LRL-2020-00630-pgj
4	Rolling Fork River	Design/Permit	Larue/ Nelson	Louisville	LRL-2020-00631-pgj
5	Big Lick Hollow	Design/Permit	Nelson	Louisville	LRL-2018-00383-pgj
6	Stillwell Branch	Design/Permit	Larue	Louisville	LRL-2017-00906-pgj
7	Harrison Fk	Design/Permit	Nelson	Louisville	LRL-2012-274-pgj
8	Otter Cr	Design/Permit	Meade	Louisville	LRL-2013-425-pg
9	Wolf Run	Design/Permit	Jefferson	Louisville	LRL-2014-60-pgj
10	S Fk Currys Cr	Released - Long Term Management	Oldham	Louisville	LRL-2009-98-pgj
1	Floyd's Fork Wetland	Approved - Terminated	Jefferson	Louisville	LRL-2019-00933-pgj
2	Floyd's Fork Streams	Approved - Terminated	Jefferson	Louisville	LRL-2015-216-pgj

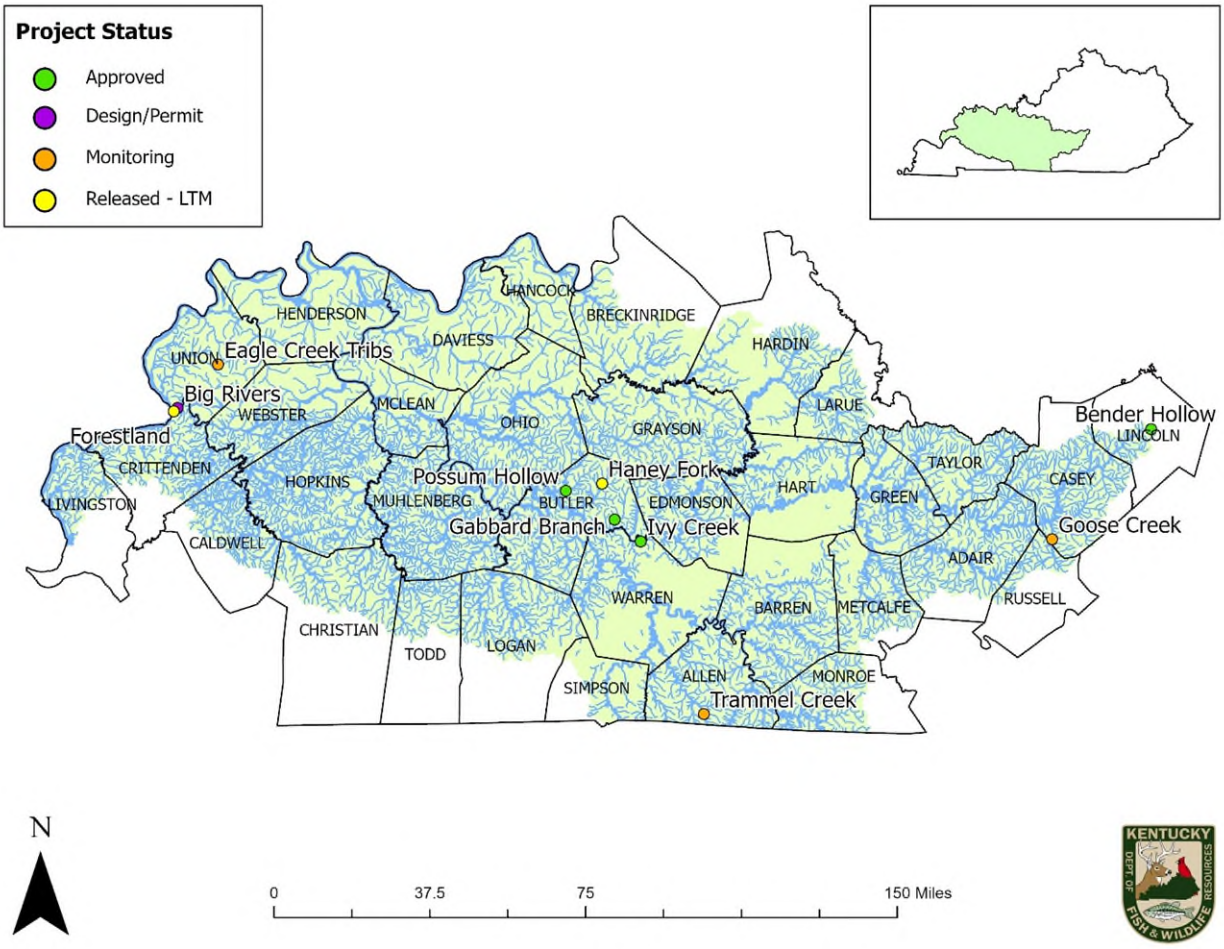
Table 72 shows a list of all past and current projects by status at a coarse level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit (i.e., starting construction), where the bulk of design and permitting processes occur. **Table 73** shows a subset of projects that are in these stages of development. For the Salt River Service Area there are lots of credit sales for both streams and wetlands. To provide that mitigation there are two projects with IRT approved CPs and pending SPIs, and several projects in design and permitting stages, including at least two of those that will have complete permit application packages submitted (Stillwell, Rolling Fork FP), and another one starting construction (Big Lick Hollow) in early 2024. Big Lick Hollow is the first of three "Full Delivery" contracting style projects to be authorized for construction and credit release.

Table 73: Project Status by Permit Milestone between SPI and Construction.

Project	Big Lick Hollow FD	Harrison Fork MOA	Stillwell Branch	Rolling Fork FP	Wolf Run	Dodge Gap	Rolling Fork River	Otter Creek	Mill Creek
KDFWR Service Area	Salt	Salt	Salt	Salt	Salt	Salt	Salt	Salt	Salt
USACE LRL#/LRN#/MVM#	LRL-2018-00383	LRL-2012-274	LRL-2017-00906	LRL-2020-00630	LRL-2014-60	LRL-2018-00112	LRL-2020-00631	LRL-2013-425	LRL-2020-00188
Section 7 Submittal	1/22/2021	3/1/2017	2/27/2024	5/24/2022	9/5/2024	6/17/2024	3/1/2023	7/3/2019	Spring 2025
Section 7 Concurrence	9/27/2022	3/17/2017	4/26/2024	7/12/2023	12/3/2024	12/3/2024	Spring 2025	9/20/2019	Summer 2025
Section 106 Submittal	NA	1/11/2010	12/8/2020	5/18/2021	9/7/2023 1/24/2024	5/15/2023	5/18/2021	NA	Spring 2025
Section 106 Concurrence	NA	3/12/2010 2/1/2022	10/10/2021	1/25/2023	2/10/2025 6/27/2024	8/21/2024	1/25/2023	NA	Summer 2025
IRT Design Review Date	2/6/2020	NA	2/4/2020	1/11/2022	6/16/2023	2/6/2024	1/11/2022	NA	Spring 2025
JD Site Visit	2/6/2020	NA	12/1/2020	2/28/2022	6/20/2023	2/13/2024	2/28/2022	NA	Spring 2025
Design Review and PJD comments received	4/27/2020	NA	3/31/2020	5/16/2023	6/27/2023	Fall 2024	5/16/2023	NA	Spring 2025
Draft MP Submittal	7/2/2020	5/27/2017	7/15/2021	11/27/2023	9/17/2024	9/17/2024	tbd	tbd	Spring 2025
Submit Pre-Filing Request	8/15/2022	NA	7/15/2021	12/5/2023	9/18/2024	9/18/2024	tbd	tbd	Spring 2025
401 Application Date	8/25/2020 9/15/2022	11/10/2016	2/15/2024	5/14/2024	Fall 2024	Fall 2024	tbd	tbd	Summer 2025
401 FP Permit Received	8/27/2021	11/29/2017	2/18/2024	5/16/2024	Spring 2025	Spring 2025	tbd	tbd	Fall 2025
401 WQC Permit Received	10/27/2022	6/27/2019	6/4/2024	6/25/2024	Spring 2025	Spring 2025	tbd	tbd	Fall 2025
404 Application Date	10/28/2022	2/3/2022	2/15/2024	5/14/2024	Fall 2024	Fall 2024	tbd	tbd	Summer 2025
404 Permit Received	8/8/2023	10/17/2023	9/19/2024	10/22/2024	Spring 2025	Spring 2025	tbd	tbd	Winter 2026
Begin Construction	12/11/2023	8/26/2024	Winter 2025	Winter 2025	Fall 2025	Fall 2025	tbd	tbd	Fall 2026

Green River Service Area

Figure 29: Project Status in the Green River Service Area 2024



There are eight active projects in this service area and two in the LTM phase. These projects are within the USACE Louisville District and the KAP region, which utilizes the AMU credit system (**Figure 29**). The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 200 AMU advanced wetland credits. **Table 75** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24 (**Table 76**).

Table 74 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 74 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 30 shows the cumulative credit values of project by major

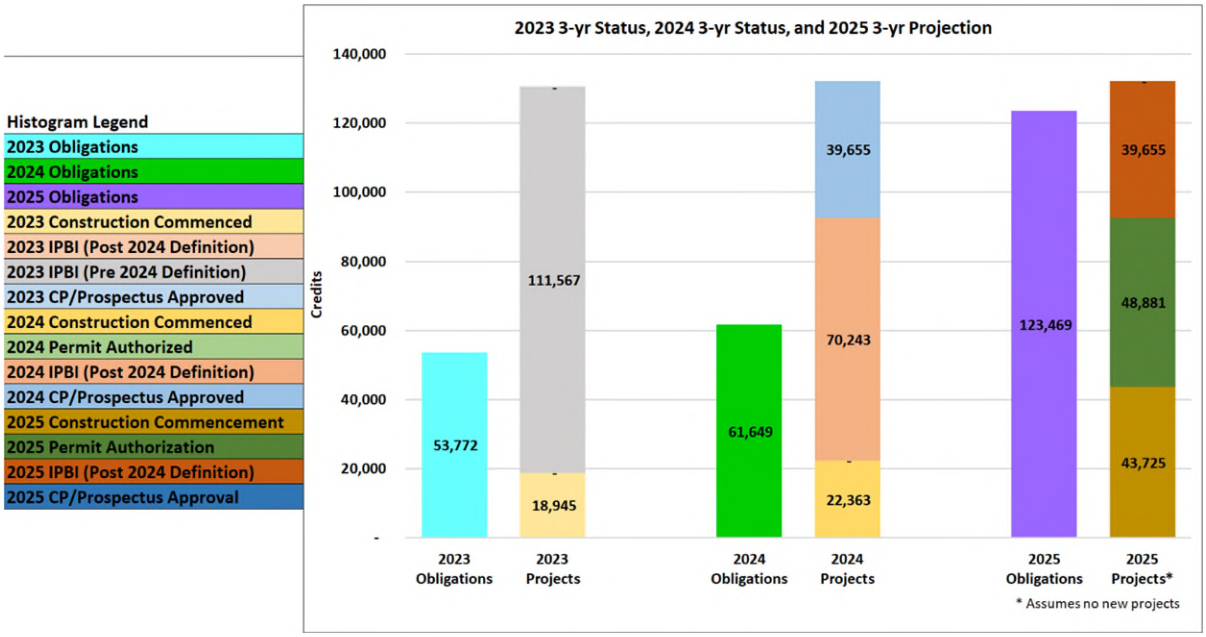
milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 30 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

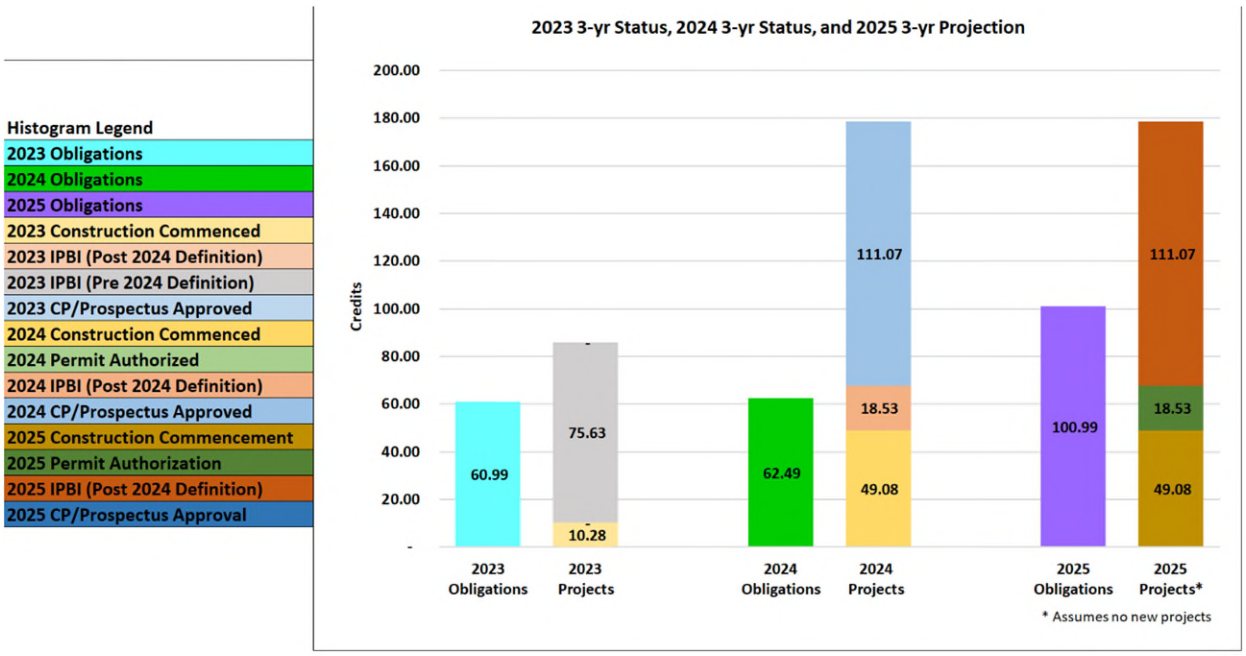
Table 74: Green River Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00
2012	7,582.00	7,582.00	7,582.00	7,582.00	7,582.00	7,582.00
2012	3,142.60	3,142.60	530.00	530.00	3,142.60	3,142.60
2013	1,621.85	1,621.85	-	-	1,621.85	1,621.85
2014	14,688.21	14,688.21	-	-	14,688.21	14,688.21
2015	1,405.40	1,405.40	-	-	1,405.40	1,405.40
2016	2,343.00	2,343.00	-	-	2,343.00	2,343.00
2017	582.00	582.00	-	-	582.00	582.00
2017	2,434.00	2,434.00	-	-	2,434.00	2,434.00
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	2,867.00	2,867.00	-	-	2,867.00	2,867.00
2020	-	-	-	-	-	-
2020	2,855.00	2,855.00	-	-	2,855.00	2,855.00
2021	7,877.00	7,877.00	-	-	7,877.00	7,877.00
2022	61,820.00	61,820.00	-	-	30,956.94	61,820.00
2022	-	-	-	-	-	-
2023	3,183.00	3,183.00	-	-	-	3,183.00
2024	8,398.00	5,608.84	-	-	-	5,608.84
Future		-	-	-	-	-
Total	135,050.06	132,260.90	22,363.00	22,363.00	92,606.00	132,260.90

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	10.280	10.280	10.28	10.28	10.28	10.28
2012	7.444	7.444	7.44	7.44	7.44	7.44
2013	3.814	3.814	3.81	3.81	3.81	3.81
2014	5.700	5.700	5.70	5.70	5.70	5.70
2015	11.190	11.190	11.19	11.19	11.19	11.19
2016	4.500	4.500	4.50	4.50	4.50	4.50
2017	3.000	3.000	3.00	3.00	3.00	3.00
2017	0.360	0.360	0.36	0.36	0.36	0.36
2018	7.400	7.400	2.79	2.79	7.40	7.40
2018	-	-	-	-	-	-
2019	7.300	7.300	-	-	7.30	7.30
2020	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	1.500	1.500	-	-	1.50	1.50
2022	38.500	38.500	-	-	5.12	38.50
2022	-	-	-	-	-	-
2023	2.600	2.600	-	-	-	2.60
2024	2.800	2.800	-	-	-	2.80
Future		72.292	-	-	-	72.29
Total	106.388	178.680	49.08	49.08	67.61	178.68

Figure 30: Green River comparison of credit sales to project credit values, organized by year and by major milestones. Stream credit, then wetland credit.





Credit Costs, Balances and CY24 Activity

Table 75: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream AMU Regions	Green
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	113,347.94
CY2024 Credits Sold	8,398.00
CY2024 Released Credits	2,998.00
CY2024 Ending Advance Stream AMU Balance	107,947.94

WETLAND AMUs	Green
Advance Credit Allocation	200.000
CY2024 Beginning Credit Balance	96.412
CY2024 Credits Sold	2.800
Credits Withdrawn	-
CY2024 Released Credits	9.970
CY2024 Ending Advance Wetland AMU Balance	103.582

Table 76: Credit Costs in the Green River Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Green (AMU)	549	549	78,000	78,000

In CY24, FILO sold 549 stream AMUs and 2.8 wetland AMUs in the Green River Service Area contributing 4.8M to service area funds and representing over 20% of total funds received from receipts over all service areas. In-lieu-fee payments to FILO from mitigation impacts caused by 404-permitted activities including impact types and the amounts are included in **Table 77**. Full or partial disclosure of records concerning funds can be requested through the Freedom of Information Act (FOIA).

Table 77: Receipts for Purchased Credits including Impact Types

Receipts - type of payment	Amount	Service Area	County	Stream / Wetland	Credits	Perennial Credits	Intermittent Credits	Ephemeral Credits	Wetland Credits
development	$ 106,506.00	GR	Hancock	S	194.0		194.0		
development	$ 54,600.00	GR	Adair	W	0.7				0.7
development	$ 163,800.00	GR*	Knox	W	2.1				2.1
mining	$ 3,422,466.00	GR	Union	S	6,234.0		6,234.0		
trans	$ 1,081,530.00	GR	Union	S	1,970.0		1,970.0		
*Knox County Credits sold out of Green River per Nashville Corps									

FILO staff continued their efforts in locating potential project sites in the Green River Service Area through various landowner contacts and consultants. The IRT reviewed Possum Hollow Wetland Addendum tract CP and reviewed a virtual on-site visit and staff assessed a new potential site adjoining the existing Goose Creek project. Below is a list of active projects in the service area that have been designated LRL numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 83**).

Active Project Status

Ivy Creek, Warren County: Approved by the IRT in 2019, this project is on private property with over three miles of Green River bank and riparian zone. It is estimated to produce over 37,000 AMU stream credits and 18 AMU wetland credits and will be permanently protected with a conservation easement. In 2022, FILO continued developing the easement and started collecting design data. In 2023, FILO began working on the Mitigation Plan and design, conducted the Preliminary Design/JD and Assessment Verification meetings, and collected field data for the Biological Assessment for Section 7 of the Endangered Species Act and the Phase I Archaeological Report and Cultural Resources Report for Section 106 of the National Historic Preservation Act. In 2024, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and a Phase 1 Archaeology Report and Cultural Resources Report for Section 106 of the National Historic Preservation Act and received Section 7 concurrence. Also in 2024, FILO completed the 866-acre easement acquisition and continued developing the Mitigation Plan and design. In 2025, oil wells will be capped.

Big Rivers WMA Wetland, Union County: The project was approved in 2017. It is located on the Big Rivers WMA, and it will provide over 40 wetland credits. In 2019, FILO continued working

on the design and conducted a Preliminary Design meeting. In 2022, FILO continued developing the Mitigation Plan and design, submitted the Biological Assessment for Section 7 of the Endangered Species Act, and received Section 106 concurrence. In 2023, FILO finalized the Mitigation Plan, received Section 7 concurrence, received a Floodplain Permit, and submitted for the 401 Water Quality Certification and the 404 Department of Army Permit. In 2024, FILO received the 401 Water Quality Certification and the 404 Department of Army Permit and advertised the project for construction bidding and expects construction to begin in 2025.

Eagle Creek Tributary, Union County: The project is entirely within the Higginson-Henry WMA. A settlement agreement was reached with the contractor in 2021. Year Five of monitoring was completed in 2021. Assessment, monitoring, and Adapted Management Plan (AMP) development was conducted in 2022 and continued in 2023, along with additional monitoring. A Year 7 extended monitoring report was submitted in December 2023. In 2023, FILO staff removed invasive species on the project and surrounding WMA area as part of maintenance efforts. Monitoring continued with the Year 8 report submittal in 2024. KDFWR and the design team plan to assess the site and develop an AMP to be submitted to the IRT in 2025.

Goose Creek, Casey County: The project was approved in 2013. In 2020, FILO completed construction. Immediately following construction, flooding caused damage resulting in the need for an Adaptive Management Plan (AMP). Data collection for the AMP is currently underway with a draft submittal developed in 2022. Approval and implementation of the AMP are passed pending additional assessment for new mitigation on the property. The KDFWR is negotiating to purchase the property from the heirs of the original landowner, yet this is proving to be a lengthy process due to estate probate. Final site protection as to whether owned by KDFWR with deed restrictions or remaining under private ownership with a conservation easement will greatly change the outcome of AMP actions. The KDFWR will submit an AMP once property ownership is finalized. Monitoring continues on-site with the Year 4 report submitted in December 2024.

Trammel Creek, Allen County: FILO submitted the Year Five Monitoring Report in 2014. However, the need for additional repairs and planting extended monitoring. In 2017, FILO planted additional native trees of various sizes and submitted the Year 8 monitoring report. To further help with fence damage from flooding and livestock entering the easement, the landowner was approached regarding an easement expansion. This expansion was complete in 2018 which relocated the livestock fence farther from the stream. There are some areas identified for repairs during site visits. FILO developed a repair plan in 2019. The contract for this effort was awarded in November 2020 with repair work commencing in summer 2022. Remedial planting and monitoring commenced following the effort. FILO staff live staked the repair areas in 2023 and marked the boundary with new signs in 2024 (detailed below). FILO requests to discuss project release with the IRT. The site was visited in 2024 and is successful. FILO can submit additional 2024 photos per the IRT's request and will confirm if the site is released or not.

Table 78: Trammel Creek 2024 Maintenance Activities

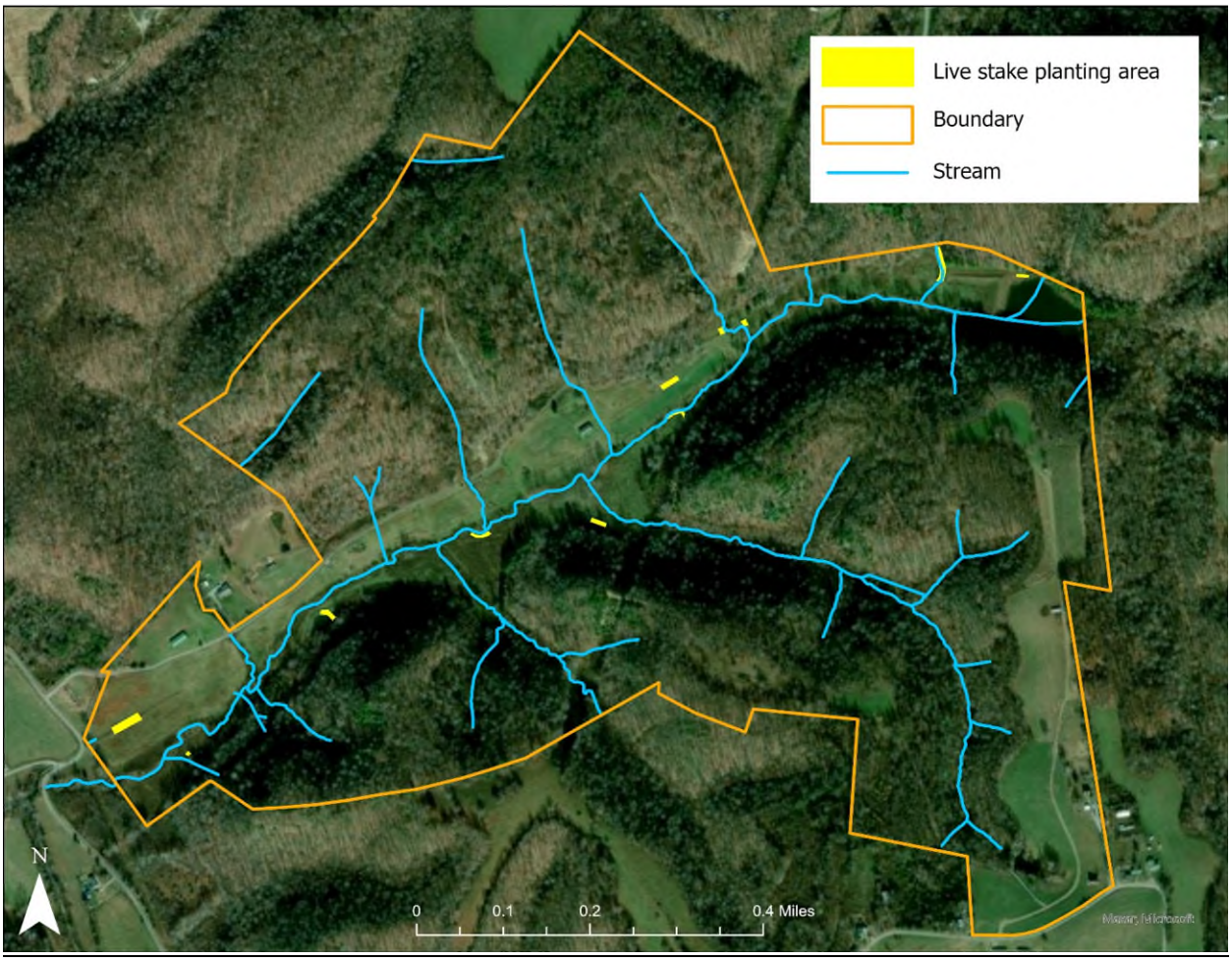
Date	Staff	Action	Amount	Description
11/7/2024	AG, JB, KS	Easement marking	15 signs	Marked easement with boundary signs.
11/12/2024	AG, JB, KS	Easement marking	14 signs	Marked easement with boundary signs.

Bender Hollow, Lincoln County: In 2020, FILO began working on the Mitigation Plan and design and conducted the Preliminary Design/JD and Assessment Verification meetings. In 2021, FILO finalized the easement, submitted a Biological Assessment for Section 7 of the Endangered Species Act, and submitted a Phase I Archaeological Report and Cultural Resources Report for Section 106 of the National Historic Preservation Act. In 2022, resubmitted a Biological Assessment for Section 7 of the Endangered Species Act, and continued working on the Mitigation Plan and design. In 2023, FILO continued working on the Mitigation Plan and design. In 2024, FILO staff maintained a mowed area for the landowner and planted live stakes in the wetland area as part of IPBI compliance.

Table 79: Bender Hollow 2024 IPBI/Maintenance Activities

Date	Staff	Action	Amount	Description
6/4/2024	WK, BW, AG	Mowing	N/A	Mowing and weed eating near pond to maintain area for landowner.
8/14/2024	BW, AG, KS	Mowing	N/A	Mowing and weed eating near pond to maintain area for landowner.
9/3/2024	AG, KS, JB	Mowing	N/A	Mowing and weed eating near pond to maintain area for landowner.
12/17/2024	JB, KS	Live stake planting	329 live stakes	Planted live stakes in specified wetland areas.

Figure 31: Bender Hollow 2024 IPBI Treatment Area

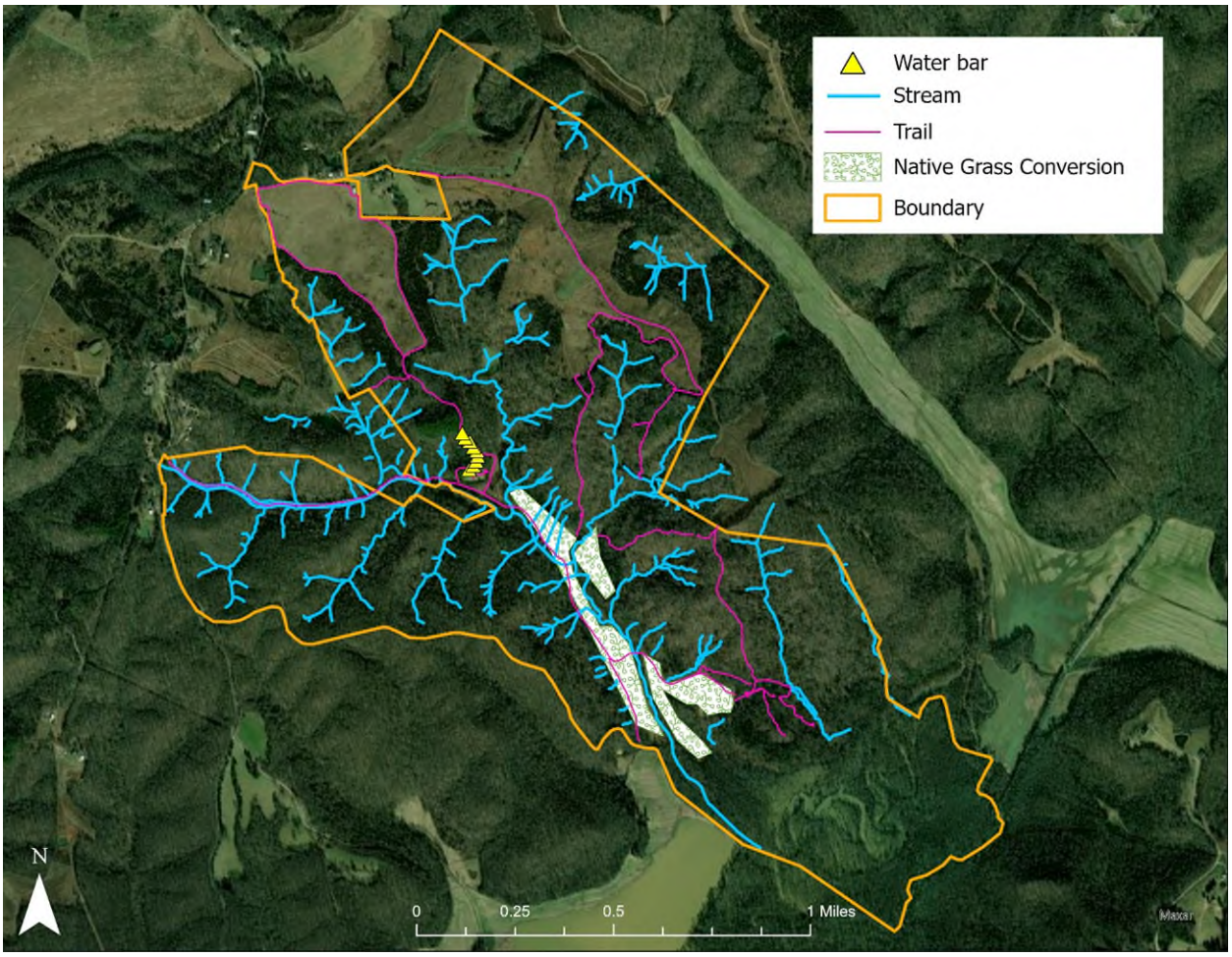


Gabbard Branch, Butler County: Approved by the IRT in 2020, this project is expected to produce over 47,000 AMU stream credits and 15 AMU wetland credits. In 2022, KDFWR completed acquisition of the properties, totaling 808 acres. In 2023, FILO began working on the Mitigation Plan and design, conducted the Preliminary Design/JD and Assessment Verification meetings, and collected field data for the Biological Assessment for Section 7 of the Endangered Species Act. In 2024, FILO continued developing the Mitigation Plan and design, submitted the Biological Assessment and a Phase 1 Archaeology Report and Cultural Resources Report for Section 106 of the National Historic Preservation Act and received Section 7 concurrence. Native grass conversion for IPBI compliance started in 2024 and will be completed by fall of 2025. Trails and water bars were also marked, and water bar construction will occur in 2025. The table and figure below detail the native grass plot details.

Table 80: Gabbard Branch 2024 IPBI Activities

Date	Staff	Action	Amount	Description
7/16/2024	BW	Native grass conversion	16.0625 gallons	Prepped area for native grass conversion by spraying 3% glyphosate with a tractor sprayer.
7/16/2024	KS, AG	Trail and water bar mapping	N/A	Marked trails and made notes for future water bar construction.
Gallons** represents the amount of diluted chemicals used to prep area for native grass planting.				

Figure 32: Gabbard Branch 2024 IPBI Treatment Area



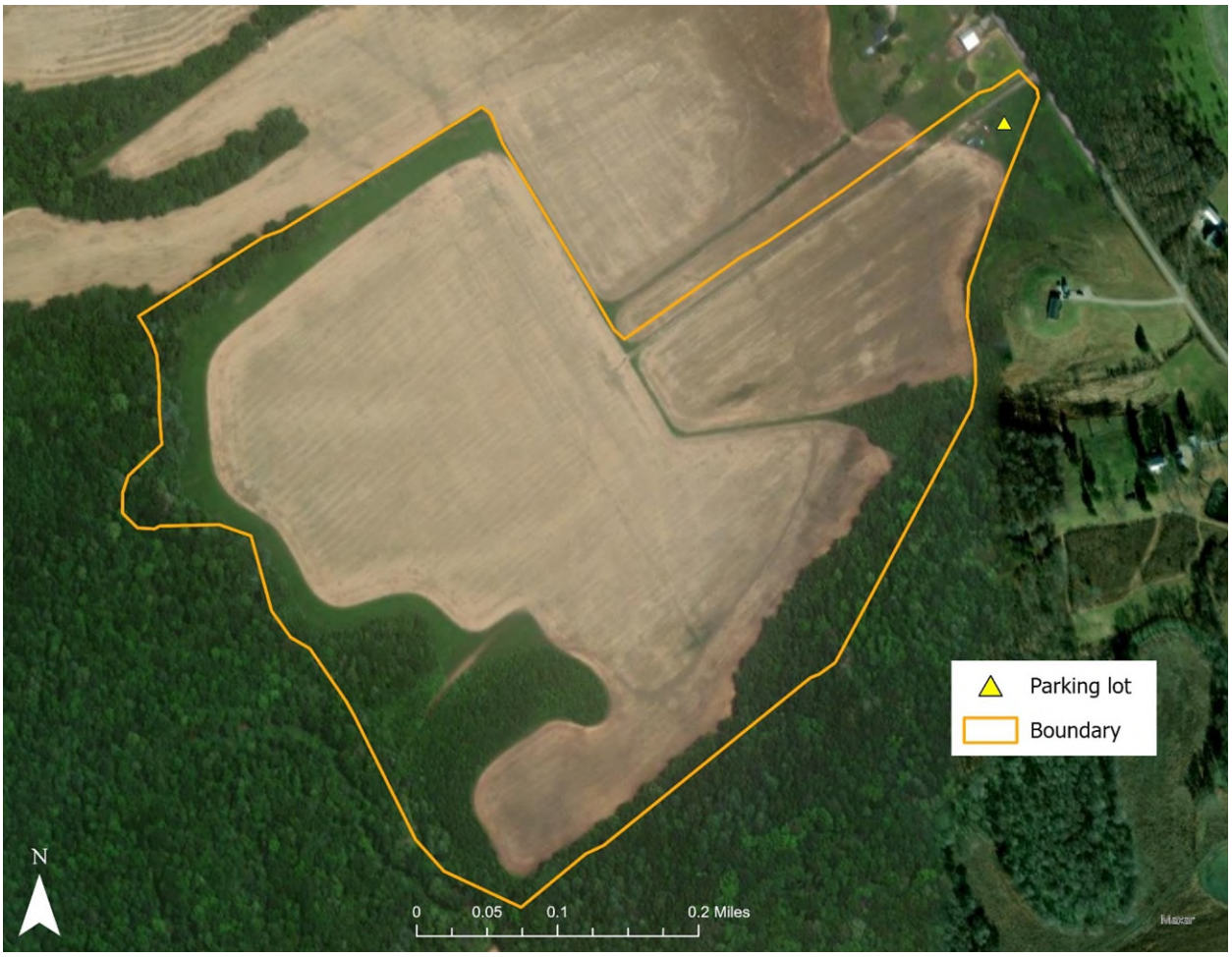
Possum Hollow Wetland, Butler County: Presented to the IRT in 2023, the project is expected to generate over 80 AMU wetland credits. The property acquisition was finalized in 2024. Also in 2024, an additional wetland tract was added to the original project making the total wetland credits expected from this project to be over 100 AMU wetland credits. Also in 2024, FILO staff completed a parking lot and installed fencing and gates. The activities are detailed in the table

below and the location can be seen in the figure. FILO expects to complete the additional property acquisition in 2025.

Table 81: Possum Hollow 2024 IPBI/Maintenance Activities

Date	Staff	Action	Amount	Description
8/7/2024	BW, AG, KS	Parking lot	1 lot	Started clearing area for parking lot to limit unauthorized trespass and promote public access.
8/19/2024	BW, AG, KS, JB	Parking lot	1 lot	Built parking lot to limit unauthorized trespass and promote public access.
8/20/2024	BW,AG, KS, JB	Fence	350 ft fence	Added fence to limit unauthorized trespass and promote public access.
8/20/2024	BW, AG, KS, JB	Gates	2 16-ft gates	Added gates to limit unauthorized trespass and promote public access.
9/12/2024	BW, AG, KS, JB	Parking lot	1 lot	Built parking lot to limit unauthorized trespass and promote public access.
9/16/2024	BW, AG, KS, JB	Parking lot	1 lot	Built parking lot to limit unauthorized trespass and promote public access.

Figure 33: Possum Hollow 2024 IPBI/Maintenance Area



LTM Project Status

In 2024, there were no LTM activities required in the Green River Service Area. The table below describes the LTM site visits that occurred.

Table 82: 2024 LTM Actions in the Green River Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Green	Haney Fork	10/25/2023	Good	Good	Project visited and no actions needed

Table 83: Project Status in the Green River Service Area

Count	Project	Status	County	USACE District	404 Permit #
1	Ivy Creek	CP Approved	Warren	Louisville	LRL-2019-00895
2	Gabbard Branch	CP Approved	Butler	Louisville	LRL-2020-00169
3	Possum Hollow	CP Approved	Butler	Louisville	LRL-2023-00643
4	Bender Hollow	Design/Permit	Lincoln	Louisville	LRL-2018-00982-pgj
5	Big Rivers Wetland	Design/Permit	Union	Louisville	LRL-2016-373-pgj
6	Goose Cr	Monitoring - YR 4	Casey	Louisville	LRL-2012-646-pgj
7	Eagle Cr Trib	Monitoring - YR 8	Union	Louisville	LRL-2012-716 pgj
8	Trammel Cr	Release Pending	Allen	Louisville	LRL-2008-936-pgj
9	Forestland	Released - Long Term Management	Union	Louisville	-
10	Haney Fk	Released - Long Term Management	Butler	Louisville	LRL-2004-01363
1	Green River Lock and Dam 6	Approved - Terminated	Edmonson	Louisville	LRL-2016-43-pgj
2	Boyds Cr	Approved - Terminated	Barren	Louisville	LRL-2013-545-pgj
3	Green River St Forest Wetland	Approved - Terminated	Henderson	Louisville	LRL-2019-00435
4	Gary Branch	Approved - Terminated	Butler	Louisville	LRL-2020-00052
5	Farmers Cr	Approved - Terminated	Webster	Louisville	LRL-2014-58-pgj
6	Trammel Creek II	Approved - Terminated	Allen	Louiville	LRL-2018-00320-pgj

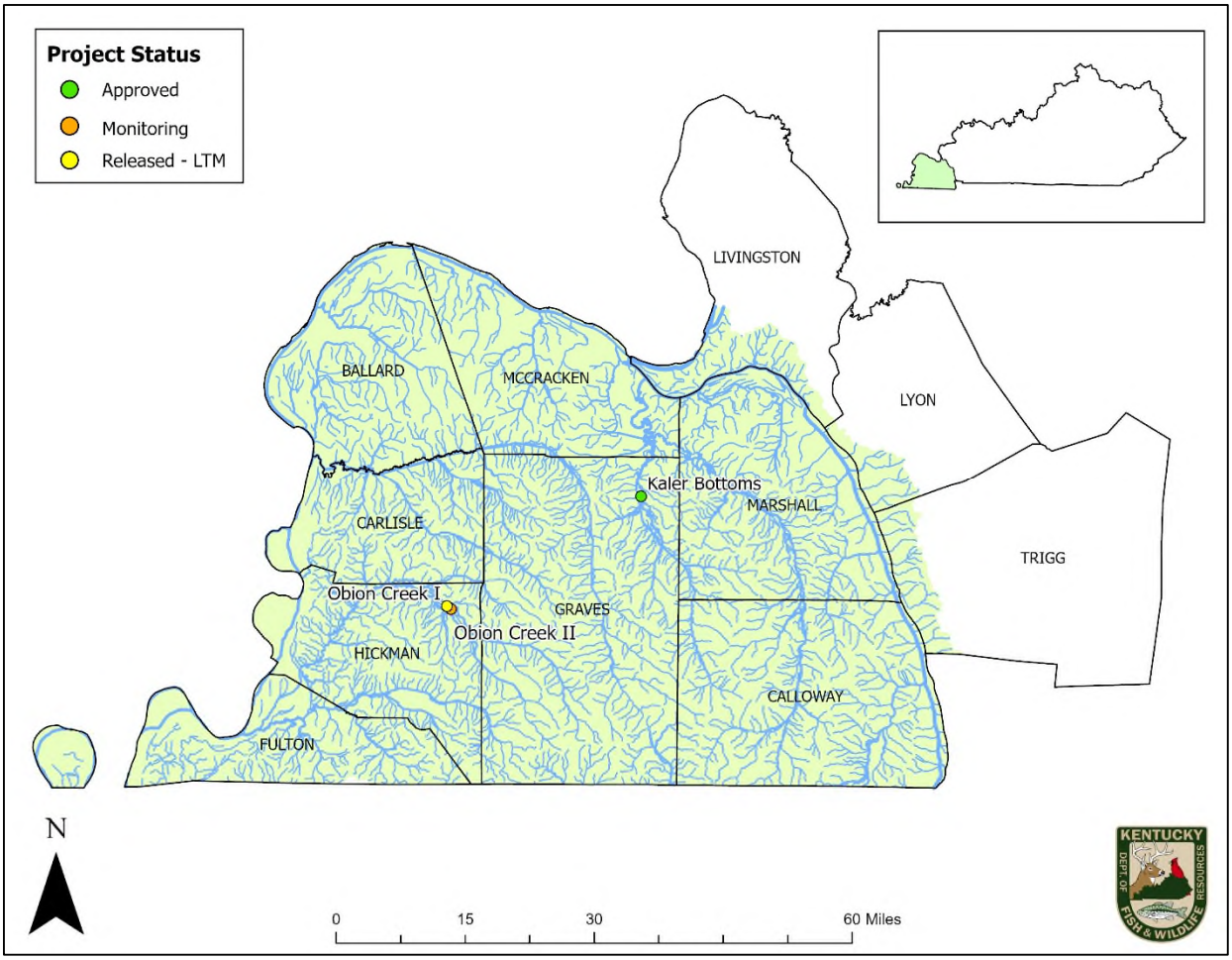
Table 83 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit (i.e., starting construction), where the bulk of design and permitting processes occur. **Table 84** shows a subset of projects that are in these stages of development. For the Green River Service Area, the Big Rivers Wetland project meets the credit sales obligations, and has a pending authorization currently being processed, which should result in a wetland credit release in the first half of 2024. Bender Hollow, a large stream project will have a complete permit application submitted also in the first half of 2024. Three more projects, Gabbard Branch and Ivy Creek and Possum Hollow have IRT approved CPs and will progress to complete permit submittals in 2025. The group will exceed the credit sales obligations to date.

Table 84: Project Status by Permit Milestone between SPI and Construction.

Project	Big Rivers Wetland	Bender Hollow	Gabbard Branch	Ivy Creek	Possum Hollow
KDFWR Service Area	Green	Green	Green	Green	Green
USACE LRL#/LRN#/MVM#	LRL-2016-00373	LRL-2018-00982	LRL-2020-00169	LRL-2019-00895	LRL-2023-00643
Section 7 Submittal	11/14/2022	10/6/2022	2/27/2024	2/27/2024	Summer 2025
Section 7 Concurrence	9/11/2023	8/29/2024	5/15/2024	10/29/2024	Fall 2025
Section 106 Submittal	2/24/2021	6/16/2021	7/25/2024 8/20/2024	7/1/2024	Summer 2025
Section 106 Concurrence	9/28/2022	1/25/2023	Fall 2024	Fall 2024	Fall 2025
IRT Design Review Date	10/4/2019	11/5/2020	9/20/2023	9/20/2023	Winter 2025
JD Site Visit	1/7/2020	1/6/2020	9/25/2023	9/27/2023	Winter 2025
Design Review and PJD comments received	3/31/2020	7/12/2021	12/6/2024	12/12/2024	Spring 2025
Draft MP Submittal	12/8/2020	11/12/2024	Winter 2025	Winter 2025	Spring 2025
Submit Pre-Filing Request	12/8/2020	11/12/2024	Winter 2025	Winter 2025	Spring 2025
401 Application Date	12/8/2023	Spring 2025	Spring 2025	Spring 2025	Summer 2025
401 FP Permit Received	12/12/2023	Summer 2025	Summer 2025	Summer 2025	Fall 2025
401 WQC Permit Received	1/30/2024	Summer 2025	Summer 2025	Summer 2025	Fall 2025
404 Application Date	12/8/2023	Spring 2025	Spring 2025	Spring 2025	Summer 2025
404 Permit Received	5/28/20204	Fall 2025	Fall 2025	Fall 2025	Winter 2026
Begin Construction	Winter 2025	Fall 2025	Winter 2026	Winter 2026	Spring 2026

Jackson Purchase Service Area

Figure 34: Project Status in the Jackson Purchase Service Area 2024



*There are two active projects in this service area and one in the LTM phase. These projects are within the USACE Memphis and Nashville Districts and the KAP region, which utilizes the AMU credit system (**Figure 34**). The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in this service area and 200 AMU advanced wetland credits. **Table 86** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in the service area in CY24 (*

Table 87).

Table 85 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 85 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 35 shows the cumulative credit values of project by major

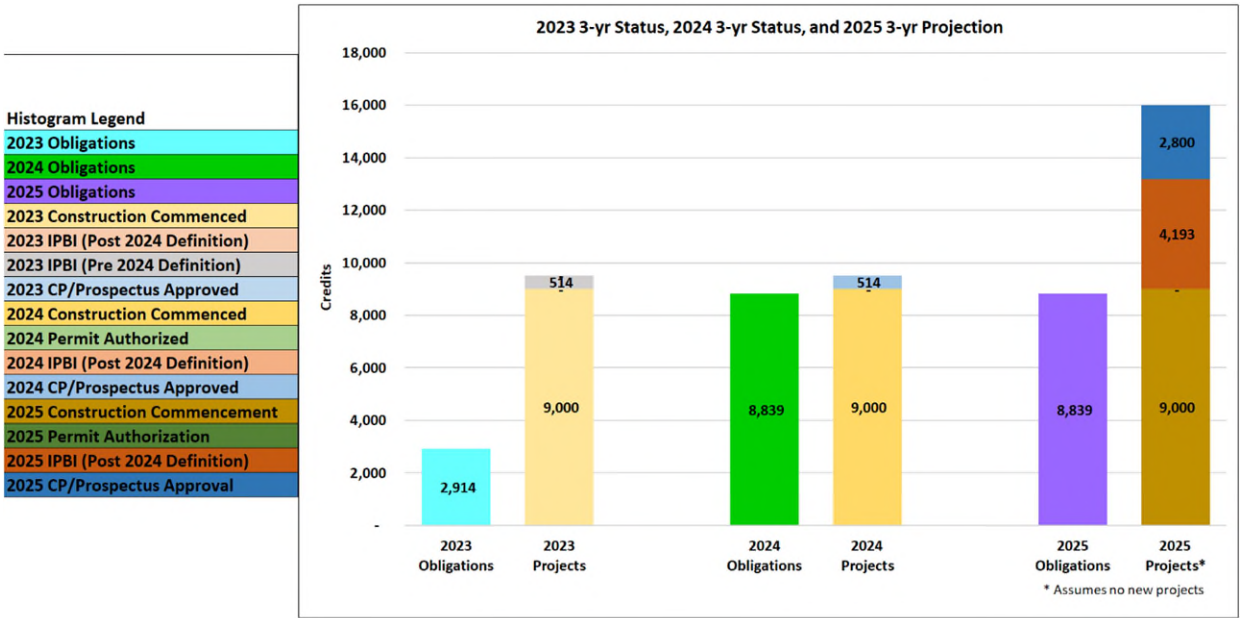
milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 35 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

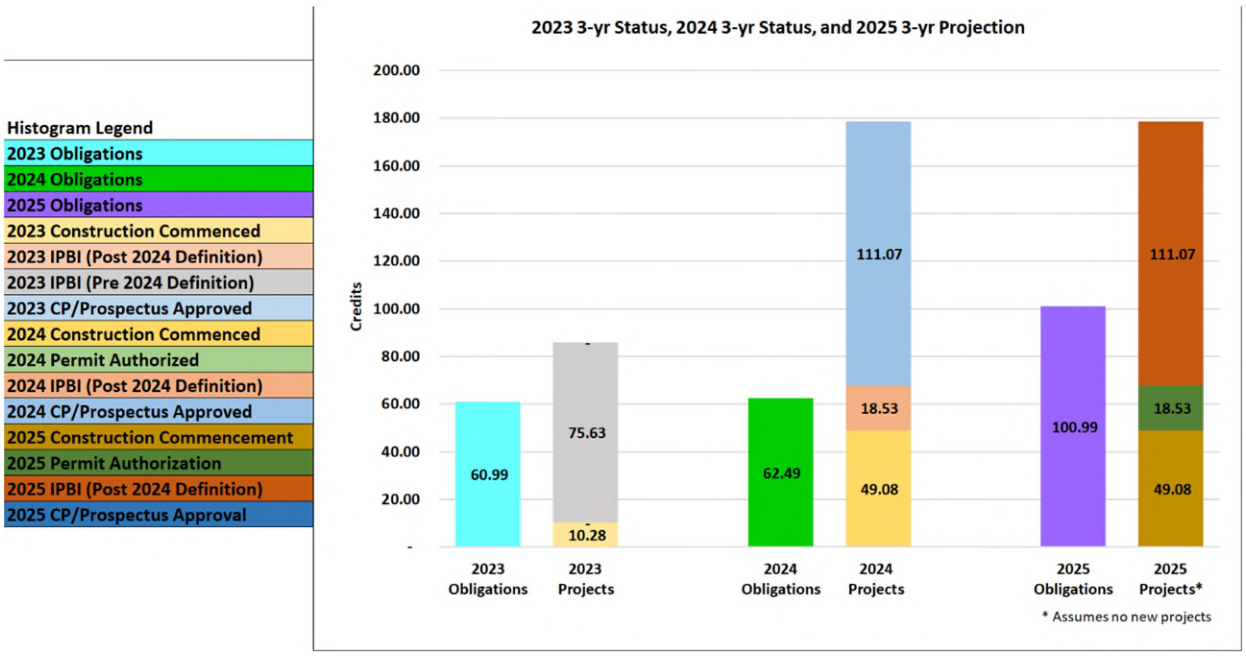
Table 85: Jackson Purchase Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	19.00	19.00	19.00	19.00	19.00	19.00
2012	-	-	-	-	-	-
2013	-	-	-	-	-	-
2014	-	-	-	-	-	-
2015	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49
2016	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00
2017	-	-	-	-	-	-
2017	-	-	-	-	-	-
2018	-	-	-	-	-	-
2018	480.00	480.00	480.00	480.00	480.00	480.00
2019	-	-	-	-	-	-
2020	-	-	-	-	-	-
2020	66.00	66.00	66.00	66.00	66.00	66.00
2021	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00
2022	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	3,299.00	3,299.00	160.51	160.51	160.51	674.21
2024	68.60	68.60	-	-	-	-
Future	-	18,085.61	-	-	-	-
Total	12,207.09	30,292.70	9,000.00	9,000.00	9,000.00	9,513.70

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
Transition	2.300	2.300	2.30	2.30	2.30	2.30
2012	-	-	-	-	-	-
2013	0.820	0.820	0.82	0.82	0.82	0.82
2014	-	-	-	-	-	-
2015	-	-	-	-	-	-
2016	-	-	-	-	-	-
2017	-	-	-	-	-	-
2017	-	-	-	-	-	-
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	-	-	-	-	-	-
2020	-	-	-	-	-	-
2020	3.600	3.600	3.60	3.60	3.60	3.60
2021	4.700	4.700	4.70	4.70	4.70	4.70
2022	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	0.600	0.600	0.58	0.58	0.58	0.60
Future		71.680	-	-	-	7.18
Total	12.020	83.700	12.00	12.00	12.00	19.20

Figure 35: Jackson Purchase comparison of credit sales to project credit values, organized by year and by major milestones. Stream credit, then wetland credit.





Credit Costs, Balances and CY24 Activity

Table 86: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream AMU Regions	Jackson Purchase
Advance Credit Allocation	240,000
CY2024 Beginning Credit Balance	231,160.51
CY2024 Credits Sold	3,299.00
CY2024 Released Credits	-
CY2024 Ending Advance Stream AMU Balance	227,861.51

WETLAND AMUs	Jackson Purchase
Advance Credit Allocation	200.000
CY2024 Beginning Credit Balance	188.580
CY2024 Credits Sold	0.600
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	187.980

Table 87: Credit Costs in the Jackson Purchase Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Jackson Purchase (AMU)	522	522	78,000	78,000

In CY24, FILO sold 522 stream AMUs in the Jackson Purchase River Service Area representing less than 5% of total funds received from receipts over all service areas. In-lieu-fee payments to FILO from mitigation impacts caused by 404-permitted activities including impact types and the

amounts are included in **Table 88**. Full or partial disclosure of records concerning funds can be requested through the Freedom of Information Act (FOIA).

Table 88: Receipts for Purchased Credits including Impact Types

Receipts - type of payment	Amount	Service Area	County	Stream / Wetland	Credits	Perennial Credits	Intermittent Credits	Ephemeral Credits	Wetland Credits
development	$ 46,800.00	JP	Ballard	W	0.6				0.6
other	$ 35,835.26	JP	Hickman	S	68.6				

FILO staff continued their efforts in locating potential project sites in the Jackson Purchase Service Area through various landowner contacts, realtors and KDFWR staff. An IRT site visit was conducted on potential project site Cope Creek in Marshall County and is awaiting IRT approval. Below is a list of active projects in the service area that have been designated LRN numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 91**).

Active Project Status

Obion Creek 2, Hickman County: The Year 5 monitoring report was submitted in December 2021. A compliance inspection was conducted in 2024. We wish to discuss monitoring release with the IRT, allowing the site to enter the LTM Phase.

Kaler Bottoms, Graves County: The IRT approved this project in 2019 and it is estimated to generate 7 AMU wetland credits. In 2020, FILO purchased the 40-acre property. It is now part of the Kaler Bottoms WMA. In 2024, FILO staff walked the property to assess access and trails and installed wetland wells for monitoring.

Table 89: Kaler Bottoms 2024 Maintenance Activities

Date	Staff	Action	Amount	Description
10/17/2024	AG, JB, KS	Access/ foot trails	N/A	Walked property to assess access and foot trails.
10/30/2024	BW	Wetland wells	4 troll wells	Installed wetland wells for pre-construction monitoring.

Cope Creek, Marshall County: In the early stages of development in 2023, this project is expected to generate over 4,000 stream credits and 34 wetland credits. The draft prospectus was submitted in CY24 with an IRT site visit occurred in December 2024.

Rhinehart Branch, Marshall County: In the early stages of development in 2023, the draft prospectus will be submitted by the end of CY24. This project is expected to generate approximately 2,838 preservation credits and 1.5 AMU wetland credits.

LTM Project Status

No LTM activities occurred in the Jackson Purchase Service Area in 2024. **Table 90** below describes the LTM site visits.

Table 90: 2024 LTM Actions in the Jackson Purchase Service Area

Service Area	Project Name	Date Visited	Easement	Stability	Project Notes
Jackson Purchase	Obion I	11/14/2023	Good	Good	Project visited and no actions needed

Table 91: Project Status in the Jackson Purchase Service Area

Count	Project	Status	County	USACE District	404 Permit #
1	Obion Cr 2	Monitoring - YR 5	Hickman	Memphis	MVM-2010-074
2	Kaler Bottoms	Design / Permit	Graves	Nashville	LRL-2019-00536
3	Obion Cr 1	Released - Long Term Management	Hickman	Memphis	200300263
1	East Fork Clark's River	Approved - Terminated	Calloway	Nashville	-

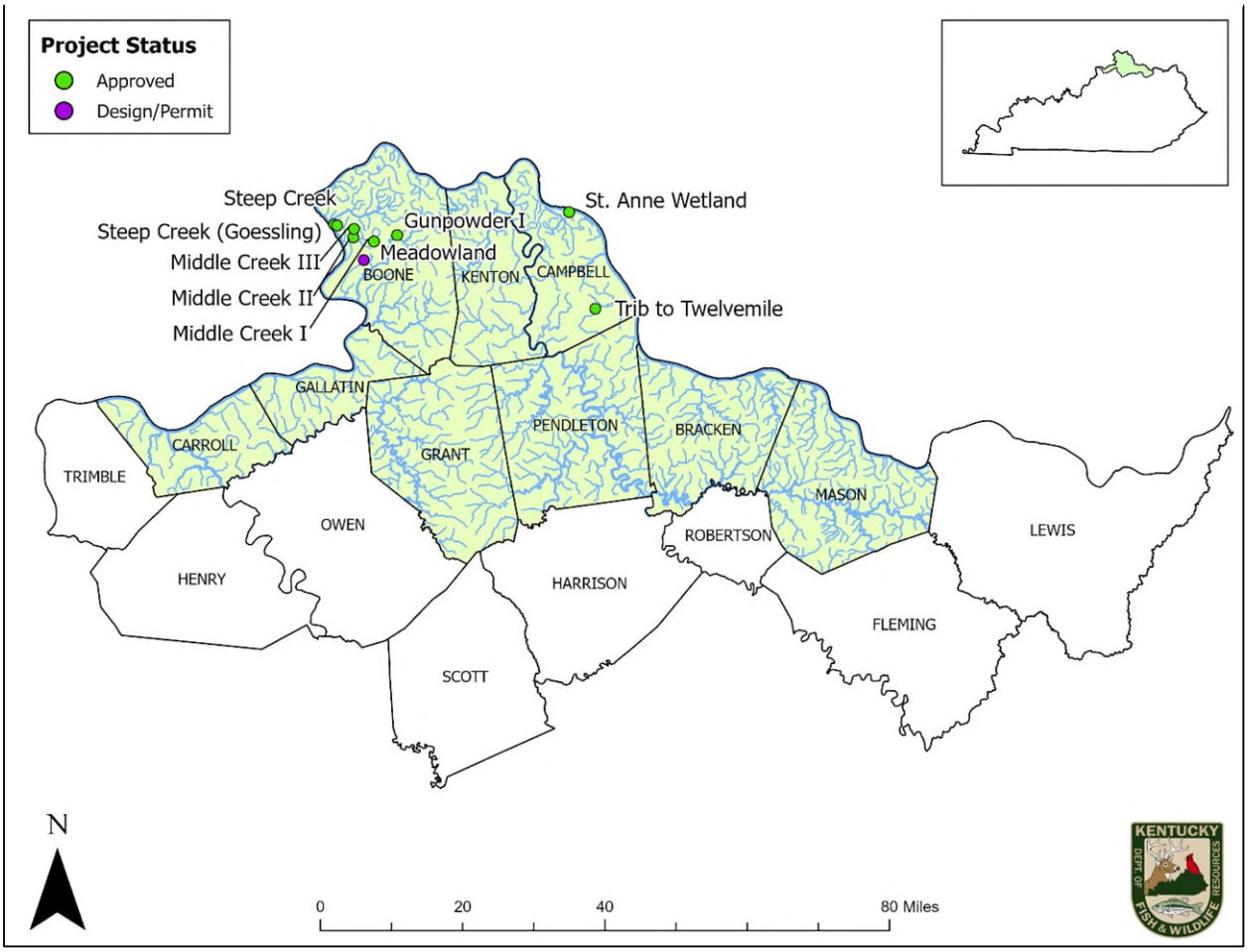
Table 91 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit (i.e., starting construction), where the bulk of design and permitting processes occur. **Table 92** shows a subset of projects that are in these stages of development. For the Jackson Purchase Service Area, Kaler bottoms is a stream and wetland projects that will produce credits that will exceed the current sales obligation through 2020, with approximate schedule as shown. There have been a relatively small number of sales since 2020, and FILO staff have already identified and are currently considering several sites for CP (or prospectus) development and submittal.

Table 92: Project Status by Permit Milestone between SPI and Construction.

Project	Kaler Bottoms
KDFWR Service Area	Jackson Purchase
USACE LRL#/LRN#/MVM#	LRN-2019-00536
Section 7 Submittal	11/16/2023
Section 7 Concurrence	Winter 2025
Section 106 Submittal	8/29/2023
Section 106 Concurrence	Winter 2025
IRT Design Review Date	NA
JD Site Visit	NA
Design Review and PJD comments received	NA
Draft MP Submittal	tbd
Submit Pre-Filing Request	tbd
401 Application Date	tbd
401 FP Permit Received	tbd
401 WQC Permit Received	tbd
404 Application Date	tbd
404 Permit Received	tbd
Begin Construction	tbd

Northern Kentucky Service Area

Figure 36: Project Status in the Northern Kentucky Service Area 2024



There are ten active projects in this service area and none in LTM. These projects are within the USACE Louisville District and the KAP region, which utilizes the AMU credit system (**Figure 36**) The quantity of advanced credits is determined by service area need and program capacity to perform over a period of many years. The Instrument established 240,000 advanced stream credits in each service area, except the Northern Kentucky Service Area, which established 100,000 advanced stream credits. In addition, 100 AMU advanced wetland credits were established in this service area too. A minor instrument modification in CY22 increased the number of advanced stream credits in the Northern Kentucky Service Area to 200,000. **Table 94** shows stream and wetland credit balances and CY24 activity. The cost per credit for stream and wetland did not change in all service areas in CY24 (**Table 95**).

Table 93 shows credit sales, by year alongside the cumulative totals of project credit values that apply to respective major milestones reached in 2024, distributed (vertically) by the years of sales to which those projects apply. Generally, the oldest projects apply to the oldest credit sales. Coloring on the table correlates to milestones as labelled. The information shown in table 93 is an excerpt from the tables in appendix E, which show the same data for all projects, by project, as well as the cumulative milestone values for the previous year (2023) and projections for the upcoming year (2025). Figure 37 shows the cumulative credit values of project by major

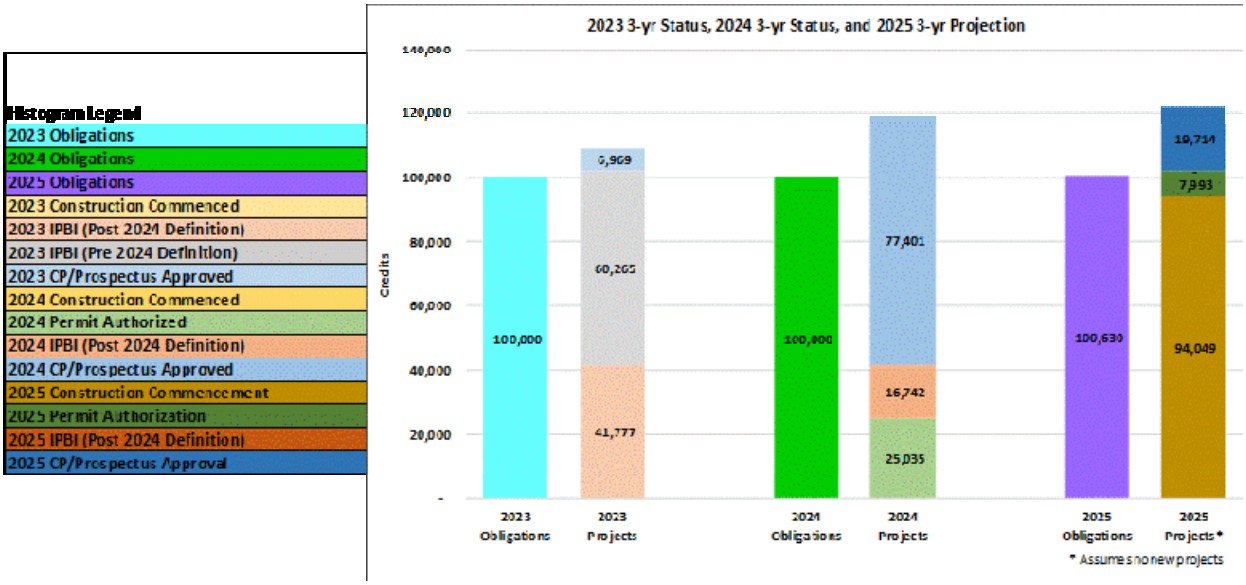
milestone relative to sales for 2023, 2024 and 2025 (projected). Figure 37 shows how credit values of current projects compare to credit sales obligations. It is easy to see that current projects exceed or will exceed credit sales obligations.

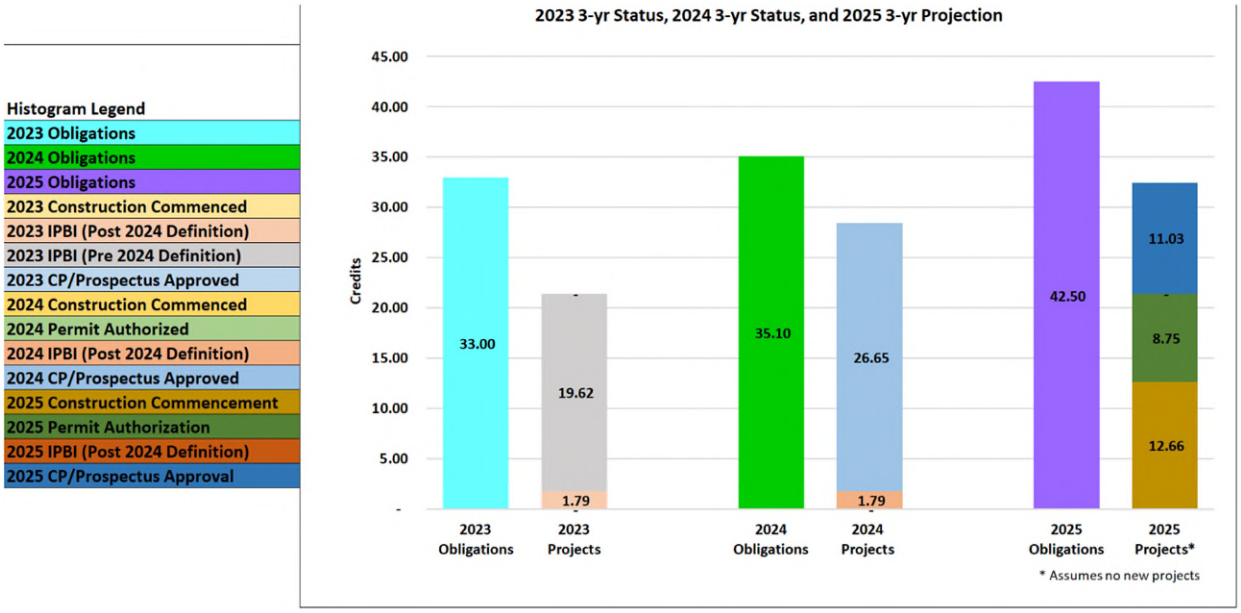
Table 93: Northern Ky Credit Compliance Summary

Stream			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
2018	5,194.00	5,194.0	-	5,194.00	5,194.00	5,194.00
2019	87,682.50	87,682.5	-	19,841.00	36,583.00	87,682.50
2020	7,123.50	7,123.5	-	-	-	7,123.50
2020	-	-	-	-	-	-
2021	-	-	-	-	-	-
2022	-	-	-	-	-	-
2022	630.00	630.0	-	-	-	630.00
2023	5,117.00	5,117.0	-	-	-	5,117.00
2024	1,792.00	1,792.0	-	-	-	1,792.00
Future		44,474.0	-	-	-	11,639.00
Total	107,539.00	152,013.0	-	25,035.00	41,777.00	119,178.00

Wetland			2024	2024	2024	2024
Year	Credits Sold	All Projects	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved
2018	-	-	-	-	-	-
2019	30.700	30.700	-	-	1.79	28.44
2020	0.400	0.400	-	-	-	-
2020	1.900	1.900	-	-	-	-
2021	2.100	2.100	-	-	-	-
2022	6.000	0.404	-	-	-	-
2022	1.400	-	-	-	-	-
2023	0.300	-	-	-	-	-
2024	4.000	-	-	-	-	-
Future		-	-	-	-	-
Total	46.800	35.504	-	-	1.79	28.44

Figure 37: Northern Ky comparison of credit sales to project credit values, organized by year and by major milestones. Stream credit, then wetland credit.





Credit Costs, Balances and CY24 Activity

Table 94: Advance Stream and Wetland Credit Balances and CY24 Activity

Stream AMU Regions	Northern Kentucky
Advance Credit Allocation	300,000
CY2024 Beginning Credit Balance	194,253.00
CY2024 Credits Sold	1,792.00
CY2024 Released Credits	5,990.20
CY2024 Ending Advance Stream AMU Balance	198,451.20

WETLAND AMUs (con't)	Northern Kentucky
Advance Credit Allocation	100.000
CY2024 Beginning Credit Balance	57.200
Credits Withdrawn	5.500
Credits Withdrawn **	-
CY2024 Released Credits	-
CY2024 Ending Advance Wetland AMU Balance	51.700

Table 95: Credit Costs in the Northern Kentucky Service Area

Service Area	Stream		Wetland	
	Cost/Credit		Cost/AMU	
	Beginning CY2024	Ending CY2024	Beginning CY2024	Ending CY2024
Northern Kentucky (AMU)	522	522	78,000	78,000

In CY24, FILO sold 1,792 stream AMUs in the Northern Kentucky River Service Area contributing 1.3M to service area funds and representing less than 20% of total funds received from receipts over all service areas. In-lieu-fee payments to FILO from mitigation impacts caused by 404-permitted activities including impact types and the amounts are included in **Table 96**. Full or partial disclosure of records concerning funds can be requested through the Freedom of Information Act (FOIA).

Table 96: Receipts for Purchased Credits including Impact Types

Receipts - type of payment	Amount	Service Area	County	Stream / Wetland	Credits	Perennial Credits	Intermittent Credits	Ephemeral Credits	Wetland Credits
development	$ 807,534.00	NKY	Boone	S	1,547.0		1,547.0		
development	$ 101,268.00	NKY	Boone	S	194.0		194.0		
development	$ 26,622.00	NKY	Boone	S	51.0			51.0	
development	$ 46,800.00	NKY	Boone	W	0.6				0.6
development	$ 46,800.00	NKY	Boone	W	0.6				0.6
development	$ 23,400.00	NKY	Boone	W	0.3				0.3
development	$ 7,800.00	NKY	Boone	W	0.1				0.1
development	$ 109,200.00	NKY	Boone	W	1.4				1.4
development	$ 39,000.00	NKY	Boone	W	0.5				0.5
development	$ 117,000.00	NKY	Boone	W	1.5				1.5
development	$ 39,000.00	NKY	Kenton	W	0.5				0.5

FILO staff continued their efforts in locating potential project sites in the Northern Kentucky River Service Area through various landowner contacts, local governments, conservancy groups, KDFWR staff and consultants. Site visits were conducted along Godby Creek and a potential new wetland project was initiated Below is a list of active projects in the service area that have been designated LRL numbers from the USACE. Projects that have been terminated had significant efforts to successfully move forward but were not continued due to either property issues such as mineral rights or title concerns, high cost, landowner risk concerns or other issues. Expenses associated with projects that begin development but are not completely pursued are absorbed by administrative or reserve funds, as appropriate. Terminated or shelved projects do not result in less mitigation obligation and have not reduced available project funding (**Table 99**).

Active Project Status

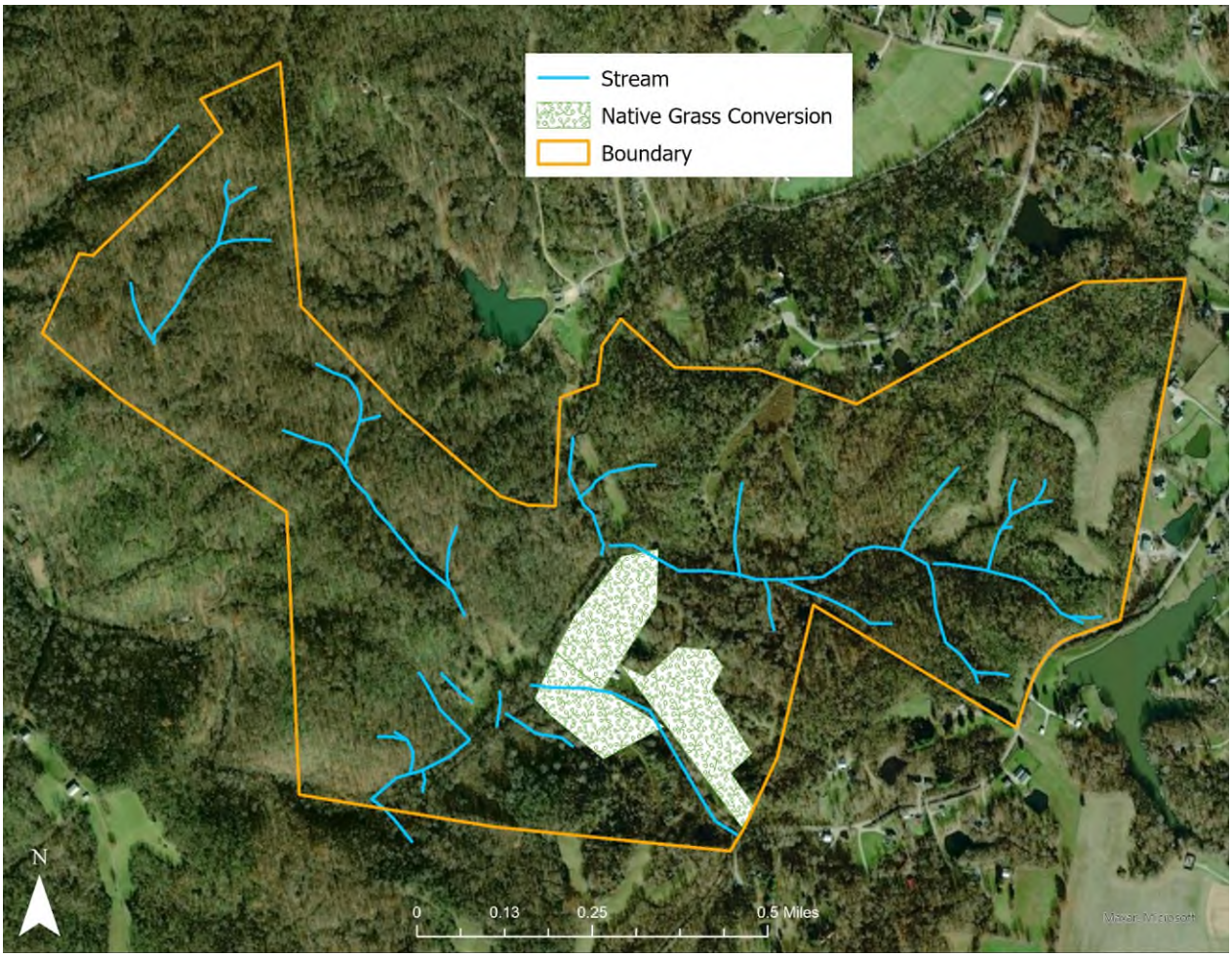
Meadowland, Boone County: IRT approved in 2020, this project was presented as part of a Full Delivery contract with Stantec Consulting Services Inc. It is expected to generate over 20,000 AMU stream credits and will be permanently protected with a third-party conservation easement. In 2021, FILO (and Stantec Consulting Services, Inc.) conducted the Preliminary Design/JD and Assessment Verification meetings, submitted the Mitigation Plan, and received concurrence for Section 106 of the National Historic Preservation Act. In 2022, FILO (and Stantec Consulting Services, Inc.) conducted the Preliminary Design/JD and Assessment Verification Meetings on an additional tract and received Section 7 concurrence. The draft Mitigation Plan was submitted in 2023 and comments were received from the Corps. In 2024, FILO (and Stantec Consulting Services, Inc.) finalized the Mitigation Plan and applied for and received the 401 Water Quality Certification and 404 Department of Army Permit. Construction is set to commence in early 2025.

Middle Creek I, Boone County: This project is located about two miles upstream of the Middle Creek II project. The IRT approved the project in 2019, and it is expected to produce approximately 19,000 AMU stream credits. FILO closed on the property in 2021, executing livestock removal and vehicle access restrictions. In 2022 FILO conducted the Preliminary Design/JD and Assessment Verification meetings and started developing the design and Mitigation Plan. In 2023, FILO submitted a Phase I Archaeological Report and Cultural Resources Report for Section 106 of the National Historic Preservation Act, the design and Mitigation Plan were mostly complete, and biological sampling continued. Also in 2023, FILO staff continued with IPBI invasive removal, mainly bush honeysuckle (*Lonicera maackii*). FILO staff continued IPBI efforts in 2024 by starting native grass conversion, shown in the table and figure below. This native grass plot preparation will be completed by fall 2025. Also in 2024, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and received Section 7 and 106 concurrences. Additionally, FILO finalized the Mitigation Plan (combined with Middle Creek II and III) and applied for KDOW Floodplain Permit, 401 Water Quality Certification, and 404 Department of Army Permit. FILO received the KDOW Floodplain Permit in 2024 and expects to receive the 401 Water Quality Certification, and 404 Department of Army Permit in 2025.

Table 97: Middle Creek I (LIM) 2024 IPBI Activities

Date	Staff	Action	Amount	Description
8/12/2024	BW, AG	Native grass conversion	260 gallons	Prepped area for native grass conversion by spraying 3% glyphosate with a tractor sprayer.
Gallons** represents the amount of diluted chemicals used to prep area for native grass planting.				

Figure 38: Middle Creek I (LIM) 2024 IPBI Treatment Area



Middle Creek II, Boone County: This project is located about two miles downstream of the Middle Cr I project and consists of three properties: Boone County's Middle Creek Park, the Camargo tract of the Boone Conservancy, and a portion of the Dinsmore Homestead currently leased to Boone County as part of Middle Creek Park. FILO has completed the boundary surveys and closed on conservation easements on all three tracts. In 2022, FILO conducted the Preliminary Design/JD and Assessment Verification meetings. The design and the Mitigation Plan were largely completed by the end of 2023. FILO staff completed most of the IPBI invasive

removal in 2022 and re-treated in the beginning of January to complete bush honeysuckle (*Lonicera maackii*) removal. The county park staff treated some invasive species prior to FILO, so the site was able to be treated quickly. The table and figure below describe the event and area treated. In 2024, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and received Section 7 and 106 concurrences. Also in 2024, FILO finalized the Mitigation Plan (combined with Middle Creek I and III) and applied for KDOW Floodplain Permit, 401 Water Quality Certification, and 404 Department of Army Permit. FILO received the KDOW Floodplain Permit in 2024 and expects to receive the 401 Water Quality Certification, and 404 Department of Army Permit in 2025. FILO staff completed the IPBI invasive removal in 2023 and no additional IPBI activities were completed in 2024.

Middle Creek III, Boone County: This project is on a tributary of Middle Creek upstream of the Middle Creek II project. It was approved by the IRT in 2019 and the fee simple purchase of the 165-acre property was completed in late 2020, along with initiation of invasive vegetation control, livestock and vehicle access restrictions. The Preliminary Design/JD and Assessment Verification meetings have been completed; the design, as with the other two Middle Creek projects, are well underway. In 2024, FILO submitted the Biological Assessment for Section 7 of the Endangered Species Act and received Section 7 concurrence. Also in 2024, FILO finalized the Mitigation Plan (combined with Middle Creek I and II) and applied for KDOW Floodplain Permit, 401 Water Quality Certification, and 404 Department of Army Permit. FILO received the KDOW Floodplain Permit in 2024 and expects to receive the 401 Water Quality Certification, and 404 Department of Army Permit in 2025.

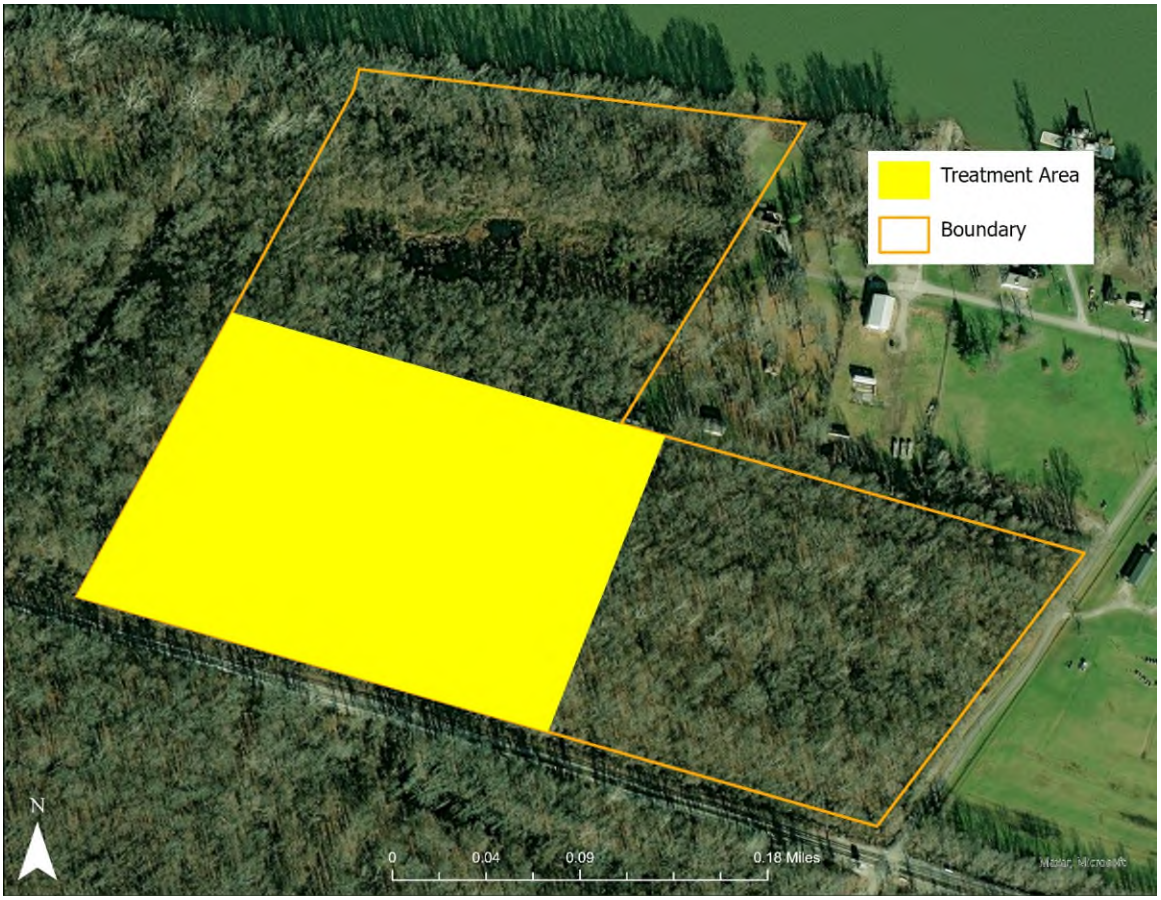
Steep Creek, Boone County: This project is expected to generate over 20,000 AMU stream credits. A second landowner and additional watershed upstream of the original project area was added in 2022. In 2023, FILO closed on the conservation easement with the original landowner. The survey is proceeding on the second landowner property and closing will occur early in 2024. The Preliminary Design/JD and Assessment Verification meetings were previously completed, and the design and Mitigation Plan are now well underway at the end of 2023. Also in 2024, FILO finalized the Mitigation Plan and applied for KDOW Floodplain Permit, 401 Water Quality Certification, and 404 Department of Army Permit. FILO received the KDOW Floodplain Permit and the 401 Water Quality Certification in 2024 and expects to receive the 404 Department of Army Permit in 2025. FILO staff treated most of the site for invasive species in 2022, but the Goessling tract was added and treated in 2023.

St. Anne Wetland, Campbell County. Presented to the IRT in 2020 and CP approved in 2021, the project is expected to generate almost 9 wetland AMU credits. In 2022, FILO was in the land contract phase for the conservation easement. In 2023, FILO completed the final easement boundary survey and closed on the property to execute the SPI and begin invasive vegetation removal. In 204, FILO began developing the design and Mitigation Plan. FILO continued invasive species treatment in 2024. The event is detailed in the table and figure below.

Table 98: St. Anne Wetland 2024 IPBI Activities

Date	Staff	Action	Amount	Description
1/2/2024	BP, MZ	Invasive treatment	0.8 gallons	Removed woody invasive species via cut-stump methods with 50% glyphosate. Species targeted: Bush honeysuckle, Multiflora rose, Chinese privet
Gallons** represents the amount of diluted chemicals used to treat invasive species.				

Figure 39: St. Anne Wetland 2024 IPBI Treatment Area



Gunpowder I, Boone County. The project is on the property of the YMCA and Boone County's Gunpowder Creek Nature Park. Presented to the IRT in 2020, the CP was approved in 2021, the project is 116 acres of proposed restoration in the Gunpowder Creek watershed and is expected to produce about 7,000 AMU credits. In 2022, FILO worked with YMCA staff to determine the conservation easement boundary and trail locations. We are expecting resolution of easement extent and conditions in 2025.

Trib to Twelvemile Creek, Campbell County: The IRT approved the project in 2021. Located on 266 acres, it is expected to produce about 8,000 AMU credits. In 2022, FILO began the land contract phase for the conservation easement and continued working with the landowners in

2023 to determine the easement boundary and trail locations and mostly complete the survey. In 2024, FILO complete the easement acquisition and will begin design and Mitigation Plan development early in 2025. FILO staff treated the site for invasive species in 2023 but no additional IPBI efforts were completed in 2024.

Tribs to Gunpowder / Riddles Run, Boone County: A portion of the project is upstream of several tributaries to the Gunpowder II project. The project will add to the Gunpowder II project and provide other mitigation in the adjacent Riddles Creek watershed. Approved in 2021 by the IRT, it is located on 293 acres and is expected to produce 6,829 AMU credits. The project is on hold pending approval of the Gunpowder II project by the Boys Scouts of America.

Big Bone Lick, Boone County. The project began in 2018 with a feasibility study of removing part of the dam to drain a 5-acre lake that was leaking. The project evolved to consist of: re-establishing the stream channel through the lake; restoring tributary channels upstream of the lake and downstream from the dam to Big Bone Lick Creek; and re-establishing and enhancing wetland in the bottomlands along Big Bone Creek. An MOU with Dept. of Parks was drafted in 2023. An onsite meeting with USACE and KY Parks led to additional delineation of more areas to include for wetland mitigation, which will be completed and re-submitted early in 2024.

LTM Project Status

There are no projects in the Northern Kentucky Service Area that have entered the LTM phase.

Table 99: Project Status in the Northern Kentucky Service Area

Count	Project	Status	County	USACE District	404 Permit #
1	St. Anne Wetland	CP Approved	Campbell	Louisville	LRL-2020-000186
2	Gunpowder I	CP Approved	Boone	Louisville	LRL-2019-00590
3	Steep Cr	CP Approved	Boone	Louisville	LRL-2018-00383
4	Fourmile	CP Approved	Campbell	Louisville	LRL-2022-00820
5	Trib to Twelve Mile Cr	CP Approved	Campbell	Louisville	LRL-2021-00105
6	Tribs Riddles Run / Gunpowder	CP Approved	Boone	Louisville	LRL-2021-00104
7	Middle Cr I	Design/Permit	Boone	Louisville	LRL-2019-161
8	Middle Cr II	Design/Permit	Boone	Louisville	LRL-2019-01052
9	Middle Cr III	Design/Permit	Boone	Louisville	LRL-2019-00590
10	Meadow Land	Design/Permit	Boone	Louisville	LRL-2020-00184
1	Steel Cr	Approved - Terminated	Gallatin	Louisville	LRL-2018-00725
2	Second Creek	Approved - Terminated	Boone	Louisville	LRL-2021-00411

Table 99 shows a list of all past and current projects by status at a course level. In many cases it is helpful to see a higher resolution of project status for the time between the execution of SPI and a fully authorized permit (i.e., starting construction), where the bulk of design and permitting processes occur. **Table 100** shows a subset of projects that are in these stages of development. For the Northern Kentucky Service Area, all projects shown in **Table 100** are on schedule as shown.

Table 100: Project Status by Permit Milestone between SPI and Construction.

Project	Meadowland FD	Middle Creek 1	Middle Creek 2	Middle Creek 3	Steep Creek	St. Anne	Trib to Twelvemile
KDFWR Service Area	Northern Kentucky	Northern Kentucky	Northern Kentucky	Northern Kentucky	Northern Kentucky	Northern Kentucky	Northern Kentucky
USACE LRL#/LRN#/MVM#	LRL-2020-00184	LRL-2019-161	LRL-2019-01052	LRL-2019-00590	LRL-2020-00187	LRL-2020-00186	LRL-2021-00105
Section 7 Submittal	4/5/2022	7/8/2024	7/8/2024	7/8/2024	7/8/2024	Winter 2025	Summer 2025
Section 7 Concurrence	12/5/2022	10/28/2024	10/28/2024	10/28/2024	10/28/2024	Spring 2025	Fall 2025
Section 106 Submittal	4/10/2020	7/19/2023	8/9/2023	NA	8/9/2023	Winter 2025	Summer 2025
Section 106 Concurrence	4/29/2021	8/21/2024	8/21/2024	NA	8/21/2024	Spring 2025	Fall 2025
IRT Design Review Date	2/2/2021	3/21/2022	3/21/2022	3/21/2022	9/23/2022	Winter 2025	Spring 2025
JD Site Visit	2/5/2021 3/3/2022	3/28/2022	3/28/2022	3/28/2022	10/3/2022	Winter 2025	Spring 2025
Design Review and PJD comments received	3/26/2021 6/30/2022	5/18/2023	5/18/2023	5/18/2023	5/18/2023	Winter 2025	Spring 2025
Draft MP Submittal	10/29/2021	2/29/2024	2/29/2024	2/29/2024	7/3/2024	Winter 2025	Summer 2025
Submit Pre-Filing Request	10/29/2021	2/29/2024	2/29/2024	2/29/2024	7/8/2024	Winter 2025	Summer 2025
401 Application Date	2/28/2024	9/27/2024	9/27/2024	9/27/2024	10/15/2024	Summer 2025	Fall 2025
401 FP Permit Received	NA	10/18/2024	10/18/2024	10/18/2024	10/16/2024	Fall 2025	Winter 2026
401 WQC Permit Received	8/13/2023	Winter 2025	Winter 2025	Winter 2025	12/18/2024	Fall 2025	Winter 2026
404 Application Date	2/28/2024	9/27/2024	9/27/2024	9/27/2024	10/15/2024	Summer 2025	Fall 2025
404 Permit Received	11/27/2024	Spring 2025	Spring 2025	Spring 2025	Spring 2025	Winter 2026	Spring 2026
Begin Construction	Winter 2025	Fall 2025	Fall 2025	Fall 2025	Fall 2025	Spring 2026	Fall 2026

References

U.S. Army Corps of Engineers. 2018. Modification of the Agreement Concerning In-Lieu Mitigation Fees between U.S. Army Corps of Engineers and Kentucky Department of Fish and Wildlife Resources. Modification #8 Adding a Northern Kentucky Service Area. LRL-2010-325.

U.S. Army Corps of Engineers. 2011. Modification – Number One of the Agreement Concerning In-Lieu Mitigation Fees between U.S. Army Corps of Engineers and Kentucky Department of Fish and Wildlife Resources. LRL-2010-325.

U.S. Army Corps of Engineers. 2008. 33 CFR Chapter II Part 332. Compensatory Mitigation for Losses of Aquatic Resources. Federal Register Vol. 73, No. 70, April 10, 2008.

Appendix A – CY24 Credit Sales, Costs and Balances

CY2024 Advanced Credit Sales and Balance

Service Area	Date of Payment	Corps 404 Id. No.	Credits Sold	$/Credit	Advanced Credits	Balance
Big Sandy Stream (EIU)					CY2024 Beginning Balance	204,353.66
					CY2024 Credit Sales	-
					CY2024 Credit Releases	9,281.00
	CY2024 TOTAL CREDITS SOLD				CY2024 Ending Balance	213,634.66
Upper Kentucky Stream (EIU)					CY2024 Beginning Balance	205,327.37
					CY2024 Credit Sales	-
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**-**		CY2024 Ending Balance	205,327.37
Upper Licking Stream (EIU)					CY2024 Beginning Balance	225,846.40
					CY2024 Credit Sales	-
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD				CY2024 Ending Balance	225,846.40
Upper Cumberland Stream (EIU)	01/24/24	LRL-2021-00354	265.00	1,183	CY2024 Beginning Balance	227,380.89
	05/31/24	LRN-2015-00557	953.50	1,183	CY2024 Credit Sales	2,601.50
	10/07/24	LRL-2023-00885	386.00	1,183	CY2024 Credit Releases	-
	10/31/24	LRL-2023-00755	997.00	1,183	CY2024 Ending Balance	224,779.39
	CY2024 TOTAL CREDITS SOLD		**2,601.50**			
Lower Kentucky Stream (AMU)	02/22/24	LRL-2009-00611	28.20	395	CY2024 Beginning Balance	212,668.80
	03/04/24	LRL-2012-00263	203.00	395	CY2024 Credit Sales	231.20
					CY2024 Credit Releases	18,452.00
	CY2024 TOTAL CREDITS SOLD		**231.20**		CY2024 Ending Balance	230,889.60
Lower Licking Stream (AMU)	03/28/24	LRL-2010-00891	593.00	490	CY2024 Beginning Balance	207,453.93
					CY2024 Credit Sales	593.00
					CY2024 Credit Releases	
	CY2024 TOTAL CREDITS SOLD		**593.00**		CY2024 Ending Balance	206,860.93
Lower Cumberland Stream (AMU)	05/03/24	LRL-2016-00461 (2)	174.00	528	CY2024 Beginning Balance	173,178.59
					CY2024 Credit Sales	174.00
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**174.00**		CY2024 Ending Balance	173,004.59
Salt Stream (AMU)	02/07/24	LRL-2022-00633	2,253.00	518	CY2024 Beginning Balance	106,624.96
	08/08/24	LRL-2022-00540	3,157.00	518	CY2024 Credit Sales	9,859.00
	08/30/24	LRL-2023-00187	3,087.00	518	CY2024 Credit Releases	14,699.00
	09/30/24	LRL-2024-00296	854.00	518	CY2024 Ending Balance	111,464.96
	11/20/24	LRL-2023-00870	508.00	518		
	CY2024 TOTAL CREDITS SOLD		**9,859.00**			
Green River Stream (AMU)	02/02/24	LRL-2021-00265	6,234.00	549	CY2024 Beginning Balance	113,347.94
	04/17/24	LRL-2023-00168	1,970.00	549	CY2024 Credit Sales	8,398.00
	04/18/24	LRL-2023-00618	194.00	549	CY2024 Credit Releases	2,998.00
	CY2024 TOTAL CREDITS SOLD		**8,398.00**		CY2024 Ending Balance	107,947.94
Jackson Purchase Stream (AMU)	02/22/24	MVM-2010-00074	68.60	522	CY2024 Beginning Balance	227,861.51
					CY2024 Credit Sales	68.60
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**68.60**		CY2024 Ending Balance	227,792.91
Northern Kentucky Stream (AMU)	03/12/24	LRL-2023-00428	1,547.00	522	CY2024 Beginning Balance	194,253.00
	03/20/24	LRL-2023-00650	194.00	522	CY2024 Credit Sales	1,792.00
	09/10/24	LRL-2022-00452	51.00	522	CY2024 Credit Releases	5,990.20
	CY2024 TOTAL CREDITS SOLD		**1,792.00**	522	CY2024 Ending Balance	198,451.20

CY2024 Advanced Credit Sales and Balance (con't)

Service Area	Date of Payment	Corps 404 Id. No.	Credits Sold	$/Credit	Advanced Credits	Balance
Upper Kentucky Wetland (AMU)	03/01/24	LRL-2021-00894	0.400	78,000	CY2024 Beginning Balance	73.940
	06/17/24	LRL-2018-00540	0.400	78,000	CY2024 Credit Sales	9.400
	08/19/24	LRL-2021-00071	7.000	78,000	CY2024 Credit Releases	-
	09/18/24	LRL-2017-00149	1.400	78,000	CY2024 Ending Balance	64.540
	09/24/24	LRL-2024-00108	0.200	78,000		
	CY2024 TOTAL CREDITS SOLD		**9.400**			
Upper Licking Wetland (AMU)					CY2024 Beginning Balance	79.380
					CY2024 Credit Sales	-
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**-**		CY2024 Ending Balance	79.380
Upper Cumberland Wetland (AMU)					CY2024 Beginning Balance	-
					CY2024 Credit Sales	-
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**-**		CY2024 Ending Balance	-
*Nashville Corps advanced credits withdrawn						
Big Sandy Wetland (AMU)					CY2024 Beginning Balance	93.439
					CY2024 Credit Sales	-
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**-**		CY2024 Ending Balance	93.439
Salt River Wetland (AMU)	07/05/23	LRL-2020-891	1.400	78,000	CY2024 Beginning Balance	88.537
	07/18/23	LRL-2022-630	8.900	78,000	CY2024 Credit Sales	11.900
	09/01/23	LRL-2022-203	1.000	78,000	CY2024 Credit Releases	-
	10/11/23	LRL-2022-469	0.200	78,000	CY2024 Ending Balance	76.637
	10/13/23	LRL-2020-960	0.400	78,000		
	CY2024 TOTAL CREDITS SOLD		**11.900**			
Green River Wetland (AMU)	05/31/24	LRN-2015-00557	2.100	78,000	CY2024 Beginning Balance	96.412
	11/20/24	LRL-2024-00666	0.700	78,000	CY2024 Credit Sales	2.800
				78,000	CY2024 Credit Releases	9.970
	CY2024 TOTAL CREDITS SOLD		**2.800**		CY2024 Ending Balance	103.582
Jackson Purchase Wetland (AMU)	08/13/24	LRL-2022-00331	0.600	78,000	CY2024 Beginning Balance	188.580
					CY2024 Credit Sales	0.600
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**0.600**		CY2024 Ending Balance	187.980
Lower Licking Wetland (AMU)					CY2024 Beginning Balance	93.520
					CY2024 Credit Sales	-
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**-**		CY2024 Ending Balance	93.520
Lower Cumberland Wetland (AMU)					CY2024 Beginning Balance	-
					CY2024 Credit Sales	-
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**-**		CY2024 Ending Balance	-
*Nashville Corps advanced credits withdrawn						
			.			
Lower Kentucky Wetland (AMU)	06/07/24	LRL-2024-00197	0.400	78,000	CY2024 Beginning Balance	82.868
					CY2024 Credit Sales	0.400
					CY2024 Credit Releases	-
	CY2024 TOTAL CREDITS SOLD		**0.400**		CY2024 Ending Balance	82.468
Northern Kentucky Wetland (AMU)	03/01/24	LRL-2022-688	0.600	78,000	CY2024 Beginning Balance	57.200
	03/20/24	LRL-2022-00061	0.400	78,000	CY2024 Credit Sales	5.500
	05/22/24	LRL-2024-00211	1.200	78,000	CY2024 Credit Releases	-
	08/30/24	LRL-2023-00187	2.400	78,000	CY2024 Ending Balance	51.700
	CY2024 TOTAL CREDITS SOLD		**4.600**			

Appendix B – Permitted Compensatory Mitigation Projects

Table of Corps Approved Mitigation Projects: KDFWR Mitigation Program - Louisville LRL-2010-325							
PROJECT	COUNTY	SERVICE AREA	Instrument Mod. No.	404 PERMIT ID.NO.	404 PERMIT APPROVAL DATE	401 WQC ID. NO.	401 WQC APPROVAL DATE
ILF-KDFWR Elm Fork/Kleber WMA Stream Restoration Project (MOA)	Owen	Lower Kentucky River Service Area	2	LRL-2012-00263	02/12/13	2012-050-1	10/22/12
ILF-KDFWR Indian Creek Stream Restoration Project (MOA)	Menifee	Upper Kentucky River Service Area	3	LRL-2012-00273	07/09/13	2013-009-1	03/07/13
ILF-KDFWR Roger's Gap Stream Restoration Project (MOA)	Scott	Lower Kentucky River Service Area	4	LRL-2012-00134	12/04/13	2013-026-1	06/26/13
ILF-KDFWR Eagle Creek Tributaries Restoration Project (MOA & ILF-I)	Union	Green River Service Area	5	LRL-2012-00716	01/16/15	2014-18-1M	06/04/14
ILF-KDFWR Myer's Station Stream Restoration (ILF-I)	Nicholas	Lower Licking River Service Area	6	LRL-2012-00637	04/20/16	2016-004-1	01/15/16
ILF-KDFWR Old Trace Creek Restoration (ILF-I)	Lewis	Big Sandy River Service Area	7	LRL-2013-00336	02/13/17	2016-029-1	04/26/16
KDFWR ILF Instrument Full Modification (to add 9 counties/change SA)	All	9 County Region	8	LRL-2010-325		NA	
ILF-KDFWR Goose Creek Restoration (ILF-I)	Casey	Green River Service Area	9	LRL-2012-00646	03/23/17	2016-090-7	09/21/16
ILF-KDFWR Minor's Creek Restoration (ILF-I)	Owen, Franklin	Lower Kentucky River Service Area	10	LRL-2013-00091	05/22/17	2016-097-1	10/31/16
ILF-KDFWR Ross Creek Stream & Wetland Restoration Phase I & II (MOA & ILF-I)	Lee, Estill	Upper Kentucky River Service Area	11	LRL-2013-00143	10/26/17	2016-111-7R	09/25/17
ILF-KDFWR Red Oak Creek Restoration Project, Drainage C (ILF-I)	Owen	Lower Kentucky River Service Area	12	LRL-2014-00500	04/17/18	2017-091-1	12/18/17
ILF-KDFWR Big Farm Indian Creek Restoration Project (ILF-I)	Bath	Lower Licking River Service Area	13	LRL-2014-00209	05/30/19	2019-001-7	10/05/18
ILF-KDFWR-Whites Creek Stream Restoration Project (ILF-I)	Boyd	Big Sandy River Service Area	14	LRL-2012-634	10/18/21	2018-015-7MR3	03/05/18
Ed Mabry – Laurel Gorge WMA Stream Restoration Project	Elliott	Big Sandy River Service Area	15	LRL-2013-00858 LRL-2013-01013 LRL-2012-00478	05/14/20	2020-036-1M	06/14/21
ILF-KDFWR-Instrument Modification increasing advanced stream credits in the NKSA and increasing advanced wetland credits in SRSA		Salt River Service Area and Northern Ky Service Areas	16	LRL-2010-00325 LRN-2011-709 MVM-2011-00521	03/11/22	NA	NA
ILF-KDFWR - Big Lick Hollow Stream Restoration Project Phase I (ILF-I)	Nelson	Salt River Service Area	17	LRL-2018-00383	08/06/23	2022-121-1	10/27/22
ILF-KDFWR - Harrison Fork Stream Restoration Project (ILF-MOA)	Nelson	Salt River Service Area	18	LRL-2012-00274	09/13/23	2019-046-1R3	05/20/22

Table of Corps Approved Mitigation Projects: KDFWR Mitigation Program - Nashville LRN-2011-00709							
PROJECT	COUNTY	SERVICE AREA	Instrument Mod. No.	404 PERMIT ID.NO.	404 PERMIT APPROVAL DATE	401 WQC ID. NO.	401 WQC APPROVAL DATE
Sinking Valley Preservation Project	Pulaski	Upper Cumberland	2	LRN-2012-00326	12/11/2013	n/a	n/a
Hatchery Creek Restoration Project	Russell	Lower Cumberland	3	LRN-2010-00444	7/25/2014	23-041-7M(3)	7/15/2014
Blue Spring Creek Stream Restoration Project	Trigg	Lower Cumberland	4	LRN-2013-00776	4/23/2019	2015-092-1R	1/3/2019

Table of Corps Approved Mitigation Projects: KDFWR Mitigation Program - Memphis MVM-2013-95							
PROJECT	COUNTY	SERVICE AREA	Instrument Mod. No.	404 PERMIT ID.NO.	404 PERMIT APPROVAL DATE	401 WQC ID. NO.	401 WQC APPROVAL DATE
Obion II	Hickman	Jackson Purchase	1	MVM-2010-074	4/29/2014	2010-027-1	3/23/2010

Appendix C – Long Term Maintenance Summary 2024

Project Name	Service Area	Date Visited	Easement Violations	Project Stability Issues	Proposed 2025 actions	Notes
Bolts Fork	Big Sandy	10/15/2024	None	None	None	
East Fork Little Sandy 1	Big Sandy	10/1/2024	None	None	None	
East Fork Little Sandy 2	Big Sandy	10/1/2024	Possible mowing within easement	None	Verify project extent through survey, mark boundary	
East Fork Little Sandy 3	Big Sandy	10/1/2024	None	None	None	
East Fork Little Sandy 4	Big Sandy	10/1/2024	None	Small area of bank erosion.	Harvest live stakes locally and plant along eroding bank	
Laurel Gorge Preservation	Big Sandy	10/30/2024	None	None	None	
Left Fork Trace Creek	Big Sandy	10/15/2024	None	Structure instability	None	
Locust Creek	Big Sandy	10/1/2024	Possible mowing within easement	None	Verify project extent through survey, mark boundary	
Middle Creek Battlefield	Big Sandy	N/A	None	Bank erosion	Contract consultants for repair	
Upper Laurel Creek	Big Sandy	10/1/2024	None	None	None	
Haney Fork	Green	8/9/2024	None	None	None	
Obion 1	Jackson Purchase	4/24/2024	None	None	None	
Obion 2	Jackson Purchase	4/24/2024	None	None	None	
Buck Creek Pumphrey Tract	Lower Cumberland	10/29/2024	None	Bank erosion	None	
Cove Spring	Lower Kentucky	10/8/2024	Possible mowing within easement	None	Mark easement boundary, contact park management	
Elm Fork	Lower Kentucky	10/15/2024	None	Bank erosion and riffle instability due to beaver activity	None	
Mill Creek Elementary	Lower Kentucky	10/15/2024	Possible mowing and cutting trees within easement	None	Verify project extent through survey, file easement, contact landowner	
Red Oak	Lower Kentucky	10/15/2024	None	None	None	
Rogers Gap	Lower Kentucky	3/7/2024	None	Bank erosion	Assess entire reach for remedial / AMP	
Claysville LAS	Lower Licking	10/24/2024	None	None	None	Visited by SCC
Kinniconick	Lower Licking	9/24/2024	Encroachment of crops and fill material on easement	Bank erosion in spots, sedimentation, structure instability	Verify project extent through survey, mark boundary	
Myers Station	Lower Licking	10/28/2024	None	Bank erosion	None	
Salt Lick	Lower Licking	8/24/2024	None	None	None	
South Fork Curry's Fork	Salt	10/8/2024	None	None	None	New culvert appears to be functioning
Buck Creek Preservation	Upper Cumberland	10/29/2024	None	None	None	
Crane's Nest	Upper Cumberland	10/29/2024	Possible mowing within easement	None	Verify project extent through survey, mark boundary	
Sinking Valley	Upper Cumberland	10/29/2024	None	None	None	
Terry's Branch	Upper Kentucky	11/7/2024	None	Bank erosion, structure instability, channel avulsion	Assess entire reach for remedial / AMP	
Balls Fork	Upper Kentucky	11/7/2024	Possible mowing within easement	None	Verify project extent through survey, mark boundary	
Bullskin Creek	Upper Kentucky	11/7/2024	None	None	None	
Elisha Creek	Upper Kentucky	11/7/2024	None	None	None	
Guy Cove	Upper Kentucky	8/7/2024	None	None	None	Visited by UK stakeholder
Red Lick	Upper Kentucky	10/29/2024	None	Bank erosion, sedimentation	None	
SECC	Upper Kentucky	11/6/2024	None	None	None	
Slabcamp/Stonecoal	Upper Licking	10/30/2024	None	None	None	

Appendix D – FILO "Phase B" Design, Permitting, and Contracting Status Summary

The following tables are submitted to Louisville USACE and other IRT agencies periodically (every 1-2 months) throughout the year to help communicate and prioritize critical efforts and milestones. This list is limited to projects past the CP/Prospectus stages and before post-construction monitoring.

			Milestone														
Project	KDFWR Service Area	USACE LRL# LRN# MVM#	Section 7 Submittal	Section 7 Concurrence	Section 106 Submittal	Section 106 Concurrence	IRT Design Review Date	JD Site Visit	Design Review and PJD comments received	Draft MP Submittal	Submit Pre-Filing Request	401 Application Date	401 FP Permit Received	401 WQC Permit Received	404 Application Date	404 Permit Received	Begin Construct
Staggs Branch 1	BS	LRL-2016-00153	10/2/2023	7/30/2024	10/22/2021	1/25/2023	5/13/2021 9/16/2022	5/14/2021	6/23/2021 5/18/2023	9/18/2024	9/18/2024	Winter 2025	Spring 2025	Spring 2025	Winter 2025	Spring 2025	Fall 2025
Muddygut Branch	BS	LRL-2022-01025	Summer 2025	Fall 2025	Summer 2025	Fall 2025	Summer 2025	Summer 2025	Summer 2025	Fall 2025	Fall 2025	Winter 2026	Spring 2026	Spring 2026	Winter 2026	Summer 2026	Fall 2026
York	BS	LRL-2013-1012	Fall 2024	Winter 2025	9/25/2024	Fall 2024	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd
Whites Creek	BS	LRL-2012-634	4/25/2016	7/21/2017	3/30/2015	10/22/2015	NA	NA	NA	10/20/2017	NA	6/28/2016	7/8/2016	3/5/2018	7/2/2021	10/18/2021	Winter 2025
Big Rivers Wetland	Grn	LRL-2016-00373	11/14/2022	9/11/2023	2/24/2021	9/28/2022	10/4/2019	1/7/2020	3/31/2020	12/8/2020	12/8/2020	12/8/2023	12/12/2023	1/30/2024	12/8/2023	5/28/20204	Winter 2025
Bender Hollow	Grn	LRL-2018-00982	10/6/2022	8/29/2024	6/16/2021	1/25/2023	11/5/2020	1/6/2020	7/12/2021	11/12/2024	11/12/2024	Spring 2025	Summer 2025	Summer 2025	Spring 2025	Fall 2025	Fall 2025
Gabbard Branch	Grn	LRL-2020-00169	2/27/2024	5/15/2024	7/25/2024 8/20/2024	Fall 2024	9/20/2023	9/25/2023	12/6/2024	Winter 2025	Winter 2025	Spring 2025	Summer 2025	Summer 2025	Spring 2025	Fall 2025	Winter 2026
Ivy Creek	Grn	LRL-2019-00895	2/27/2024	10/29/2024	7/1/2024	Fall 2024	9/20/2023	9/27/2023	12/12/2024	Winter 2025	Winter 2025	Spring 2025	Summer 2025	Summer 2025	Spring 2025	Fall 2025	Winter 2026
Possum Hollow	Grn	LRL-2023-00643	Summer 2025	Fall 2025	Summer 2025	Fall 2025	Winter 2025	Winter 2025	Spring 2025	Spring 2025	Spring 2025	Summer 2025	Fall 2025	Fall 2025	Summer 2025	Winter 2026	Spring 2026
Kaler Bottoms	J-P	LRN-2019-00536	11/16/2023	Winter 2025	8/29/2023	Winter 2025	NA	NA	NA	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd
Blue Spring	LC	LRN-2013-00776	1/15/2015	3/12/2015	11/1/2016	8/13/2015	NA	NA	NA	12/30/2014	NA	1/13/2015	2/10/2015	9/27/2016	11/4/2016	12/2/2019	9/1/2020
Crow Creek	LC	LRN-2020-00539	1/11/2023	6/22/2023	1/18/2023	Winter 2025	8/31/2023	1/29/2024	NA	1/14/2024	Winter 2025	Winter 2025	Winter 2025	Winter 2025	Spring 2025	Summer 2025	Fall 2025
Ferguson Creek	LC	LRN-2018-00128	Winter 2025	Spring 2025	Winter 2025	Spring 2025	NA	NA	NA	Fall 2024	Fall 2024	Winter 2025	Spring 2025	Spring 2025	Spring 2025	Fall 2025	Winter 2026

FILO “Phase B” Design, Permitting, and Contracting Status Summary (continued: page 2 of 3)

			Milestone														
Project	KDFWR Service Area	USACE LRL# LRN# MVM#	Section 7 Submittal	Section 7 Concurrence	Section 106 Submittal	Section 106 Concurrence	IRT Design Review Date	JD Site Visit	Design Review and PJD comments received	Draft MP Submittal	Submit Pre-Filing Request	401 Application Date	401 FP Permit Received	401 WQC Permit Received	404 Application Date	404 Permit Received	Begin Construct
Mud Camp 2	LC	LRN-2020-00540	1/11/2023	11/22/2024	2/3/2023	8/28/2023	8/31/2023	NA	NA	Spring 2025	Spring 2025	Fall 2025	Winter 2026	Winter 2026	Spring 2026	Summer 2026	Fall 2026
Cave Creek Wetland	LKy	LRL-2022-00982	Fall 2025	Winter 2026	Fall 2025	Winter 2026	Summer 2025	Summer 2025	Summer 2025	Fall 2025	Fall 2025	Winter 2026	Spring 2026	Spring 2026	Winter 2026	Summer 2026	Fall 2026
Red Oak A, B, D	LKy	LRL-2018-00770	2/29/2024	5/24/2024	1/4/2021	8/2/2021	3/15/2021	5/27/2021	5/18/2023	11/17/2023	12/5/2023	2/29/2024	3/2/2024	6/6/2024	2/29/2024	10/2/2024	Winter 2025
Pond Creek	LKy	LRL-2014-191	Winter 2025	Spring 2025	7/20/2015	10/29/2017	2/6/2024	2/7/2024	Winter 2025	Winter 2025	Winter 2025	Spring 2025	Summer 2025	Summer 2025	Spring 2025	Fall 2025	Fall 2025
Minors Creek 2	LKy	LRL-2019-01049	Winter 2025	Spring 2025	Spring 2025	Summer 2025	4/23/2024	4/23/2024	Fall 2024	Spring 2025	Spring 2025	Fall 2025	Winter 2026	Winter 2026	Fall 2025	Spring 2026	Summer 2026
Rock Lick Cr (& Drip Spr)	LL	LRL-2016-00393	3/29/2023	Spring 2025	NA	NA	12/7/2021	12/8/2021	3/14/2022	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd
Meadowland FD	NKy	LRL-2020-00184	4/5/2022	12/5/2022	4/10/2020	4/29/2021	2/2/2021	2/5/2021 3/3/2022	3/26/2021 6/30/2022	10/29/2021	10/29/2021	2/28/2024	NA	8/13/2023	2/28/2024	11/27/2024	Winter 2025
Middle Creek 1	NKy	LRL-2019-161	7/8/2024	10/28/2024	7/19/2023	8/21/2024	3/21/2022	3/28/2022	5/18/2023	2/29/2024	2/29/2024	9/27/2024	10/18/2024	Winter 2025	9/27/2024	Spring 2025	Fall 2025
Middle Creek 2	NKy	LRL-2019-01052	7/8/2024	10/28/2024	8/9/2023	8/21/2024	3/21/2022	3/28/2022	5/18/2023	2/29/2024	2/29/2024	9/27/2024	10/18/2024	Winter 2025	9/27/2024	Spring 2025	Fall 2025
Middle Creek 3	NKy	LRL-2019-00590	7/8/2024	10/28/2024	NA	NA	3/21/2022	3/28/2022	5/18/2023	2/29/2024	2/29/2024	9/27/2024	10/18/2024	Winter 2025	9/27/2024	Spring 2025	Fall 2025
Steep Creek	NKy	LRL-2020-00187	7/8/2024	10/28/2024	8/9/2023	8/21/2024	9/23/2022	10/3/2022	5/18/2023	7/3/2024	7/8/2024	10/15/2024	10/16/2024	12/18/2024	10/15/2024	Spring 2025	Fall 2025
St. Anne	NKy	LRL-2020-00186	Winter 2025	Spring 2025	Winter 2025	Spring 2025	Winter 2025	Winter 2025	Winter 2025	Winter 2025	Winter 2025	Summer 2025	Fall 2025	Fall 2025	Summer 2025	Winter 2026	Spring 2026
Trib to Twelvemile	NKy	LRL-2021-00105	Summer 2025	Fall 2025	Summer 2025	Fall 2025	Spring 2025	Spring 2025	Spring 2025	Summer 2025	Summer 2025	Fall 2025	Winter 2026	Winter 2026	Fall 2025	Spring 2026	Fall 2026
Big Lick Hollow FD	Salt	LRL-2018-00383	1/22/2021	9/27/2022	NA	NA	2/6/2020	2/6/2020	4/27/2020	7/2/2020	8/15/2022	8/25/2020 9/15/2022	8/27/2021	10/27/2022	10/28/2022	8/8/2023	12/11/2023
Harrison Fork MOA	Salt	LRL-2012-274	3/1/2017	3/17/2017	1/11/2010	3/12/2010 2/1/2022	NA	NA	NA	5/27/2017	NA	11/10/2016	11/29/2017	6/27/2019	2/3/2022	10/17/2023	8/26/2024
Stillwell Branch	Salt	LRL-2017-00906	2/27/2024	4/26/2024	12/8/2020	10/10/2021	2/4/2020	12/1/2020	3/31/2020	7/15/2021	7/15/2021	2/15/2024	2/18/2024	6/4/2024	2/15/2024	9/19/2024	Winter 2025
Rolling Fork FP	Salt	LRL-2020-00630	5/24/2022	7/12/2023	5/18/2021	1/25/2023	1/11/2022	2/28/2022	5/16/2023	11/27/2023	12/5/2023	5/14/2024	5/16/2024	6/25/2024	5/14/2024	10/22/2024	Winter 2025

FILO “Phase B” Design, Permitting, and Contracting Status Summary (continued: page 3 of 3)

			Milestone														
Project	KDFWR Service Area	USACE LRL# LRN# MVM#	Section 7 Submittal	Section 7 Concurrence	Section 106 Submittal	Section 106 Concurrence	IRT Design Review Date	JD Site Visit	Design Review and PJD comments received	Draft MP Submittal	Submit Pre-Filing Request	401 Application Date	401 FP Permit Received	401 WQC Permit Received	404 Application Date	404 Permit Received	Begin Construct
Wolf Run	Salt	LRL-2014-60	9/5/2024	12/3/2024	9/7/2023 1/24/2024	2/10/2025 6/27/2024	6/16/2023	6/20/2023	6/27/2023	9/17/2024	9/18/2024	Fall 2024	Spring 2025	Spring 2025	Fall 2024	Spring 2025	Fall 2025
Dodge Gap	Salt	LRL-2018-00112	6/17/2024	12/3/2024	5/15/2023	8/21/2024	2/6/2024	2/13/2024	Fall 2024	9/17/2024	9/18/2024	Fall 2024	Spring 2025	Spring 2025	Fall 2024	Spring 2025	Fall 2025
Rolling Fork River	Salt	LRL-2020-00631	3/1/2023	Spring 2025	5/18/2021	1/25/2023	1/11/2022	2/28/2022	5/16/2023	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd
Otter Creek	Salt	LRL-2013-425	7/3/2019	9/20/2019	NA	NA	NA	NA	NA	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd
Mill Creek	Salt	LRL-2020-00188	Spring 2025	Summer 2025	Spring 2025	Summer 2025	Spring 2025	Spring 2025	Spring 2025	Spring 2025	Spring 2025	Summer 2025	Fall 2025	Fall 2025	Summer 2025	Winter 2026	Fall 2026
Broke Leg	UL	LRL-2016-00371	1/26/2024	4/26/2024	1/22/2021	8/22/2022	10/4/2019	11/24/2020	3/31/2020	4/29/2021	4/29/2021	2/1/2024	2/12/2024	3/21/2024	1/26/2024	8/20/2024	Winter 2025
MEOW	UL	LRL-2018-00682	7/8/2024	Fall 2024	5/13/2024	10/17/2024	3/30/2022	3/30/2022	5/18/2023	Winter 2025	Winter 2025	Spring 2025	Summer 2025	Summer 2025	Winter 2025	Summer 2025	Fall 2025
Horse Mill	UL	LRL-2018-00100	7/8/2024	Fall 2024	11/18/2021	4/19/2022	9/13/2021	10/4/2021	6/8/2022	Winter 2025	Winter 2025	Spring 2025	Summer 2025	Summer 2025	Spring 2025	Fall 2025	Winter 2026
Slabcamp Branch	UL	LRL-2018-00562	tbd	tbd	6/20/2022	7/13/2022	11/2/2021	11/3/2021	6/8/2022	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd
Marsh Creek FD	UC	LRN-2022-00766	11/30/2023	Fall 2024	9/7/2023	11/3/2023	NA	NA	NA	8/1/2024	10/2/2024	Winter 2025	Spring 2025	Spring 2025	Winter 2025	Spring 2025	Fall 2025
Burnett Branch	UC	LRN-2013-00116	Winter 2025	Spring 2025	3/19/2018	6/5/2020	NA	NA	NA	9/6/2018	Winter 2025	Spring 2025	Summer2025	Summer 2025	Spring 2025	Fall 2025	Winter 2026
Ross Creek 6	UKy	LRL-2020-00326	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd
Little Sextons Creek	UKy	LRL-2018-00981	2/28/2024	2/10/2025	NA	NA	10/28/2021	9/28/2021	12/29/2021	Winter 2025	Winter 2025	Spring 2025	Summer 2025	Summer 2025	Spring 2025	Fall 2025	Winter 2026
Ross Creek 3	UKy	LRL-2017-00042	Fall 2024	Winter 2025	9/25/2024	Fall 2024	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd	tbd

Appendix E – Credit Release Status Summary, All Areas, All Credit Types

This appendix consists of two tables, one for streams and one for wetlands, intended to provide information similar in format to a recent programmatic, procedural audit, provided here for reference. The previous (2023) annual report utilized a different table with a similar title. However, this information is consistent with the "Credit Book" that we submit monthly, so simpler to just produce this here for reference. Appendix D, F, and G provide additional insight for procedural progress.

Stream Credits

Service Area	Advcance Credit Allocation	Credits sold since 2012	Released Credits	Available Credits	Credit Liability
Big Sandy	240,000.00	38,104.34	11,739.00	213,634.66	26,365.34
Upper Cumberland River	240,000.00	18,723.21	3,502.60	224,779.39	15,220.61
Lower Cumberland River	240,000.00	66,995.41	-	173,004.59	66,995.41
Green River	240,000.00	135,050.06	2,998.00	107,947.94	132,052.06
Jackson Purchase	240,000.00	12,207.09	-	227,792.91	12,207.09
Upper Kentucky River	240,000.00	35,127.63	455.00	205,327.37	34,672.63
Lower Kentucky River	240,000.00	37,804.40	23,925.00	226,120.60	13,879.40
Upper Licking River	240,000.00	14,153.60	-	225,846.40	14,153.60
Lower Licking River	240,000.00	50,646.07	17,507.00	206,860.93	33,139.07
Northern Kentucky	300,000.00	107,539.00	-	192,461.00	107,539.00
Salt River	240,000.00	148,244.04	19,709.00	111,464.96	128,535.04

Wetland Credits

Service Area	Advcance Credit Allocation	Credits sold since 2012	Released Credits	Withdrawn Credits	Available Credits	Credit Liability
Big Sandy	100.000	6.561	0.150		93.589	6.411
Upper Cumberland River	100.000	19.841	-	80.159		19.841
Lower Cumberland River	100.000	24.443	0.435	75.992		24.008
Green River	200.000	106.388	9.970	-	103.582	96.418
Jackson Purchase	200.000	12.020	-	-	187.980	12.020
Upper Kentucky River	100.000	35.460	-	-	64.540	35.460
Lower Kentucky River	100.000	17.532	-	-	82.468	17.532
Upper Licking River	100.000	20.620	-	-	79.380	20.620
Lower Licking River	100.000	6.480	-	-	93.520	6.480
Northern Kentucky	100.000	48.300	-	-	51.700	48.300
Salt River	200.000	127.963	-	-	72.037	127.963

Appendix F – Audit Table

This appendix consists of two tables, one for streams and one for wetlands, intended to provide information similar in format to a recent programmatic, procedural audit, provided here for reference. Both tables are a list of ongoing projects, including those in monitoring phases. These tables are very similar to those shown in appendix D, but with columns for project credit value and concept plan stages instead of columns for ESA and NHPA compliance.

Stream

Mitigation Project Name	Service Area	USACE LRL#/LRN#/MVM#	Total Projected Credits	Concept Plan (CP) Submittal Date	CP Comments Date	Response to CP Comments	CP Approval Date***	Mitigation Plan Submital Date	MP Comments Date	MP Repsonse to Comments Date	MP Approval Date	Project Constuction Date
Ed Mabry 2*	Big Sandy	LRL-2013-598 LRL-2013-1013 LRL-2012-478	9315	7/10/2013	9/30/2013	10/25/2013		5/18/2020	NA	6/26/2020	6/14/2021	7/14/2021
Muddygut Branch	Big Sandy	LRL-2022-01025	5702	12/1/2022	9/27/2023	11/30/2023		Winter 2026	Spring 2026	Spring 2026	Fall 2026	Winter 2027
Old Trace*	Big Sandy	LRL-2013-336	9141	4/1/2013	7/1/2013	8/8/2013		NA	NA	3/8/2016	2/13/2017	6/6/2017
Staggs Branch 1	Big Sandy	LRL-2016-00153	11763	2/16/2016	4/29/2016	7/21/2016		9/18/2024	Winter 2025	Winter 2025	Fall 2025	Fall 2025
York	Big Sandy	LRL-2013-1012	261	4/3/2014	11/17/2014	12/11/2014		Fall 2025	Winter 2026	Winter 2026	Summer	Fall 2026
AG1	Big Sandy	LRL-2023-00475	9589	10/1/2023	4/2/2024	NA		tbd	tbd	tbd	tbd	tbd
Whites Creek	Big Sandy	LRL-2012-634	3955	9/6/2012	10/2/2012	NA		9/18/2018	NA	7/2/2021	10/18/2021	Winter 2025
Bender Hollow	Green	LRL-2018-00982	21362	11/15/2018	4/17/2019	11/22/2019		11/12/2024	Winter 2025	Spring 2025	Fall 2025	Fall 2025
Big Rivers Wetland	Green	LRL-2016-00373	3418	5/8/2017	8/4/2017	9/22/2017		12/8/2020	6/24/2023	12/8/2023	5/28/20204	Winter 2025
Eagle Creek Tribs	Green	LRL-2012-716	1848	2/1/2010	NA	NA		11/21/2012	1/31/2013	6/18/2013	1/23/2015	6/30/2015
Gabbard Branch	Green	LRL-2020-00169	48881	3/1/2020	10/13/2020	12/7/2020		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Goose Creek 1	Green	LRL-2012-646	17097	8/1/2012	10/23/2012	1/31/2013		3/16/2016	NA	4/26/2016	3/22/2017	11/2/2017
Ivy Creek	Green	LRL-2019-00895	37905	10/1/2019	1/15/2020	3/4/2020		Spring 2025	Summer	Fall 2025	Winter 2026	Winter 2026
Possum Hollow	Green	LRL-2023-00643	1749	8/10/2023	12/15/2023	1/10/2024		Spring 2025	Summer	Summer	Winter 2026	Spring 2026
Cope Creek	Jackson Purchase	LRN-2024-00849	3679	10/31/2024	12/27/0224	tbd		Spring 2026	Summer	Summer	Winter 2027	Winter 2027
Kaler Bottoms	Jackson Purchase	LRN-2019-00536	514	8/1/2019	3/9/2020	5/19/2020		tbd	tbd	tbd	tbd	tbd
Obion Creek 2*	Jackson Purchase	MVM-2013-095	9000	3/1/2008	4/16/2008	NA		12/28/2009	NA	2/11/2010	2/16/2010	3/1/2010
Blue Spring	Lower	LRN-2013-00776	32808	7/2/2013	12/13/2013	1/10/2014		12/30/2014	5/9/2016	11/4/2016	12/2/2019	9/1/2020
Crow Creek	Lower	LRN-2020-00539	50913	5/28/2020	8/4/2020	8/10/2020		11/14/2024	2/6/2025	Winter 2025	Winter 2026	Fall 2027
Ferguson Creek	Lower	LRN-2018-00128	27690	1/12/2022	3/18/2022	5/12/2022		Summer	Fall 2025	Fall 2025	Spring 2026	Fall 2026
Mud Camp 2	Lower	LRN-2020-00540	30153	5/22/2020	7/27/2020	8/10/2020		Fall 2026	Winter 2027	Winter 2027	Summer	Fall 2027
Minors Creek 1	Lower Kentucky	LRL-2013-91.pgj	22068	1/1/2013	4/22/2013	4/26/2013		7/29/2016	NA	12/6/2016	5/22/2017	11/27/2017
Minors Creek 2	Lower Kentucky	LRL-2019-01049	2021	12/20/2019	3/24/2020	4/20/2020		Spring 2025	Summer	Fall 2025	Spring 2026	Summer 2026
Pond Creek	Lower Kentucky	LRL-2014-191	373	4/11/2014	9/3/2014	11/26/2014		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Red Oak A, B, D	Lower Kentucky	LRL-2018-00770	19943	7/31/2014	11/20/2014	12/9/2014		11/17/2023	2/27/2024	2/29/2024	10/2/2024	Winter 2025

Stream												
Mitigation Project Name	Service Area	USACE LRL#/LRN#/MVM#	Total Projected Credits	Concept Plan (CP) Submittal Date	CP Comments Date	Response to CP Comments	CP Approval Date***	Mitigation Plan Submital Date	MP Comments Date	MP Repsonse to Comments Date	MP Approval Date	Project Constuction Date
Red Oak C	Lower Kentucky	LRL-2014-500	6906	7/31/2014	11/17/2014	12/9/2014		11/3/2016	NA	12/22/2017	4/27/2018	8/10/2018
Big Farm*	Lower Licking	LRL-2014-209	40870	4/11/2014	7/31/2014	8/6/2014		8/23/2016	3/7/2017	1/9/2019	5/30/2019	8/22/2019
Myers Station	Lower Licking	LRL-2012-637	14442	10/1/2012	1/10/2013	1/17/2013		8/14/2014	3/3/2015	12/21/2015	4/20/2016	8/8/2016
Rock Lick Creek (and Drip Springs)	Lower Licking	LRL-2016-00393	52135	12/8/2016	4/4/2017	6/16/2017		tbd	tbd	tbd	tbd	tbd
Big Bone Lick Lake	Northern Kentucky	LRL-2022-00987	10167	9/7/2023	9/24/2024	tbd		Fall 2025	Winter 2026	Winter 2026	Summer	Fall 2026
Gunpowder 1	Northern Kentucky	LRL-2020-847	6969	12/2/2020	6/7/2021	8/10/2021		tbd	tbd	tbd	tbd	tbd
Meadowland FD	Northern Kentucky	LRL-2020-00184	25035	3/18/2020	6/16/2020	8/1/2020		10/29/2021	11/27/2023	2/28/2024	11/27/2024	Winter 2025
Middle Creek 1	Northern Kentucky	LRL-2019-161	16742	6/7/2019	10/28/2019	12/4/2019		2/29/2024	4/25/2024	5/20/2024	Spring 2025	Fall 2025
Middle Creek 2	Northern Kentucky	LRL-2019-01052	23575	4/14/2020	10/20/2020	10/22/2020		2/29/2024	4/25/2024	5/20/2024	Spring 2025	Fall 2025
Middle Creek 3	Northern Kentucky	LRL-2019-00590	7365	8/16/2019	12/6/2019	2/5/2020		2/29/2024	4/25/2024	5/20/2024	Spring 2025	Fall 2025
Steep Creek	Northern Kentucky	LRL-2020-00187	21332	4/14/2020	10/13/2020	10/22/2020		7/3/2024	8/22/2024	10/15/2024	Spring 2025	Fall 2025
Trib to Twelvemile	Northern Kentucky	LRL-2021-00105	7993	3/19/2021	11/23/2021	1/20/2022		Summer	Fall 2025	Fall 2025	Spring 2026	Fall 2026
Big Lick Hollow FD	Salt	LRL-2018-00383	23157	4/30/2018	6/26/2018	10/26/2018		7/2/2020	2/9/2022	10/28/2022	8/8/2023	12/11/2023
Dodge Gap	Salt	LRL-2018-00112	11665	1/31/2018	5/4/2018	6/4/2018		9/17/2024	12/17/2024	Winter 2025	Fall 2025	Fall 2025
Otter Creek	Salt	LRL-2013-425	17313	5/17/2013	8/30/2019	12/23/2013		tbd	tbd	tbd	tbd	tbd
Rolling Fork FP	Salt	LRL-2020-00630	3606	7/28/2020	10/23/2020	12/9/2020		11/27/2023	3/13/2024	5/14/2024	10/22/2024	Winter 2025
Rolling Fork River	Salt	LRL-2020-00631	21900	8/29/2020	10/23/2020	12/9/2020		tbd	tbd	tbd	tbd	tbd
Stillwell Branch	Salt	LRL-2017-00906	74560	1/3/2018	5/8/2018	7/11/2018		7/15/2021	1/11/2024	2/15/2024	9/19/2024	Winter 2025
Wolf Run	Salt	LRL-2014-60.pgj	23552	2/6/2014	4/29/2014	5/30/2014		9/17/2024	12/17/2024	Winter 2025	Fall 2025	Fall 2025
Mill Creek 1	Salt	LRL-2020-00188	22274	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	Winter 2026
Mill Creek 2	Salt	LRL-2020-00188	21094	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	Winter 2026
Mill Creek 3	Salt	LRL-2020-00188	16112	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	tbd
Mill Creek 4	Salt	LRL-2020-00188	12071	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	tbd
Mill Creek 5	Salt	LRL-2020-00188	24950	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	tbd
Broke Leg Phase 1	Upper Licking	LRL-2016-00371	11876	5/16/2016	10/31/2016	11/4/2016		4/29/2021	3/22/2022	1/26/2024	8/20/2024	Winter 2025
Horse Mill North	Upper Licking	LRL-2018-00100	3465	1/23/2018	4/17/2018	5/3/2018		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Horse Mill South	Upper Licking	LRL-2018-00100	5501	1/23/2018	4/17/2018	5/3/2018		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Slabcamp Branch ABFGH	Upper Licking	LRL-2018-00562	20616	7/11/2018	1/29/2019	7/22/2019		tbd	tbd	tbd	tbd	tbd
Slabcamp Branch CDE	Upper Licking	LRL-2018-00562	9500	7/11/2018	1/29/2019	7/22/2019		tbd	tbd	tbd	tbd	tbd
Burnett Branch	Upper	LRN-2013-00116	13591	3/7/2013	7/26/2013	NA		9/6/2018	NA	7/7/2020	Fall 2025	Winter 2026
Marsh Creek FD	Upper	LRN-2022-00766	1034	11/7/2022	2/10/2023	**		8/1/2024	12/19/2024	Winter 2025	Spring 2025	Fall 2025
Sinking Valley	Upper	LRN-2012-00326	3730	3/13/2012	5/16/2012	5/16/2012		5/24/2013	NA	11/14/2013	1/2/2014	NA
Ross Creek 6	Upper Kentucky	LRL-2020-00326	3032	8/1/2020	7/14/2021	9/29/2021		tbd	tbd	tbd	tbd	tbd
Little Sextons Creek	Upper Kentucky	LRL-2018-00981	31790	11/6/2018	4/18/2019	12/20/2019		Spring 2025	Summer	Summer	Winter 2026	Winter 2026
Ross Creek 1 & 2	Upper Kentucky	LRL-2013-143	1494	3/20/2013	6/5/2013	NA		7/7/2016	3/7/2017	6/26/2017	10/26/2017	2/21/2019
Ross Creek 3	Upper Kentucky	LRL-2017-00042	1791	1/17/2017	4/28/2017	5/22/2017		Fall 2025	Winter 2026	Winter 2026	Summer 2026	Winter 2027

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Wetland												
Mitigation Project Name	Service Area	USACE LRL#/LRN#/MVM#	Total Projected Credits	Concept Plan (CP) Submittal Date	CP Comments Date	Response to CP Comments	CP Approval Date***	Mitigation Plan Submital Date	MP Comments Date	MP Repsonse to Comments Date	MP Approval Date	Project Constuction Date
Ed Mabry 2*	Big Sandy	LRL-2013-598 LRL-2013-1013 LRL-2012-478	0.05	7/10/2013	9/30/2013	10/25/2013		5/18/2020	NA	6/26/2020	6/14/2021	7/14/2021
Staggs Branch 1	Big Sandy	LRL-2016-00153	7.80	2/16/2016	4/29/2016	7/21/2016		9/18/2024	Winter 2025	Winter 2025	Fall 2025	Fall 2025
AG1	Big Sandy	LRL-2023-00475	25.00	10/1/2023	4/2/2024	NA		tbd	tbd	tbd	tbd	tbd
Whites Creek	Big Sandy	LRL-2012-634	0.11	9/6/2012	10/2/2012	NA		9/18/2018	NA	7/2/2021	10/18/2021	Winter 2025
Eagle Creek Tribs	Green	LRL-2012-716	10.28	2/1/2010	NA	NA		11/21/2012	1/31/2013	6/18/2013	1/23/2015	6/30/2015
Big Rivers Wetland	Green	LRL-2016-00373	38.80	5/8/2017	8/4/2017	9/22/2017		12/8/2020	6/24/2023	12/8/2023	5/28/20204	Winter 2025
Gabbard Branch	Green	LRL-2020-00169	18.53	3/1/2020	10/13/2020	12/7/2020		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Ivy Creek	Green	LRL-2019-00895	18.30	10/1/2019	1/15/2020	3/4/2020		Spring 2025	Summer	Fall 2025	Winter 2026	Winter 2026
Possum Hollow	Green	LRL-2023-00643	92.77	8/10/2023	12/15/2023	1/10/2024		Spring 2025	Summer	Summer	Winter 2026	Spring 2026
Obion Creek 2*	Jackson Purchase	MVM-2013-095	12.00	3/1/2008	4/16/2008	NA		12/28/2009	NA	2/11/2010	2/16/2010	3/1/2010
Kaler Bottoms	Jackson Purchase	LRN-2019-00536	7.20	8/1/2019	3/9/2020	5/19/2020		tbd	tbd	tbd	tbd	tbd
Cope Creek	Jackson Purchase	LRN-2024-00849	25.00	10/28/2024	12/27/0224	tbd		Spring 2026	Summer	Summer	Winter 2027	Winter 2027
Hatchery Creek*	Lower	LRN-2010-00444	0.85	3/17/2010	NA	3/25/2012		NA	NA	10/16/2012	7/25/2014	8/8/2014
Ferguson Creek	Lower	LRN-2018-00128	39.19	1/12/2022	3/18/2022	5/12/2022		Summer	Fall 2025	Fall 2025	Spring 2026	Fall 2026
Cave Creek Wetland	Lower Kentucky	LRL-2022-00982	15.85	8/10/2023	9/29/2023	10/31/2023		Fall 2025	Winter 2026	Winter 2026	Summer	Fall 2026
Browns Bottom	Lower Kentucky	LRL-2022-00711	2.20	9/9/2022	7/20/2023	8/29/2023		Fall 2025	Winter 2026	Winter 2026	Summer	Fall 2026
Red Oak A, B, D	Lower Kentucky	LRL-2018-00770	2.40	7/31/2014	11/20/2014	12/9/2014		11/17/2023	2/27/2024	2/29/2024	10/2/2024	Winter 2025
Pond Creek	Lower Kentucky	LRL-2014-191	12.34	4/11/2014	9/3/2014	11/26/2014		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Big Farm*	Lower Licking	LRL-2014-209	24.30	4/11/2014	7/31/2014	8/6/2014		8/23/2016	3/7/2017	1/9/2019	5/30/2019	8/22/2019
Rock Lick Creek (and Drip Springs)	Lower Licking	LRL-2016-00393	43.00	4/11/2014	4/4/2017	6/16/2017		tbd	tbd	tbd	tbd	tbd

Wetland

Mitigation Project Name	Service Area	USACE LRL#/LRN#/MVM#	Total Projected Credits	Concept Plan (CP) Submittal Date	CP Comments Date	Response to CP Comments	CP Approval Date***	Mitigation Plan Submital Date	MP Comments Date	MP Repsonse to Comments Date	MP Approval Date	Project Constuction Date
Big Bone Lick Lake	Northern Kentucky	LRL-2022-00987	7.03	9/7/2023	9/24/2024	12/5/2024		Fall 2025	Winter 2026	Winter 2026	Summer 2026	Fall 2026
Middle Creek 1	Northern Kentucky	LRL-2019-161	1.79	3/18/2020	6/16/2020	8/1/2020		2/29/2024	4/25/2024	5/20/2024	Spring 2025	Fall 2025
Middle Creek 2	Northern Kentucky	LRL-2019-01052	10.87	6/7/2019	10/28/2019	12/4/2019		2/29/2024	4/25/2024	5/20/2024	Spring 2025	Fall 2025
St. Anne	Northern Kentucky	LRL-2020-00186	8.75	11/6/2020	6/9/2021	3/8/2022		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Rolling Fork FP	Salt	LRL-2020-00630	68.30	7/28/2020	10/23/2020	12/9/2020		11/27/2023	3/13/2024	5/14/2024	10/22/2024	Winter 2025
Wolf Run	Salt	LRL-2014-60	6.70	2/6/2014	4/29/2014	5/30/2014		9/17/2024	12/17/2024	Winter 2025	Fall 2025	Fall 2025
Otter Creek	Salt	LRL-2013-425	4.24	5/17/2013	8/30/2019	12/23/2013		tbd	tbd	tbd	tbd	tbd
Mill Creek 1	Salt	LRL-2020-00188	35.80	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	Winter 2026
Mill Creek 2	Salt	LRL-2020-00188	50.80	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	Winter 2026
Mill Creek 3	Salt	LRL-2020-00188	52.60	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	tbd
Mill Creek 5	Salt	LRL-2020-00188	5.10	3/1/2020	12/8/2020	12/29/2020		Spring 2025	Summer	Summer	Fall 2025	tbd
MEOW	Upper Licking	LRL-2018-00682	38.62	9/11/2018	1/7/2019	1/29/2019		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Horse Mill North	Upper Licking	LRL-2018-00100	0.81	1/23/2018	4/17/2018	5/3/2018		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Horse Mill South	Upper Licking	LRL-2018-00100	4.04	1/23/2018	4/17/2018	5/3/2018		Winter 2025	Spring 2025	Spring 2025	Fall 2025	Fall 2025
Marsh Creek FD	Upper	LRN-2022-00766	27.10	11/7/2022	2/10/2023	**		8/1/2024	12/19/2024	Winter 2025	Spring 2025	Fall 2025
Ross Creek 1 & 2	Upper Kentucky	LRL-2013-143	5.20	3/20/2013	6/5/2013	NA		NA	3/7/2017	6/26/2017	10/26/2017	2/21/2019
Little Sextons Creek	Upper Kentucky	LRL-2018-00981	4.00	11/6/2018	4/18/2019	12/20/2019		Spring 2025	2025	Summer 2025	Winter 2026	Winter 2026

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Appendix G – Service Area Credit Status, by Project, Year and Order of Implementation

Appendix G consists of many tables that list per service area, a comprehensive set of data that includes annual cumulative credit sales since 2012 (including transition), by year, cross referenced with the mitigation projects that account for those credits in order of intended implementation. Projects are color coded according to procedural milestones, such as IPBI. It also includes histograms generated from the data set to show a side-by-side comparison of the credit volume of projects compared to credit sales, and whether IPBI activities have been performed. The histograms are generated for the previous year (2023), the current reporting year (2024) and projected for the next year (2025). Summaries of histograms for 2024 all service areas for stream and wetland credits comprise the end of this appendix.

Information for each Service area is broken into three pages. The FILO program maintains these as one large table per service area, but are severed here for printing and legibility. To assist with legibility, each of the three pages includes the same list (leftmost three columns) of years, annual credit sales and the cumulative credit value of projects listed next to that, fulfilling the oldest credit sales first. In all cases, stream credit information is grouped at the top of the page, wetland credit information at the bottom.

The first page shows all projects, by column, left-to right, with the left most project column being the most complete, applying to the oldest credit sales, and proceeding forward in time as you progress to the right across the page. Stream-Wetland 'combo' projects are kept in the same column and prioritized in time in accordance with the greatest need such that wetland projects are not delayed by older stream projects that may not have wetland components. Organizing in this fashion results in blank portions of columns, most often in the wetland region of the tables, but this does not delay focus or effort. Within project columns, credits are listed in the same rows as the credit sales to which they are correlated. In some cases portions of, or entire project credit values may be listed in the row labeled "future", which means those projects exceed credit sales to date.

The second page in each service area is structured similarly as the first, top to bottom and left to right. However, instead of listing each project, the columns represent major compliance milestones and each are associated with the cumulative total project credits (all projects combined) that have met those milestones. These are grouped by previous year (2023), current reporting year (2024) and projected for next year (2025).

The third page in each service area table consists of a histogram (as mentioned in the introductory paragraph above) that is derived from the data shown in page 2 of each service area. The histograms are just a convenient way to view the data as a comparison of total credits sold to project potential, as well as over a few years, rather than just using the numbers.

These service area tables are our primary (daily) way to track project credit values compared to credit sales to help support and inform project prioritization as well as the Phase A (new project development) priority search areas.

Appendix G (continued), Big Sandy Service Area Page 1: Credit sales and projects by year.

Big Sandy River Service Area

Stream			Old Trace Creek	Old Trace Creek WSP	Mabry 2 (Greene and Johnson)	Mabry 2 (Greene and Johnson) WSP	Mabry 2 (Mart White)	Mabry 2 (Mart White) WSP	Mabry 2 (Smith)	Mabry 2 (Smith) WSP	Whites Creek	Stagg Branch 1	York Track	Muddygut Branch	A.G 1
Year	Credits Sold	All Projects (credits)	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal	Credit Bal
Transition	23,109.00	23,807.00	8,451.57	690.00	2,967.00	291.00	3,871.00	296.00	1,765.00	125.00	1,955.00	395.43	-	-	-
2012	2,376.28	2,376.28	-	-	-	-	-	-	-	-	-	2,376.28	-	-	-
2013	5,707.60	5,707.60	-	-	-	-	-	-	-	-	-	5,707.60	-	-	-
2014	3,535.58	3,535.58	-	-	-	-	-	-	-	-	-	3,283.69	251.89	-	-
2015	2,599.45	2,599.45	-	-	-	-	-	-	-	-	-	-	9.11	2,590.34	-
2016	176.60	176.60	-	-	-	-	-	-	-	-	-	-	-	176.60	-
2017	138.83	138.83	-	-	-	-	-	-	-	-	-	-	-	138.83	-
2017	25.00	25.00	-	-	-	-	-	-	-	-	-	-	-	25.00	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	421.00	421.00	-	-	-	-	-	-	-	-	-	-	-	421.00	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	21.00	21.00	-	-	-	-	-	-	-	-	-	-	-	21.00	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		11,818.33	-	-	-	-	-	-	-	-	-	-	-	3,738.33	8,080.00
Total	38,304.34	48,728.57	8,451.57	690.00	2,967.00	291.00	3,871.00	296.00	1,765.00	125.00	1,955.00	11,763.00	260.00	5,760.84	8,080.00

Wetland			Mabry 2 (Smith)	Whites Creek	Stagg Branch 1	A.G 1
Year	Credits Sold	All Projects (credits)	Credit Bal	Credit Bal	Credit Bal	Credit Bal
Transition	3.550	3.550	0.050	0.110	3.390	-
2012	2.410	2.410	-	-	2.410	-
2013	0.024	0.024	-	-	0.024	-
2014	0.577	0.577	-	-	0.577	-
2015	-	-	-	-	-	-
2016	-	-	-	-	-	-
2017	-	-	-	-	-	-
2017	-	-	-	-	-	-
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	-	-	-	-	-	-
2020	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	-	-	-	-	-	-
2023	-	-	-	-	-	-
2024	-	-	-	-	-	-
Future		10.500	-	-	3.500	35.000
Total	6.561	22.061	0.050	0.110	7.900	35.000

Appendix G (continued), Big Sandy Service Area Page 2: Cumulative credits by procedural milestone.

Big Sandy River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects (credits)	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	23,103.00	22,807.00	18,456.57	18,852.00	22,807.00	22,807.00	22,411.57	22,411.57	22,807.00	22,807.00	22,807.00	22,807.00	22,807.00	22,807.00
2012	2,376.28	2,376.28	-	2,376.28	2,376.28	2,376.28	-	-	2,376.28	2,376.28	2,376.28	2,376.28	2,376.28	2,376.28
2013	5,707.60	5,707.60	-	5,707.60	5,707.60	5,707.60	-	-	5,707.60	5,707.60	5,707.60	5,707.60	5,707.60	5,707.60
2014	3,535.58	3,535.58	-	3,535.58	3,535.58	3,535.58	-	-	3,535.58	3,535.58	3,283.69	3,283.69	3,535.58	3,535.58
2015	2,599.45	2,599.45	-	9.11	9.11	2,599.45	-	-	9.11	2,599.45	-	-	2,599.45	2,599.45
2016	176.60	176.60	-	-	-	176.60	-	-	-	176.60	-	-	176.60	176.60
2017	138.83	138.83	-	-	-	138.83	-	-	-	138.83	-	-	138.83	138.83
2017	25.00	25.00	-	-	-	25.00	-	-	-	25.00	-	-	25.00	25.00
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	421.00	421.00	-	-	-	421.00	-	-	-	421.00	-	-	421.00	421.00
2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	21.00	21.00	-	-	-	21.00	-	-	-	21.00	-	-	21.00	21.00
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		11,918.23	-	-	-	2,329.23	-	-	-	11,918.23	-	-	11,918.23	11,918.23
Total	38,104.34	49,726.57	18,456.57	30,480.57	34,435.57	40,137.57	22,411.57	22,411.57	34,435.57	49,726.57	34,174.57	34,174.57	49,726.57	49,726.57

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects (credits)	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	3.550	3.550	0.05	3.44	3.55	3.55	0.16	0.16	3.55	3.55	3.55	3.55	3.55	3.55
2012	2.410	2.410	-	2.41	2.41	2.41	-	-	2.41	2.41	2.41	2.41	2.41	2.41
2013	0.024	0.024	-	0.02	0.02	0.02	-	-	0.02	0.02	0.02	0.02	0.02	0.02
2014	0.577	0.577	-	0.58	0.58	0.58	-	-	0.58	0.58	0.58	0.58	0.58	0.58
2015	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		26.399	-	1.40	1.40	1.40	-	-	1.40	26.40	1.40	1.40	26.40	26.40
Total	6.561	32.960	0.05	7.85	7.96	7.96	0.16	0.16	7.96	32.96	7.96	7.96	32.96	32.96

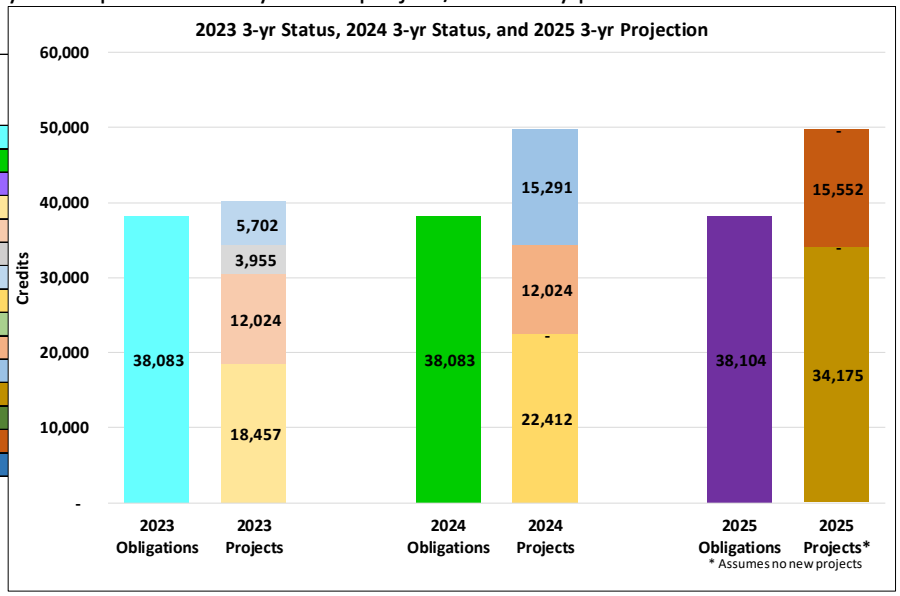
Appendix G (continued), Big Sandy Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Big Sandy River Service Area

Stream

Year	Credits Sold	All Projects (credits)
Transition	23,103.00	22,807.00
2012	2,376.28	2,376.28
2013	5,707.60	5,707.60
2014	3,535.58	3,535.58
2015	2,599.45	2,599.45
2016	176.60	176.60
2017	138.83	138.83
2017	25.00	25.00
2018	-	-
2018	421.00	421.00
2019	-	-
2020	-	-
2020	-	-
2021	-	-
2022	21.00	21.00
2022	-	-
2023	-	-
2024	-	-
Future		11,918.23
Total	38,104.34	49,726.57

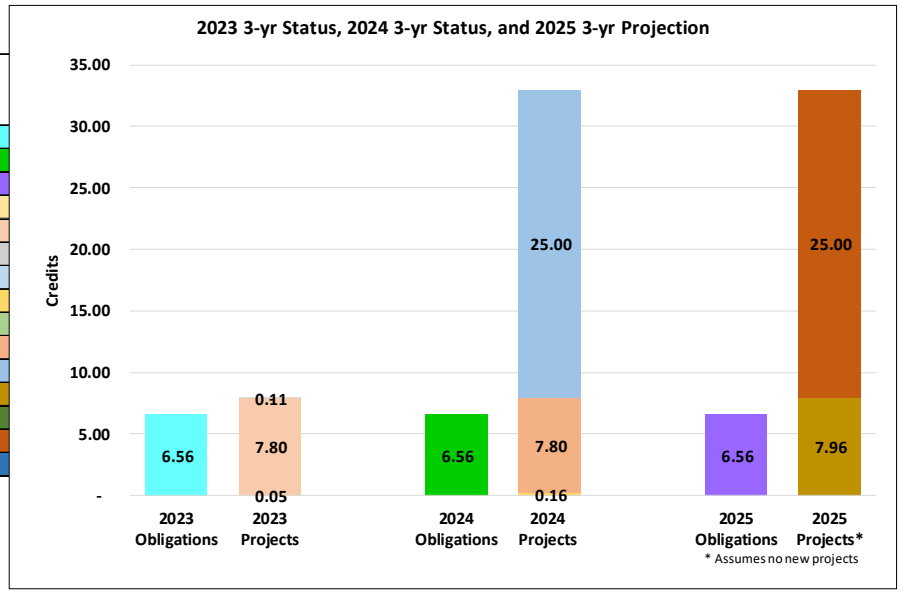
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects (credits)
Transition	3.550	3.550
2012	2.410	2.410
2013	0.024	0.024
2014	0.577	0.577
2015	-	-
2016	-	-
2017	-	-
2017	-	-
2018	-	-
2018	-	-
2019	-	-
2020	-	-
2020	-	-
2021	-	-
2022	-	-
2022	-	-
2023	-	-
2024	-	-
Future		26.399
Total	6.561	32.960

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued), Upper Cumberland Service Area Page 1: Credit sales and projects by year.

Upper Cumberland River Service Area

Stream			Sinking Valley	Sinking Valley WSP	Burnett Branch	Marsh Creek FID
Year	Credits Sold	All Projects (Credits)	Credit Est	Credit Est	Credit Est	Credit Est
Transition	3,954.00	3,954.00	3,502.60	228.00	223.40	-
2012	3,182.19	3,182.19	-	-	3,182.19	-
2013	49.50	49.50	-	-	49.50	-
2014	52.25	52.25	-	-	52.25	-
2015	298.00	298.00	-	-	298.00	-
2015	4,764.99	4,764.99	-	-	4,764.99	-
2016	22.03	22.03	-	-	22.03	-
2017	132.45	132.45	-	-	132.45	-
2017	-	-	-	-	-	-
2018	156.00	156.00	-	-	156.00	-
2018	343.70	343.70	-	-	343.70	-
2019	985.00	985.00	-	-	985.00	-
2020	-	-	-	-	-	-
2020	56.20	56.20	-	-	56.20	-
2021	59.40	59.40	-	-	59.40	-
2022	464.00	464.00	-	-	464.00	-
2022	-	-	-	-	-	-
2023	1,602.00	1,602.00	-	-	1,602.00	-
2024	2,601.50	2,233.00	-	-	1,199.00	1,034.00
Future		-	-	-	-	-
Total	18,721.21	18,355.60	3,502.60	228.00	13,501.00	1,034.00

Wetland			Marsh Creek FID
Year	Credits Sold	All Projects (Credits)	Credit Est
Transition	2.250	2.250	2.250
2012	0.381	0.381	0.381
2013	3.360	3.360	3.360
2014	4.438	4.438	4.438
2014	0.134	0.134	0.134
2015	7.278	7.278	7.278
2016	-	-	-
2017	-	-	-
2017	-	-	-
2018	-	-	-
2018	0.200	0.200	0.200
2019	0.700	0.700	0.700
2020	-	-	-
2020	1.100	1.100	1.100
2021	-	-	-
2022	-	-	-
2022		-	-
2023	-	-	-
2024	-	-	-
Future		7.250	7.250
Total	19.841	27.100	27.100

Appendix G (continued), Upper Cumberland Service Area Page 2: Cumulative credits by procedural milestone.

Upper Cumberland River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects (Credits)	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	3,954.00	3,954.00	3,730.60	3,730.60	3,954.00	3,954.00	3,730.60	3,730.60	3,730.60	3,954.00	3,954.00	3,954.00	3,954.00	3,954.00
2012	3,182.19	3,182.19	-	-	3,182.19	3,182.19	-	-	-	3,182.19	3,182.19	3,182.19	3,182.19	3,182.19
2013	49.50	49.50	-	-	49.50	49.50	-	-	-	49.50	49.50	49.50	49.50	49.50
2014	52.25	52.25	-	-	52.25	52.25	-	-	-	52.25	52.25	52.25	52.25	52.25
2015	298.00	298.00	-	-	298.00	298.00	-	-	-	298.00	298.00	298.00	298.00	298.00
2015	4,764.99	4,764.99	-	-	4,764.99	4,764.99	-	-	-	4,764.99	4,764.99	4,764.99	4,764.99	4,764.99
2016	22.03	22.03	-	-	22.03	22.03	-	-	-	22.03	22.03	22.03	22.03	22.03
2017	132.45	132.45	-	-	132.45	132.45	-	-	-	132.45	132.45	132.45	132.45	132.45
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	156.00	156.00	-	-	156.00	156.00	-	-	-	156.00	156.00	156.00	156.00	156.00
2018	343.70	343.70	-	-	343.70	343.70	-	-	-	343.70	343.70	343.70	343.70	343.70
2019	985.00	985.00	-	-	985.00	985.00	-	-	-	985.00	985.00	985.00	985.00	985.00
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	56.20	56.20	-	-	56.20	56.20	-	-	-	56.20	56.20	56.20	56.20	56.20
2021	59.40	59.40	-	-	59.40	59.40	-	-	-	59.40	59.40	59.40	59.40	59.40
2022	464.00	464.00	-	-	464.00	464.00	-	-	-	464.00	464.00	464.00	464.00	464.00
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	1,602.00	1,602.00	-	-	1,602.00	1,602.00	-	-	-	1,602.00	1,602.00	1,602.00	1,602.00	1,602.00
2024	2,601.50	2,233.89	-	-	2,233.89	2,233.89	-	-	-	2,233.89	2,233.89	2,233.89	2,233.89	2,233.89
Future		-	-	-	-	-	-	-	-	-	-	-	-	-
Total	18,723.21	18,355.60	3,730.60	3,730.60	18,355.60	18,355.60	3,730.60	3,730.60	3,730.60	18,355.60	18,355.60	18,355.60	18,355.60	18,355.60

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects (Credits)	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	2.250	2.250	-	-	2.25	2.25	-	-	-	2.25	2.25	2.25	2.25	2.25
2012	0.381	0.381	-	-	0.38	0.38	-	-	-	0.38	0.38	0.38	0.38	0.38
2013	3.360	3.360	-	-	3.36	3.36	-	-	-	3.36	3.36	3.36	3.36	3.36
2014	4.438	4.438	-	-	4.44	4.44	-	-	-	4.44	4.44	4.44	4.44	4.44
2014	0.134	0.134	-	-	0.13	0.13	-	-	-	0.13	0.13	0.13	0.13	0.13
2015	7.278	7.278	-	-	7.28	7.28	-	-	-	7.28	7.28	7.28	7.28	7.28
2016	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	0.200	0.200	-	-	0.20	0.20	-	-	-	0.20	0.20	0.20	0.20	0.20
2019	0.700	0.700	-	-	0.70	0.70	-	-	-	0.70	0.70	0.70	0.70	0.70
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	1.100	1.100	-	-	1.10	1.10	-	-	-	1.10	1.10	1.10	1.10	1.10
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022		-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		7.259	-	-	7.26	7.26	-	-	-	7.26	7.26	7.26	7.26	7.26
Total	19.841	27.100	-	-	27.10	27.10	-	-	-	27.10	27.10	27.10	27.10	27.10

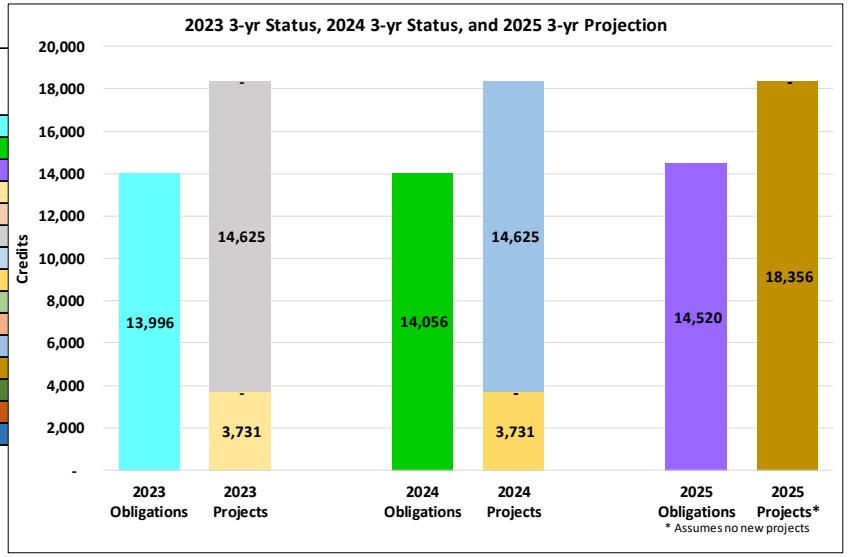
Appendix G (continued), Upper Cumberland Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Upper Cumberland River Service Area

Stream

Year	Credits Sold	All Projects (Credits)
Transition	3,954.00	3,954.00
2012	3,182.19	3,182.19
2013	49.50	49.50
2014	52.25	52.25
2015	298.00	298.00
2015	4,764.99	4,764.99
2016	22.03	22.03
2017	132.45	132.45
2017	-	-
2018	156.00	156.00
2018	343.70	343.70
2019	985.00	985.00
2020	-	-
2020	56.20	56.20
2021	59.40	59.40
2022	464.00	464.00
2022	-	-
2023	1,602.00	1,602.00
2024	2,601.50	2,233.89
Future		-
Total	18,723.21	18,355.60

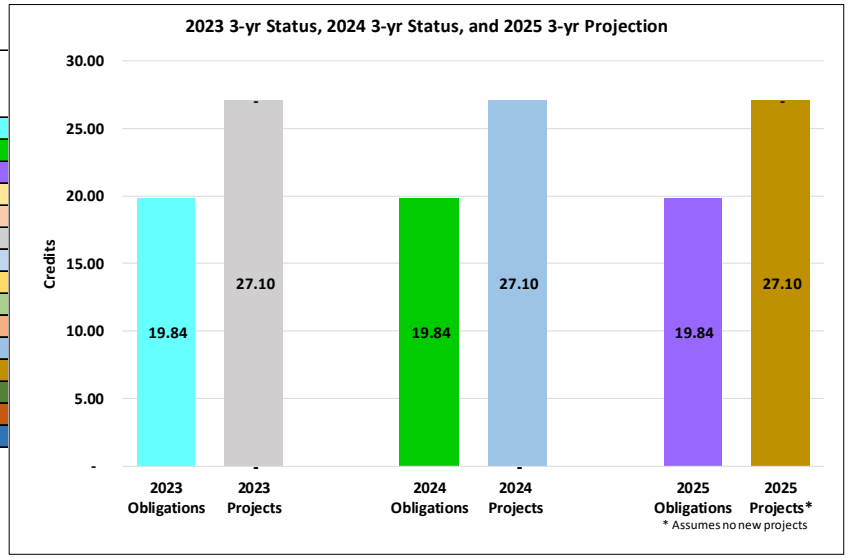
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects (Credits)
Transition	2.250	2.250
2012	0.381	0.381
2013	3.360	3.360
2014	4.438	4.438
2014	0.134	0.134
2015	7.278	7.278
2016	-	-
2017	-	-
2017	-	-
2018	-	-
2018	0.200	0.200
2019	0.700	0.700
2020	-	-
2020	1.100	1.100
2021	-	-
2022	-	-
2022		-
2023	-	-
2024	-	-
Future		7.259
Total	19.841	27.100

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued), Lower Cumberland Service Area Page 1: Credit sales and projects by year.

Lower Cumberland River Service Area

Stream			Blue Spring	Crow Creek	Ferguson Creek Wetlands	Mud Camp 2 (Walden)
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est	Credit Est
Transition	6,977.00	6,977.00	6,977.00	-	-	-
2012	8,893.00	8,893.00	8,893.00	-	-	-
2013	1,917.71	1,917.71	1,917.71	-	-	-
2014	2,346.00	2,346.00	2,346.00	-	-	-
2015	2,413.20	2,413.20	2,413.20	-	-	-
2016	850.00	850.00	850.00	-	-	-
2017	27,938.90	27,938.90	9,411.19	18,527.71	-	-
2017	8,696.60	8,696.60	-	8,696.60	-	-
2018	-	-	-	-	-	-
2018	-	-	-	-	-	-
2019	629.00	629.00	-	629.00	-	-
2020	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	4,576.00	4,576.00	-	4,576.00	-	-
2022	-	-	-	-	-	-
2022	-	-	-	-	-	-
2023	1,584.00	1,584.00	-	1,584.00	-	-
2024	174.00	174.00	-	174.00	-	-
Future		74,568.69	-	16,725.69	27,680.00	30,153.00
Total	85,695.41	141,564.10	32,408.10	50,912.00	27,680.00	30,153.00

Wetland			Hatchery Creek	Ferguson Creek Wetlands
Year	Credits Sold	All Projects	Credit Est	Credit Est
Transition	9.980	9.980	0.846	9.134
2012	4.180	4.180	-	4.180
2013	-	-	-	-
2014	3.600	3.600	-	3.600
2015	0.700	0.700	-	0.700
2016	-	-	-	-
2017	-	-	-	-
2017	5.483	5.483	-	5.483
2018	-	-	-	-
2018	-	-	-	-
2019	-	-	-	-
2020	-	-	-	-
2020	0.500	0.500	-	0.500
2021	-	-	-	-
2022	-	-	-	-
2022	-	-	-	-
2023	-	-	-	-
2024	-	-	-	-
Future		15.593	-	15.593
Total	24.443	40.036	0.846	39.190

Appendix G (continued), Lower Cumberland Service Area Page 2: Cumulative credits by procedural milestone.

Lower Cumberland River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00	6,977.00
2012	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00	8,893.00
2013	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71	1,917.71
2014	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00	2,346.00
2015	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20	2,413.20
2016	850.00	850.00	850.00	850.00	850.00	850.00	850.00	850.00	850.00	850.00	850.00	850.00	850.00	850.00
2017	27,938.90	27,938.90	9,411.19	27,938.90	27,938.90	27,938.90	9,411.19	9,411.19	27,938.90	27,938.90	9,411.19	27,938.90	27,938.90	27,938.90
2017	8,696.60	8,696.60	-	8,696.60	8,696.60	8,696.60	-	-	8,696.60	8,696.60	-	8,696.60	8,696.60	8,696.60
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	629.00	629.00	-	629.00	629.00	629.00	-	-	629.00	629.00	-	629.00	629.00	629.00
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	4,576.00	4,576.00	-	4,576.00	4,576.00	4,576.00	-	-	4,576.00	4,576.00	-	4,576.00	4,576.00	4,576.00
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	1,584.00	1,584.00	-	1,584.00	1,584.00	1,584.00	-	-	1,584.00	1,584.00	-	1,584.00	1,584.00	1,584.00
2024	174.00	174.00	-	174.00	174.00	174.00	-	-	174.00	174.00	-	174.00	174.00	174.00
Future		74,568.69	-	16,725.69	74,568.69	74,568.69	-	-	16,725.69	74,568.69	-	16,725.69	44,415.69	74,568.69
Total	66,995.41	141,564.10	32,808.10	83,721.10	141,564.10	141,564.10	32,808.10	32,808.10	83,721.10	141,564.10	32,808.10	83,721.10	111,411.10	141,564.10

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	9.980	9.980	0.85	0.85	9.98	9.98	0.85	0.85	0.85	9.98	0.85	0.85	9.98	9.98
2012	4.180	4.180	-	-	4.18	4.18	-	-	-	4.18	-	-	4.18	4.18
2013	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	3.600	3.600	-	-	3.60	3.60	-	-	-	3.60	-	-	3.60	3.60
2015	0.700	0.700	-	-	0.70	0.70	-	-	-	0.70	-	-	0.70	0.70
2016	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	5.483	5.483	-	-	5.48	5.48	-	-	-	5.48	-	-	5.48	5.48
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	0.500	0.500	-	-	0.50	0.50	-	-	-	0.50	-	-	0.50	0.50
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		15.593	-	-	15.59	15.59	-	-	-	15.59	-	-	15.59	15.59
Total	24.443	40.036	0.85	0.85	40.04	40.04	0.85	0.85	0.85	40.04	0.85	0.85	40.04	40.04

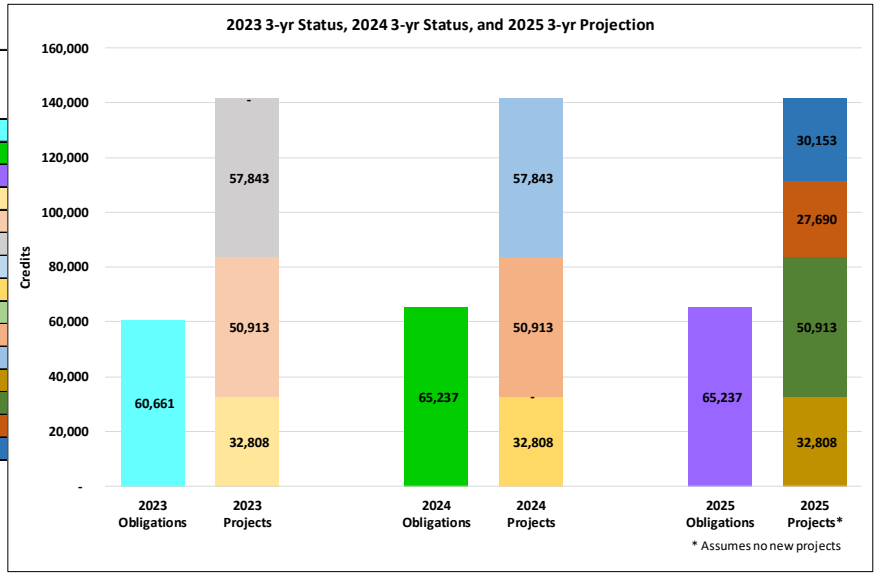
Appendix G (continued), Lower Cumberland Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Lower Cumberland River Service Area

Stream

Year	Credits Sold	All Projects
Transition	6,977.00	6,977.00
2012	8,893.00	8,893.00
2013	1,917.71	1,917.71
2014	2,346.00	2,346.00
2015	2,413.20	2,413.20
2016	850.00	850.00
2017	27,938.90	27,938.90
2017	8,696.60	8,696.60
2018	-	-
2018	-	-
2019	629.00	629.00
2020	-	-
2020	-	-
2021	4,576.00	4,576.00
2022	-	-
2022	-	-
2023	1,584.00	1,584.00
2024	174.00	174.00
Future		74,568.69
Total	66,995.41	141,564.10

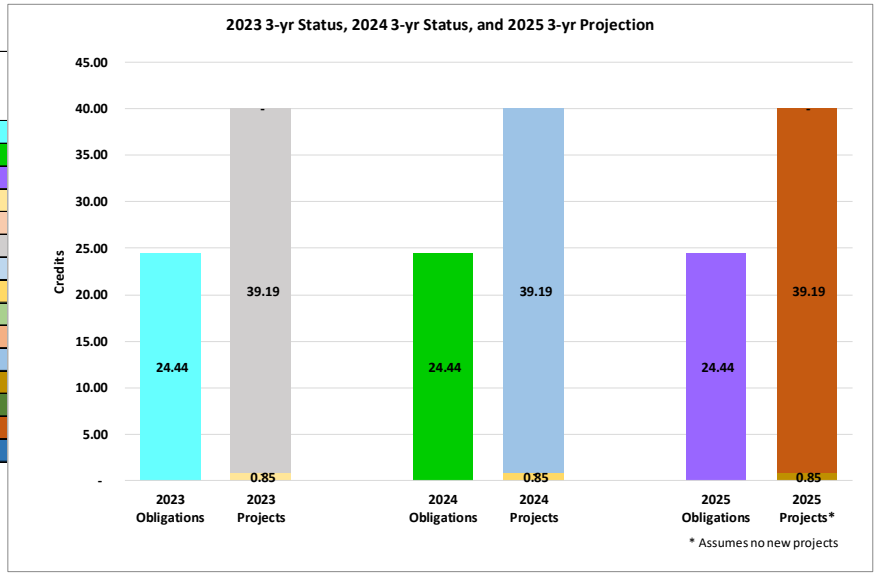
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	9.980	9.980
2012	4.180	4.180
2013	-	-
2014	3.600	3.600
2015	0.700	0.700
2016	-	-
2017	-	-
2017	5.483	5.483
2018	-	-
2018	-	-
2019	-	-
2020	-	-
2020	0.500	0.500
2021	-	-
2022	-	-
2022	-	-
2023	-	-
2024	-	-
Future		15.593
Total	24.443	40.036

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued), Green River Service Area Page 1: Credit sales and projects by year.

Green River Service Area

Stream			Eagle Creek UT	Goose Creek	Big Rivers	Bender Hollow	Gabbard Branch	Ivy Creek	Possum Hollow	Stone Creek 2
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est
Transition	14,251.00	14,251.00	1,848.00	12,403.00	-	-	-	-	-	-
2012	7,582.00	7,582.00	-	4,694.00	2,888.00	-	-	-	-	-
2012	3,142.60	3,142.60	-	-	530.00	2,612.60	-	-	-	-
2013	1,621.85	1,621.85	-	-	-	1,621.85	-	-	-	-
2014	14,688.21	14,688.21	-	-	-	14,688.21	-	-	-	-
2015	1,405.40	1,405.40	-	-	-	1,405.40	-	-	-	-
2016	2,343.00	2,343.00	-	-	-	1,033.94	1,309.06	-	-	-
2017	582.00	582.00	-	-	-	-	582.00	-	-	-
2017	2,434.00	2,434.00	-	-	-	-	2,434.00	-	-	-
2018	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-
2019	2,867.00	2,867.00	-	-	-	-	2,867.00	-	-	-
2020	-	-	-	-	-	-	-	-	-	-
2020	2,855.00	2,855.00	-	-	-	-	2,855.00	-	-	-
2021	7,877.00	7,877.00	-	-	-	-	7,877.00	-	-	-
2022	61,820.00	61,820.00	-	-	-	-	30,956.94	30,863.06	-	-
2022	-	-	-	-	-	-	-	-	-	-
2023	3,183.00	3,183.00	-	-	-	-	-	3,183.00	-	-
2024	6,396.00	5,606.06	-	-	-	-	-	3,696.06	1,709.00	-
Future		-	-	-	-	-	-	-	-	-
Total	133,050.06	132,260.50	1,848.00	17,097.00	3,418.00	21,362.00	48,881.00	37,905.50	1,709.00	-

Wetland			Eagle Creek UT	Goose Creek	Big Rivers		Gabbard Branch	Ivy Creek	Possum Hollow	Stone Creek 2
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est		Credit Est	Credit Est	Credit Est	Credit Est
Transition	10.280	10.280	10.280	-	-		-	-	-	-
2012	7.444	7.444	-	-	7.444		-	-	-	-
2013	3.814	3.814	-	-	3.814		-	-	-	-
2014	5.700	5.700	-	-	5.700		-	-	-	-
2015	11.190	11.190	-	-	11.190		-	-	-	-
2016	4.500	4.500	-	-	4.500		-	-	-	-
2017	3.000	3.000	-	-	3.000		-	-	-	-
2017	0.360	0.360	-	-	0.360		-	-	-	-
2018	7.400	7.400	-	-	2.792		4.608	-	-	-
2018	-	-	-	-	-		-	-	-	-
2019	7.300	7.300	-	-	-		7.300	-	-	-
2020	-	-	-	-	-		-	-	-	-
2020	-	-	-	-	-		-	-	-	-
2021	1.500	1.500	-	-	-		1.500	-	-	-
2022	38.500	38.500	-	-	-		5.122	18.300	15.078	-
2022	-	-	-	-	-		-	-	-	-
2023	2.600	2.600	-	-	-		-	-	2.600	-
2024	2.800	2.800	-	-	-		-	-	2.800	-
Future		72.292	-	-	-		-	-	72.292	-
Total	105.368	172.680	10.280	-	18.600		18.530	18.300	92.770	-

Appendix G (continued), Green River Service Area Page 2: Cumulative credits by procedural milestone.

Green River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00	14,251.00
2012	7,582.00	7,582.00	4,694.00	4,694.00	7,582.00	7,582.00	7,582.00	7,582.00	7,582.00	7,582.00	7,582.00	7,582.00	7,582.00	7,582.00
2012	3,142.60	3,142.60	-	-	3,142.60	3,142.60	530.00	530.00	3,142.60	3,142.60	3,142.60	3,142.60	3,142.60	3,142.60
2013	1,621.85	1,621.85	-	-	1,621.85	1,621.85	-	-	1,621.85	1,621.85	1,621.85	1,621.85	1,621.85	1,621.85
2014	14,688.21	14,688.21	-	-	14,688.21	14,688.21	-	-	14,688.21	14,688.21	14,688.21	14,688.21	14,688.21	14,688.21
2015	1,405.40	1,405.40	-	-	1,405.40	1,405.40	-	-	1,405.40	1,405.40	1,405.40	1,405.40	1,405.40	1,405.40
2016	2,343.00	2,343.00	-	-	2,343.00	2,343.00	-	-	2,343.00	2,343.00	1,033.94	2,343.00	2,343.00	2,343.00
2017	582.00	582.00	-	-	582.00	582.00	-	-	582.00	582.00	-	582.00	582.00	582.00
2017	2,434.00	2,434.00	-	-	2,434.00	2,434.00	-	-	2,434.00	2,434.00	-	2,434.00	2,434.00	2,434.00
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	2,867.00	2,867.00	-	-	2,867.00	2,867.00	-	-	2,867.00	2,867.00	-	2,867.00	2,867.00	2,867.00
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	2,855.00	2,855.00	-	-	2,855.00	2,855.00	-	-	2,855.00	2,855.00	-	2,855.00	2,855.00	2,855.00
2021	7,877.00	7,877.00	-	-	7,877.00	7,877.00	-	-	7,877.00	7,877.00	-	7,877.00	7,877.00	7,877.00
2022	61,820.00	61,820.00	-	-	61,820.00	61,820.00	-	-	30,956.94	61,820.00	-	30,956.94	61,820.00	61,820.00
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	3,183.00	3,183.00	-	-	3,183.00	3,183.00	-	-	-	3,183.00	-	-	3,183.00	3,183.00
2024	8,398.00	5,608.84	-	-	3,859.84	3,859.84	-	-	-	5,608.84	-	-	5,608.84	5,608.84
Future		-	-	-	-	-	-	-	-	-	-	-	-	-
Total	135,050.06	132,260.90	18,945.00	18,945.00	130,511.90	130,511.90	22,363.00	22,363.00	92,606.00	132,260.90	43,725.00	92,606.00	132,260.90	132,260.90

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	10.280	10.280	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28	10.28
2012	7.444	7.444	-	-	7.44	7.44	7.44	7.44	7.44	7.44	7.44	7.44	7.44	7.44
2013	3.814	3.814	-	-	3.81	3.81	3.81	3.81	3.81	3.81	3.81	3.81	3.81	3.81
2014	5.700	5.700	-	-	5.70	5.70	5.70	5.70	5.70	5.70	5.70	5.70	5.70	5.70
2015	11.190	11.190	-	-	11.19	11.19	11.19	11.19	11.19	11.19	11.19	11.19	11.19	11.19
2016	4.500	4.500	-	-	4.50	4.50	4.50	4.50	4.50	4.50	4.50	4.50	4.50	4.50
2017	3.000	3.000	-	-	3.00	3.00	3.00	3.00	3.00	3.00	3.00	3.00	3.00	3.00
2017	0.360	0.360	-	-	0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36
2018	7.400	7.400	-	-	7.40	7.40	2.79	2.79	7.40	7.40	2.79	7.40	7.40	7.40
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	7.300	7.300	-	-	7.30	7.30	-	-	7.30	7.30	-	7.30	7.30	7.30
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	1.500	1.500	-	-	1.50	1.50	-	-	1.50	1.50	-	1.50	1.50	1.50
2022	38.500	38.500	-	-	23.42	23.42	-	-	5.12	38.50	-	5.12	38.50	38.50
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	2.600	2.600	-	-	-	-	-	-	-	2.60	-	-	2.60	2.60
2024	2.800	2.800	-	-	-	-	-	-	-	2.80	-	-	2.80	2.80
Future		72.292	-	-	-	-	-	-	-	72.29	-	-	72.29	72.29
Total	106.388	178.680	10.28	10.28	85.91	85.91	49.08	49.08	67.61	178.68	49.08	67.61	178.68	178.68

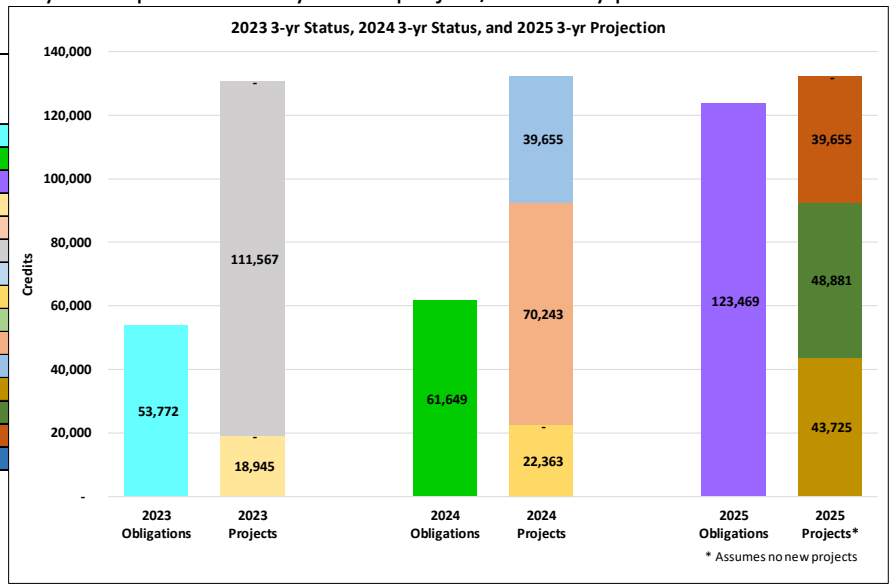
Appendix G (continued), Green River Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Green River Service Area

Stream

Year	Credits Sold	All Projects
Transition	14,251.00	14,251.00
2012	7,582.00	7,582.00
2012	3,142.60	3,142.60
2013	1,621.85	1,621.85
2014	14,688.21	14,688.21
2015	1,405.40	1,405.40
2016	2,343.00	2,343.00
2017	582.00	582.00
2017	2,434.00	2,434.00
2018	-	-
2018	-	-
2019	2,867.00	2,867.00
2020	-	-
2020	2,855.00	2,855.00
2021	7,877.00	7,877.00
2022	61,820.00	61,820.00
2022	-	-
2023	3,183.00	3,183.00
2024	8,398.00	5,608.84
Future		-
Total	135,050.06	132,260.90

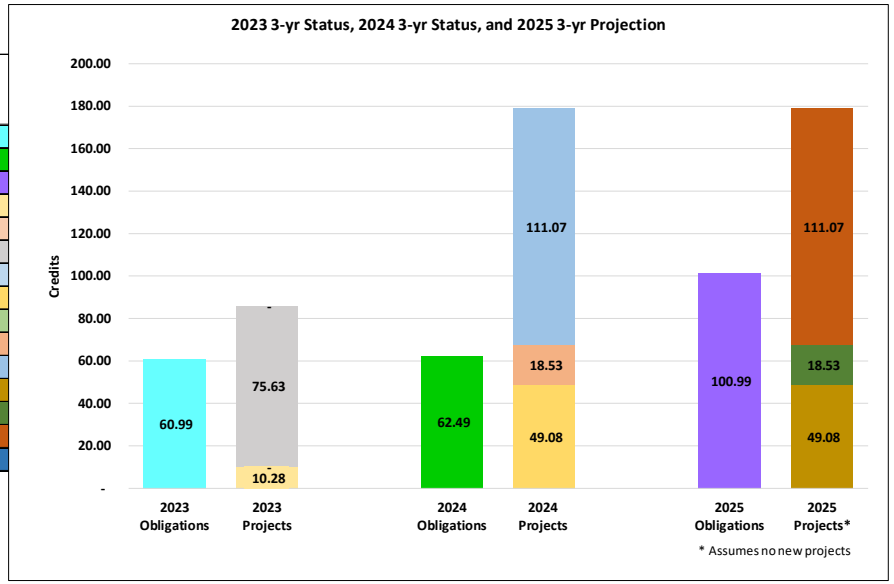
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	10.280	10.280
2012	7.444	7.444
2013	3.814	3.814
2014	5.700	5.700
2015	11.190	11.190
2016	4.500	4.500
2017	3.000	3.000
2017	0.360	0.360
2018	7.400	7.400
2018	-	-
2019	7.300	7.300
2020	-	-
2020	-	-
2021	1.500	1.500
2022	38.500	38.500
2022	-	-
2023	2.600	2.600
2024	2.800	2.800
Future		72.292
Total	106.388	178.680

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued), Jackson Purchase Service Area Page 1: Credit sales and projects by year.

Jackson Purchase Service Area

Stream			Obi on 2	Kaler Bottom	Cope Creek	Rhineheart Branch	JPFAs (Entra Obion 2)
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est
Transition	19.00	19.00	19.00	-	-	-	-
2012	-	-	-	-	-	-	-
2013	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-
2015	1,209.49	1,209.49	1,209.49	-	-	-	-
2016	1,140.00	1,140.00	1,140.00	-	-	-	-
2017	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-
2018	480.00	480.00	480.00	-	-	-	-
2019	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-
2020	66.00	66.00	66.00	-	-	-	-
2021	5,925.00	5,925.00	5,925.00	-	-	-	-
2022	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-
2023	**3,299.00**	**3,299.00**	**160.31**	**588.70**	**2,634.79**	-	-
2024	**68.60**	**68.60**	-	-	**68.60**	-	-
Future	-	**18,085.61**	-	-	**985.61**	**2,800.00**	**14,300.00**
Total	**12,207.09**	**34,292.70**	**9,000.00**	**588.70**	**3,679.00**	**2,800.00**	**14,300.00**

Wetland			Obi on 2	Kaler Bottom	Cope Creek	Rhineheart Branch	JPFAs (Entra Obion 2)
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est
Transition	2.300	2.300	2.300	-	-	-	-
2012	-	-	-	-	-	-	-
2013	0.820	0.820	0.820	-	-	-	-
2014	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-
2020	3.600	3.600	3.600	-	-	-	-
2021	4.700	4.700	4.700	-	-	-	-
2022	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-
2024	**0.600**	**0.600**	**0.560**	**0.020**	-	-	-
Future		**71.680**	-	**7.180**	**25.000**	**1.500**	**38.000**
Total	**12.020**	**88.700**	**12.000**	**7.200**	**25.000**	**1.500**	**38.000**

Appendix G (continued), Jackson Purchase Service Area Page 2: Cumulative credits by procedural milestone.

Jackson Purchase Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	19.00	19.00	19.00	19.00	19.00	19.00	19.00	19.00	19.00	19.00	19.00	19.00	19.00	19.00
2012	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2013	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49	1,209.49
2016	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00	1,140.00
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	480.00	480.00	480.00	480.00	480.00	480.00	480.00	480.00	480.00	480.00	480.00	480.00	480.00	480.00
2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	66.00	66.00	66.00	66.00	66.00	66.00	66.00	66.00	66.00	66.00	66.00	66.00	66.00	66.00
2021	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00	5,925.00
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	3,299.00	3,299.00	160.51	160.51	674.21	674.21	160.51	160.51	160.51	674.21	160.51	160.51	3,299.00	3,299.00
2024	68.60	68.60	-	-	-	-	-	-	-	-	-	-	68.60	68.60
Future	-	18,085.61	-	-	-	-	-	-	-	-	-	-	985.61	3,785.61
Total	12,207.09	30,292.70	9,000.00	9,000.00	9,513.70	9,513.70	9,000.00	9,000.00	9,000.00	9,513.70	9,000.00	9,000.00	13,192.70	15,992.70

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	2.300	2.300	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30	2.30
2012	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2013	0.820	0.820	0.82	0.82	0.82	0.82	0.82	0.82	0.82	0.82	0.82	0.82	0.82	0.82
2014	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	3.600	3.600	3.60	3.60	3.60	3.60	3.60	3.60	3.60	3.60	3.60	3.60	3.60	3.60
2021	4.700	4.700	4.70	4.70	4.70	4.70	4.70	4.70	4.70	4.70	4.70	4.70	4.70	4.70
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	0.600	0.600	0.58	0.58	0.60	0.60	0.58	0.58	0.58	0.60	0.58	0.58	0.60	0.60
Future		71.680	-	-	7.18	7.18	-	-	-	7.18	-	-	32.18	33.68
Total	12.020	83.700	12.00	12.00	19.20	19.20	12.00	12.00	12.00	19.20	12.00	12.00	44.20	45.70

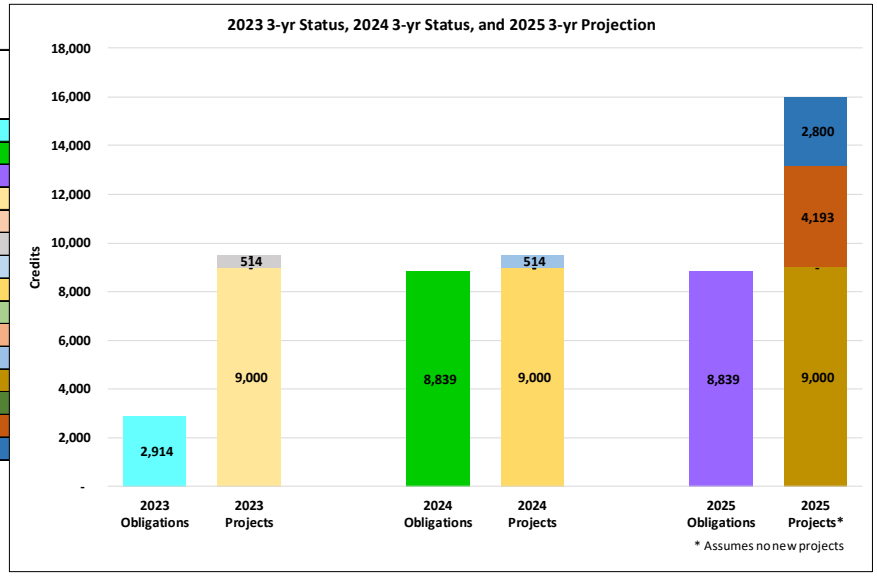
Appendix G (continued), Jackson Purchase Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Jackson Purchase Service Area

Stream

Year	Credits Sold	All Projects
Transition	19.00	19.00
2012	-	-
2013	-	-
2014	-	-
2015	1,209.49	1,209.49
2016	1,140.00	1,140.00
2017	-	-
2017	-	-
2018	-	-
2018	480.00	480.00
2019	-	-
2020	-	-
2020	66.00	66.00
2021	5,925.00	5,925.00
2022	-	-
2022	-	-
2023	3,299.00	3,299.00
2024	68.60	68.60
Future	-	18,085.61
Total	12,207.09	30,292.70

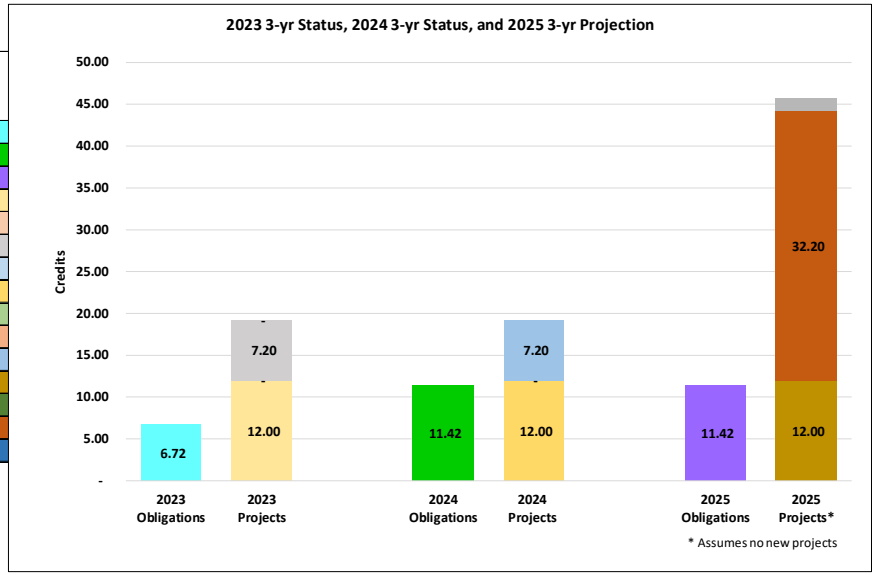
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	2.300	2.300
2012	-	-
2013	0.820	0.820
2014	-	-
2015	-	-
2016	-	-
2017	-	-
2017	-	-
2018	-	-
2018	-	-
2019	-	-
2020	-	-
2020	3.600	3.600
2021	4.700	4.700
2022	-	-
2022	-	-
2023	-	-
2024	0.600	0.600
Future		71.680
Total	12.020	83.700

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued), Upper Kentucky Service Area Page 1: Credit sales and projects by year.

Upper Kentucky River Service Area

Stream			Ross Creek 2	Little Sexton Creek	Ross Creek 3	Ross Creek 6	Red Lick IV
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est
Transition	-	-	-	-		-	-
2012	2,349.86	2,349.86	1,494.00	855.86	-	-	-
2013	999.13	999.13	-	999.13	-	-	-
2014	2,037.17	2,037.17	-	2,037.17	-	-	-
2015	965.86	965.86	-	965.86	-	-	-
2016	7,398.89	7,398.89	-	7,398.89	-	-	-
2017	5,368.72	5,368.72	-	5,368.72	-	-	-
2017	-	-	-	-	-	-	-
2018	1,648.00	1,648.00	-	1,648.00	-	-	-
2018	1,296.00	1,296.00	-	1,296.00	-	-	-
2019	9,093.00	9,093.00	-	9,093.00	-	-	-
2020	-	-	-	-	-	-	-
2020	634.00	634.00	-	634.00	-	-	-
2021	3,337.00	3,337.00	-	1,493.37	1,791.60	52.03	-
2022	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-
Future		2,979.97	-	-	-	2,979.97	-
Total	35,127.63	38,107.60	1,494.00	33,790.09	1,791.60	3,032.00	0

Wetland			Ross Creek 1	Little Sexton Creek ACID		Red Lick IV
Year	Credits Sold	All Projects	Credit Est	Credit Est		Credit Est
Transition	-	-	-	-		-
2012	-	-	-	-		-
2013	1.200	1.200	1.200	-		-
2014	-	-	-	-		-
2015	-	-	-	-		-
2016	3.300	3.300	3.300	-		-
2017	8.950	8.950	0.700	4.000		4.250
2017	-	-	-	-		-
2018	2.100	2.100	-	-		2.100
2018	-	-	-	-		-
2019	5.200	5.200	-	-		5.200
2020	0.400	0.400	-	-		0.400
2020	-	-	-	-		-
2021	4.910	4.910	-	-		4.910
2022	-	-	-	-		-
2022	-	-	-	-		-
2023	-	-	-	-		-
2024	0.400	0.400	-	-		0.400
Future		0.340	-	-		0.340
Total	35.460	35.800	5.200	4.000		26.600

Appendix G (continued), Upper Kentucky Service Area Page 2: Cumulative credits by procedural milestone.

Upper Kentucky River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2012	2,349.86	2,349.86	1,494.00	1,494.00	2,349.86	2,349.86	1,494.00	1,494.00	2,349.86	2,349.86	1,494.00	1,494.00	2,349.86	2,349.86
2013	999.13	999.13	-	-	999.13	999.13	-	-	999.13	999.13	-	-	999.13	999.13
2014	2,037.17	2,037.17	-	-	2,037.17	2,037.17	-	-	2,037.17	2,037.17	-	-	2,037.17	2,037.17
2015	965.86	965.86	-	-	965.86	965.86	-	-	965.86	965.86	-	-	965.86	965.86
2016	7,398.89	7,398.89	-	-	7,398.89	7,398.89	-	-	7,398.89	7,398.89	-	-	7,398.89	7,398.89
2017	5,368.72	5,368.72	-	-	5,368.72	5,368.72	-	-	5,368.72	5,368.72	-	-	5,368.72	5,368.72
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	1,648.00	1,648.00	-	-	1,648.00	1,648.00	-	-	1,648.00	1,648.00	-	-	1,648.00	1,648.00
2018	1,296.00	1,296.00	-	-	1,296.00	1,296.00	-	-	1,296.00	1,296.00	-	-	1,296.00	1,296.00
2019	9,093.00	9,093.00	-	-	9,093.00	9,093.00	-	-	9,093.00	9,093.00	-	-	9,093.00	9,093.00
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	634.00	634.00	-	-	634.00	634.00	-	-	634.00	634.00	-	-	634.00	634.00
2021	3,337.00	3,337.00	-	-	3,284.97	3,337.00	-	-	1,493.37	3,337.00	-	-	3,284.97	3,337.00
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		2,979.97	-	-	-	2,979.97	-	-	-	2,979.97	-	-	-	2,979.97
Total	35,127.63	38,107.60	1,494.00	1,494.00	35,075.60	38,107.60	1,494.00	1,494.00	33,284.00	38,107.60	1,494.00	1,494.00	35,075.60	38,107.60

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2012	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2013	1.200	1.200	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20
2014	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2016	3.300	3.300	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30
2017	8.950	8.950	0.70	0.70	4.70	4.70	0.70	0.70	4.70	4.70	0.70	0.70	4.70	8.95
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	2.100	2.100	-	-	-	-	-	-	-	-	-	-	-	2.10
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	5.200	5.200	-	-	-	-	-	-	-	-	-	-	-	5.20
2020	0.400	0.400	-	-	-	-	-	-	-	-	-	-	-	0.40
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	4.910	4.910	-	-	-	-	-	-	-	-	-	-	-	4.91
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	9.400	9.400	-	-	-	-	-	-	-	-	-	-	-	9.40
Future		0.340	-	-	-	-	-	-	-	-	-	-	-	0.34
Total	35.460	35.800	5.20	5.20	9.20	9.20	5.20	5.20	9.20	9.20	5.20	5.20	9.20	35.80

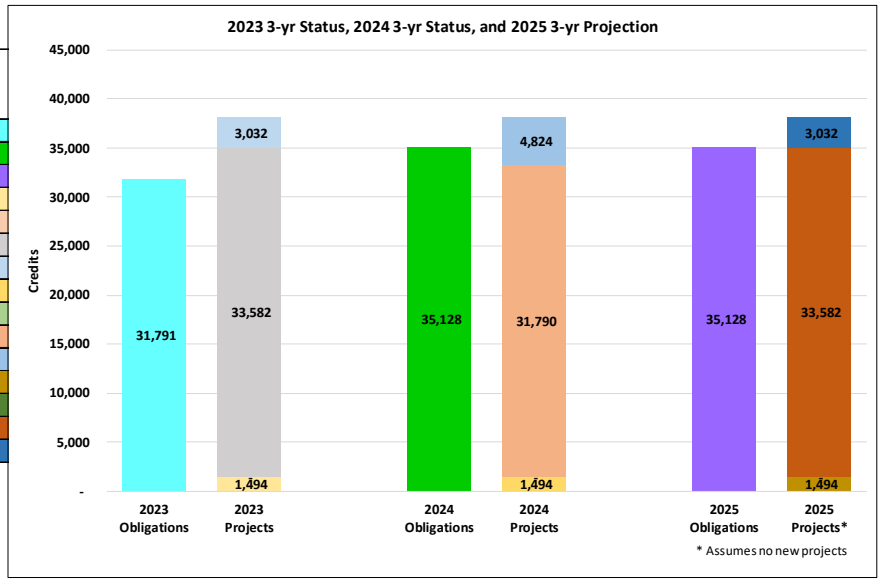
Appendix G (continued), Upper Kentucky Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Upper Kentucky River Service Area

Stream

Year	Credits Sold	All Projects
Transition	-	-
2012	2,349.86	2,349.86
2013	999.13	999.13
2014	2,037.17	2,037.17
2015	965.86	965.86
2016	7,398.89	7,398.89
2017	5,368.72	5,368.72
2017	-	-
2018	1,648.00	1,648.00
2018	1,296.00	1,296.00
2019	9,093.00	9,093.00
2020	-	-
2020	634.00	634.00
2021	3,337.00	3,337.00
2022	-	-
2022	-	-
2023	-	-
2024	-	-
Future		2,979.97
Total	35,127.63	38,107.60

Histogram Legend
- 2023 Obligations
- 2024 Obligations
- 2025 Obligations
- 2023 Construction Commenced
- 2023 IPBI (Post 2024 Definition)
- 2023 IPBI (Pre 2024 Definition)
- 2023 CP/Prospectus Approved
- 2024 Construction Commenced
- 2024 Permit Authorized
- 2024 IPBI (Post 2024 Definition)
- 2024 CP/Prospectus Approved
- 2025 Construction Commencement
- 2025 Permit Authorization
- 2025 IPBI (Post 2024 Definition)
- 2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	-	-
2012	-	-
2013	1.200	1.200
2014	-	-
2015	-	-
2016	3.300	3.300
2017	8.950	8.950
2017	-	-
2018	2.100	2.100
2018	-	-
2019	5.200	5.200
2020	0.400	0.400
2020	-	-
2021	4.910	4.910
2022	-	-
2022	-	-
2023	-	-
2024	9.400	9.400
Future		0.340
Total	35.460	35.800

Histogram Legend
- 2023 Obligations
- 2024 Obligations
- 2025 Obligations
- 2023 Construction Commenced
- 2023 IPBI (Post 2024 Definition)
- 2023 IPBI (Pre 2024 Definition)
- 2023 CP/Prospectus Approved
- 2024 Construction Commenced
- 2024 Permit Authorized
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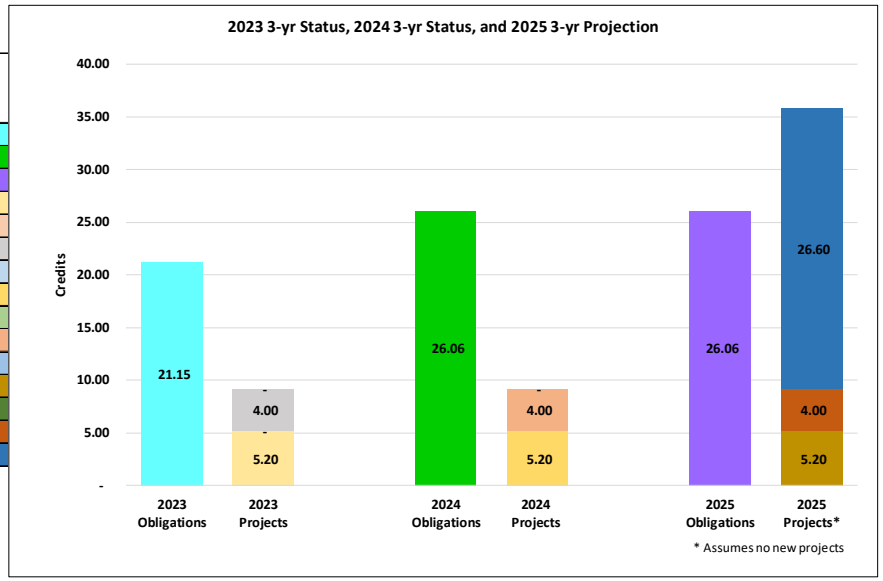
- 2024 CP/Prospectus Approved
- 2025 Construction Commencement
- 2025 Permit Authorization
- 2025 IPBI (Post 2024 Definition)
- 2025 CP/Prospectus Approval



Appendix G (continued), Lower Kentucky Service Area Page 1: Credit sales and projects by year.

Lower Kentucky River Service Area

Stream			Minors Creek	Minors Creek WSP	Red Oak Creek C	Red Oak Creek B	Red Oak Creek A	Red Oak Creek D	Pond Creek		Minors Creek 2 (Bogardus)
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est		Credit Est
Transition	-	-	-	-	-	-	-	-	-		-
2012	807.00	807.00	807.00	-	-	-	-	-	-		-
2013	14,654.20	14,654.20	14,654.20	-	-	-	-	-	-		-
2014	606.00	606.00	606.00	-	-	-	-	-	-		-
2015	3,095.00	3,095.00	3,095.00	-	-	-	-	-	-		-
2016	409.00	409.00	409.00	-	-	-	-	-	-		-
2017	883.00	883.00	883.00	-	-	-	-	-	-		-
2017	240.00	240.00	240.00	-	-	-	-	-	-		-
2018	618.00	618.00	618.00	-	-	-	-	-	-		-
2018	586.00	586.00	132.80	453.20	-	-	-	-	-		-
2019	1,043.00	1,043.00	-	169.80	873.20	-	-	-	-		-
2020	3,565.00	3,565.00	-	-	3,565.00	-	-	-	-		-
2020	1,211.00	1,211.00	-	-	1,211.00	-	-	-	-		-
2021	-	-	-	-	-	-	-	-	-		-
2022	1,468.00	1,468.00	-	-	1,256.80	211.20	-	-	-		-
2022	5,320.00	5,320.00	-	-	-	5,320.00	-	-	-		-
2023	[illegible]	[illegible]	-	-	-	[illegible]	-	-	-		-
2024	291.20	291.20	-	-	-	291.20	-	-	-		-
Future		15,586.00	-	-	-	4,179.00	4,142.00	2,855.00	309.00		2,021.00
Total	37,814.40	51,311.00	21,445.00	623.00	6,906.00	12,501.00	4,142.00	2,855.00	309.00		2,021.00

Wetland						Red Oak Creek B		Pond Creek	Cave Creek	Browns Bottom	
Year	Credits Sold	All Projects				Credit Est		Credit Est	Credit Est	Credit Est	
Transition	1.800	1.800				1.800		-	-	-	
2012	1.032	1.032				0.600		0.432	-	-	
2013	3.170	3.170				-		3.170	-	-	
2014	0.400	0.400				-		0.400	-	-	
2015	2.120	2.120				-		2.120	-	-	
2016	1.310	1.310				-		1.310	-	-	
2017	-	-				-		-	-	-	
2017	0.300	0.300				-		0.300	-	-	
2018	0.300	0.300				-		0.300	-	-	
2018	1.800	1.800				-		1.800	-	-	
2019	1.100	1.100				-		1.100	-	-	
2020	0.900	0.900				-		0.900	-	-	
2020	0.500	0.500				-		0.500	-	-	
2021	-	-				-		-	-	-	
2022	0.400	0.400				-		0.008	0.392	-	
2022	2.000	2.000				-		-	2.000	-	
2023	-	-				-		-	-	-	
2024	[illegible]	[illegible]				-		-	[illegible]	-	
Future		[illegible]				-		-	[illegible]	[illegible]	
Total	[illegible]	[illegible]				[illegible]		[illegible]	[illegible]	[illegible]	

Appendix G (continued), Lower Kentucky Service Area Page 2: Cumulative credits by procedural milestone.

Lower Kentucky River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2012	807.00	807.00	807.00	807.00	807.00	807.00	807.00	807.00	807.00	807.00	807.00	807.00	807.00	807.00
2013	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20	14,654.20
2014	606.00	606.00	606.00	606.00	606.00	606.00	606.00	606.00	606.00	606.00	606.00	606.00	606.00	606.00
2015	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00	3,095.00
2016	409.00	409.00	409.00	409.00	409.00	409.00	409.00	409.00	409.00	409.00	409.00	409.00	409.00	409.00
2017	883.00	883.00	883.00	883.00	883.00	883.00	883.00	883.00	883.00	883.00	883.00	883.00	883.00	883.00
2017	240.00	240.00	240.00	240.00	240.00	240.00	240.00	240.00	240.00	240.00	240.00	240.00	240.00	240.00
2018	618.00	618.00	618.00	618.00	618.00	618.00	618.00	618.00	618.00	618.00	618.00	618.00	618.00	618.00
2018	586.00	586.00	586.00	586.00	586.00	586.00	586.00	586.00	586.00	586.00	586.00	586.00	586.00	586.00
2019	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00	1,043.00
2020	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00	3,565.00
2020	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00	1,211.00
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	1,468.00	1,468.00	1,256.80	1,256.80	1,468.00	1,468.00	1,468.00	1,468.00	1,468.00	1,468.00	1,468.00	1,468.00	1,468.00	1,468.00
2022	5,320.00	5,320.00	-	-	5,320.00	5,320.00	5,320.00	5,320.00	5,320.00	5,320.00	5,320.00	5,320.00	5,320.00	5,320.00
2023	3,068.00	3,068.00	-	-	3,068.00	3,068.00	3,068.00	3,068.00	3,068.00	3,068.00	3,068.00	3,068.00	3,068.00	3,068.00
2024	231.20	231.20	-	-	231.20	231.20	231.20	231.20	231.20	231.20	231.20	231.20	231.20	231.20
Future		13,506.60	-	373.00	13,506.60	13,506.60	11,112.60	11,112.60	11,485.60	13,506.60	11,485.60	11,485.60	11,485.60	13,506.60
Total	37,804.40	51,311.00	28,974.00	29,347.00	51,311.00	51,311.00	48,917.00	48,917.00	49,290.00	51,311.00	49,290.00	49,290.00	49,290.00	51,311.00

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	1.800	1.800	-	-	1.80	1.80	1.80	1.80	1.80	1.80	1.80	1.80	1.80	1.80
2012	1.032	1.032	-	0.43	1.03	1.03	0.60	0.60	1.03	1.03	1.03	1.03	1.03	1.03
2013	3.170	3.170	-	3.17	3.17	3.17	-	-	3.17	3.17	3.17	3.17	3.17	3.17
2014	0.400	0.400	-	0.40	0.40	0.40	-	-	0.40	0.40	0.40	0.40	0.40	0.40
2015	2.120	2.120	-	2.12	2.12	2.12	-	-	2.12	2.12	2.12	2.12	2.12	2.12
2016	1.310	1.310	-	1.31	1.31	1.31	-	-	1.31	1.31	1.31	1.31	1.31	1.31
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	0.300	0.300	-	0.30	0.30	0.30	-	-	0.30	0.30	0.30	0.30	0.30	0.30
2018	0.300	0.300	-	0.30	0.30	0.30	-	-	0.30	0.30	0.30	0.30	0.30	0.30
2018	1.800	1.800	-	1.80	1.80	1.80	-	-	1.80	1.80	1.80	1.80	1.80	1.80
2019	1.100	1.100	-	1.10	1.10	1.10	-	-	1.10	1.10	1.10	1.10	1.10	1.10
2020	0.900	0.900	-	0.90	0.90	0.90	-	-	0.90	0.90	0.90	0.90	0.90	0.90
2020	0.500	0.500	-	0.50	0.50	0.50	-	-	0.50	0.50	0.50	0.50	0.50	0.50
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	0.400	0.400	-	0.01	0.01	0.40	-	-	0.01	0.40	0.01	0.01	0.40	0.40
2022	2.000	2.000	-	-	-	2.00	-	-	-	2.00	-	-	2.00	2.00
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	0.400	0.400	-	-	-	0.40	-	-	-	0.40	-	-	0.40	0.40
Future		15.258	-	-	-	15.26	-	-	-	15.26	-	-	15.26	15.26
Total	17.532	32.790	-	12.34	14.74	32.79	2.40	2.40	14.74	32.79	14.74	14.74	32.79	32.79

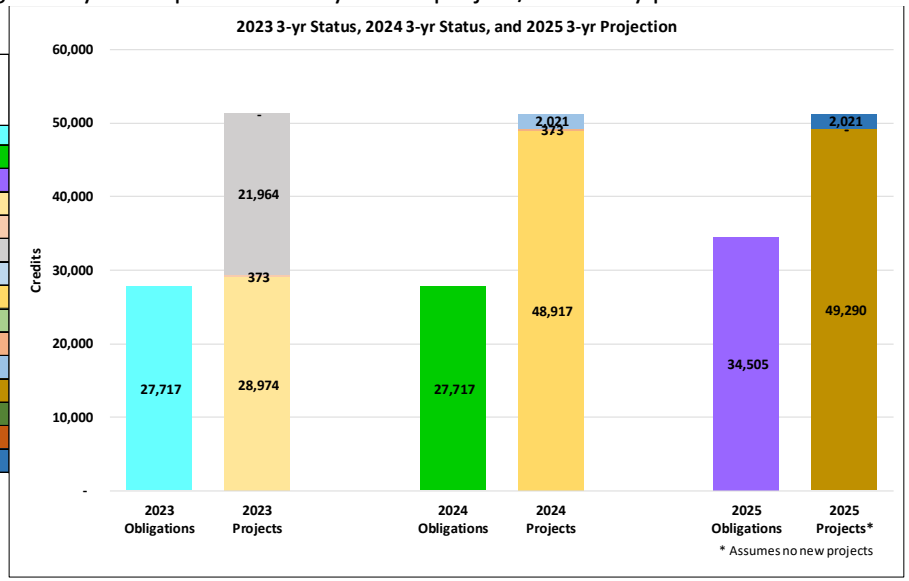
Appendix G (continued), Lower Kentucky Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Lower Kentucky River Service Area

Stream

Year	Credits Sold	All Projects
Transition	-	-
2012	807.00	807.00
2013	14,654.20	14,654.20
2014	606.00	606.00
2015	3,095.00	3,095.00
2016	409.00	409.00
2017	883.00	883.00
2017	240.00	240.00
2018	618.00	618.00
2018	586.00	586.00
2019	1,043.00	1,043.00
2020	3,565.00	3,565.00
2020	1,211.00	1,211.00
2021	-	-
2022	1,468.00	1,468.00
2022	5,320.00	5,320.00
2023	3,068.00	3,068.00
2024	231.20	231.20
Future		13,506.60
Total	37,804.40	51,311.00

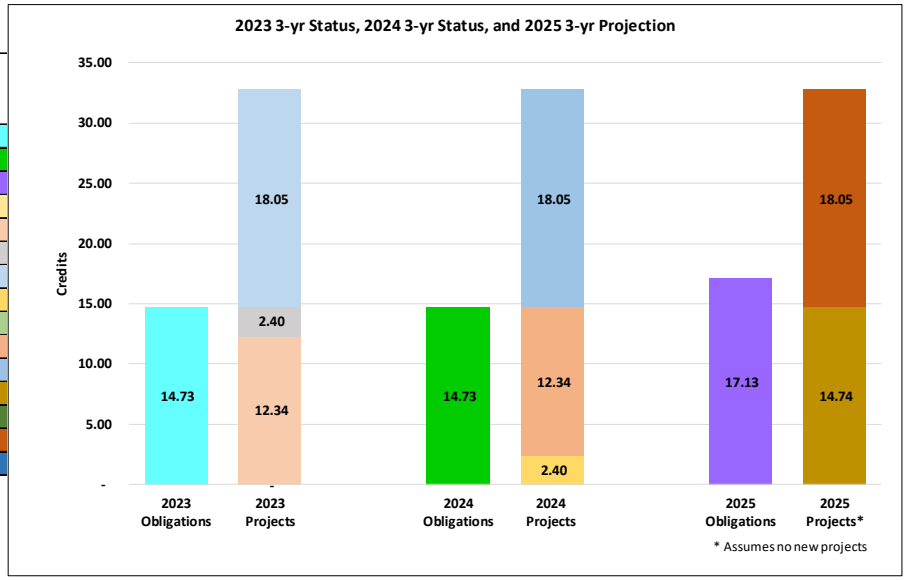
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	1.800	1.800
2012	1.032	1.032
2013	3.170	3.170
2014	0.400	0.400
2015	2.120	2.120
2016	1.310	1.310
2017	-	-
2017	0.300	0.300
2018	0.300	0.300
2018	1.800	1.800
2019	1.100	1.100
2020	0.900	0.900
2020	0.500	0.500
2021	-	-
2022	0.400	0.400
2022	2.000	2.000
2023	-	-
2024	0.400	0.400
Future		15.258
Total	17.532	32.790

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued), Upper Licking Service Area Page 1: Credit sales and projects by year.

Upper Licking River Service Area

Stream			Broke Leg Creek Phase 1	Horse Mill North	Broke Leg Creek Phase 2	Horse Mill South	Slabcamp Branch CDE	Slabcamp Branch ABFGH
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est
Transition	258.00	258.00	258.00	-	-	-	-	-
2012	838.00	838.00	838.00	-	-	-	-	-
2013	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-
2015	5,464.00	5,464.00	5,464.00	-	-	-	-	-
2015	1,967.00	1,967.00	1,967.00	-	-	-	-	-
2016	931.00	931.00	931.00	-	-	-	-	-
2017	1,944.60	1,944.60	1,944.60	-	-	-	-	-
2017	2,271.00	2,271.00	473.40	1,797.60	-	-	-	-
2018	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-
2020	219.00	219.00	-	219.00	-	-	-	-
2021	-	-	-	-	-	-	-	-
2022	261.00	261.00	-	261.00	-	-	-	-
2022	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-
Future		37,726.40	-	1,187.40	922.00	5,500.00	9,500.00	20,626.00
Total	14,153.60	51,880.00	11,676.00	3,466.00	922.00	5,500.00	9,500.00	20,626.00

Wetland			MEOW	Horse Mill North	Horse Mill South
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est
Transition	-	-	-	-	-
2012	-	-	-	-	-
2013	-	-	-	-	-
2014	-	-	-	-	-
2015	14.220	14.220	14.220	-	-
2016	-	-	-	-	-
2017	-	-	-	-	-
2017	-	-	-	-	-
2018	-	-	-	-	-
2018	-	-	-	-	-
2019	-	-	-	-	-
2020	-	-	-	-	-
2020	-	-	-	-	-
2021	-	-	-	-	-
2022	6.400	6.400	6.400	-	-
2022	-	-	-	-	-
2023	-	-	-	-	-
2024	-	-	-	-	-
Future		22.850	18.000	0.850	4.040
Total	20.620	43.470	38.620	0.850	4.040

Appendix G (continued), Upper Licking Service Area Page 2: Cumulative credits by procedural milestone.

Upper Licking River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	258.00	258.00	-	-	258.00	258.00	-	258.00	-	258.00	258.00	258.00	258.00	258.00
2012	838.00	838.00	-	-	838.00	838.00	-	838.00	-	838.00	838.00	838.00	838.00	838.00
2013	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	5,464.00	5,464.00	-	-	5,464.00	5,464.00	-	5,464.00	-	5,464.00	5,464.00	5,464.00	5,464.00	5,464.00
2015	1,967.00	1,967.00	-	-	1,967.00	1,967.00	-	1,967.00	-	1,967.00	1,967.00	1,967.00	1,967.00	1,967.00
2016	931.00	931.00	-	-	931.00	931.00	-	931.00	-	931.00	931.00	931.00	931.00	931.00
2017	1,944.60	1,944.60	-	-	1,944.60	1,944.60	-	1,944.60	-	1,944.60	1,944.60	1,944.60	1,944.60	1,944.60
2017	2,271.00	2,271.00	-	-	2,271.00	2,271.00	-	473.40	1,797.60	2,271.00	473.40	2,271.00	2,271.00	2,271.00
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	219.00	219.00	-	-	219.00	219.00	-	-	219.00	219.00	-	219.00	219.00	219.00
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	261.00	261.00	-	-	261.00	261.00	-	-	261.00	261.00	-	261.00	261.00	261.00
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		37,726.40	-	-	37,726.40	37,726.40	-	-	6,688.40	37,726.40	-	7,610.40	7,610.40	37,726.40
Total	14,153.60	51,880.00	-	-	51,880.00	51,880.00	-	11,876.00	8,966.00	51,880.00	11,876.00	21,764.00	21,764.00	51,880.00

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2012	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2013	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	14.220	14.220	-	-	14.22	14.22	-	-	14.22	14.22	14.22	14.22	14.22	14.22
2016	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	6.400	6.400	-	-	6.40	6.40	-	-	6.40	6.40	6.40	6.40	6.40	6.40
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		22.850	-	-	22.85	22.85	-	-	22.85	22.85	18.00	22.85	22.85	22.85
Total	20.620	43.470	-	-	43.47	43.47	-	-	43.47	43.47	38.62	43.47	43.47	43.47

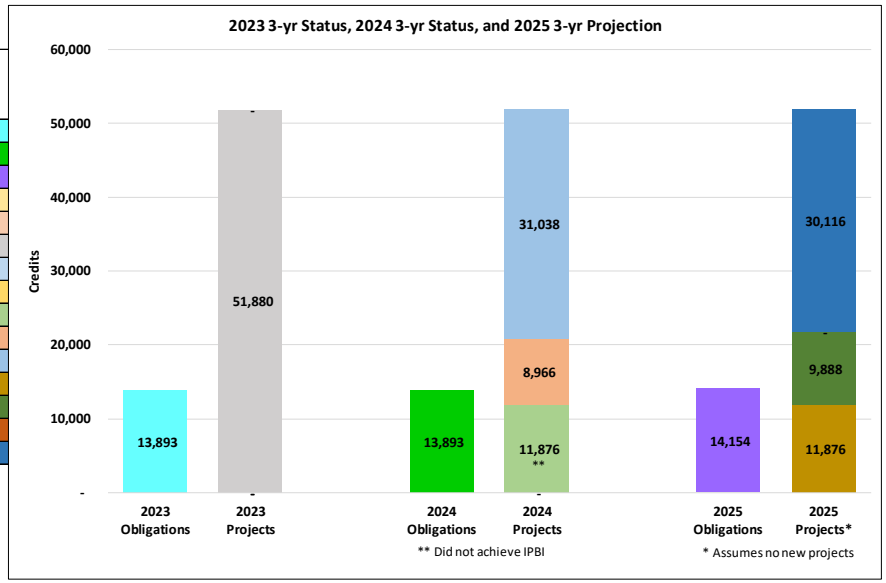
Appendix G (continued), Upper Licking Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Upper Licking River Service Area

Stream

Year	Credits Sold	All Projects
Transition	258.00	258.00
2012	838.00	838.00
2013	-	-
2014	-	-
2015	5,464.00	5,464.00
2015	1,967.00	1,967.00
2016	931.00	931.00
2017	1,944.60	1,944.60
2017	2,271.00	2,271.00
2018	-	-
2018	-	-
2019	-	-
2020	-	-
2020	219.00	219.00
2021	-	-
2022	261.00	261.00
2022	-	-
2023	-	-
2024	-	-
Future		37,726.40
Total	14,153.60	51,880.00

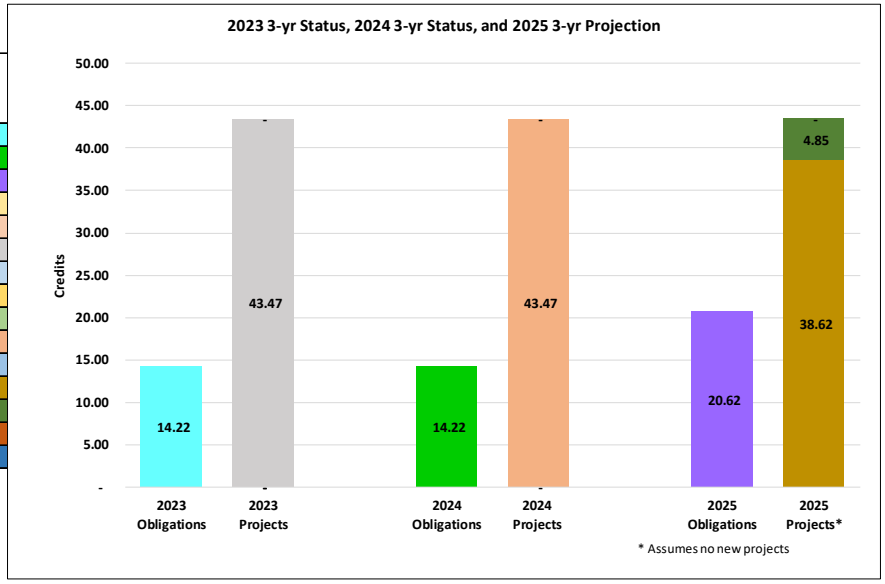
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	-	-
2012	-	-
2013	-	-
2014	-	-
2015	14.220	14.220
2016	-	-
2017	-	-
2017	-	-
2018	-	-
2018	-	-
2019	-	-
2020	-	-
2020	-	-
2021	-	-
2022	6.400	6.400
2022	-	-
2023	-	-
2024	-	-
Future		22.850
Total	20.620	43.470

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued), Lower Licking Service Area Page 1: Credit sales and projects by year.

Lower Licking River Service Area

Stream			Myers Station	Myers Station WSP	Big Farm	Big Farm WSP	Drip Springs (Rock Lick Trib)	Rock Lick Creek
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est	Credit Est
Transition	11,419.00	11,419.00	11,419.00	-	-	-	-	-
2012	11,012.00	11,012.00	2,424.43	599.00	7,988.57	-	-	-
2013	-	-	-	-	-	-	-	-
2014	1,411.00	1,411.00	-	-	1,411.00	-	-	-
2015	10,935.00	10,935.00	-	-	10,935.00	-	-	-
2015	-	-	-	-	-	-	-	-
2016	3,399.72	3,399.72	-	-	3,399.72	-	-	-
2017	861.35	861.35	-	-	861.35	-	-	-
2017	-	-	-	-	-	-	-	-
2018	805.00	805.00	-	-	805.00	-	-	-
2018	725.00	725.00	-	-	725.00	-	-	-
2019	1,008.00	1,008.00	-	-	1,008.00	-	-	-
2020	-	-	-	-	-	-	-	-
2020	1,188.00	1,188.00	-	-	1,188.00	-	-	-
2021	3,284.00	3,284.00	-	-	3,284.00	-	-	-
2022	4,005.00	4,005.00	-	-	4,005.00	-	-	-
2022	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-
2024	593.00	593.00	-	-	593.00	-	-	-
Future		56,601.36	-	-	3,687.36	979.00	9,157.00	42,978.00
Total	50,646.07	107,447.43	13,843.43	599.00	39,881.00	979.00	9,157.00	42,978.00

Wetland			Big Farm	Drip Springs (Rock Lick Trib)	Rock Lick Creek
Year	Credits Sold	All Projects	Credit Est	Credit Est	Credit Est
Transition	0.980	0.980	0.980	-	-
2012	-	-	-	-	-
2013	-	-	-	-	-
2014	-	-	-	-	-
2015	-	-	-	-	-
2016	-	-	-	-	-
2017	-	-	-	-	-
2017	-	-	-	-	-
2018	-	-	-	-	-
2018	-	-	-	-	-
2019	1.600	1.600	1.600	-	-
2020	-	-	-	-	-
2020	-	-	-	-	-
2021	2.400	2.400	2.400	-	-
2022	1.500	1.500	1.500	-	-
2022	-	-	-	-	-
2023	-	-	-	-	-
2024	-	-	-	-	-
Future		60.820	17.820	2.500	40.500
Total	6.480	67.300	24.300	2.500	40.500

Appendix G (continued), Lower Licking Service Area Page 2: Cumulative credits by procedural milestone.

Lower Licking River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00	11,419.00
2012	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00	11,012.00
2013	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00	1,411.00
2015	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00	10,935.00
2015	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2016	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72	3,399.72
2017	861.35	861.35	861.35	861.35	861.35	861.35	861.35	861.35	861.35	861.35	861.35	861.35	861.35	861.35
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	805.00	805.00	805.00	805.00	805.00	805.00	805.00	805.00	805.00	805.00	805.00	805.00	805.00	805.00
2018	725.00	725.00	725.00	725.00	725.00	725.00	725.00	725.00	725.00	725.00	725.00	725.00	725.00	725.00
2019	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00	1,008.00
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00	1,188.00
2021	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00	3,284.00
2022	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00	4,005.00
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	593.00	593.00	593.00	593.00	593.00	593.00	593.00	593.00	593.00	593.00	593.00	593.00	593.00	593.00
Future		56,801.36	4,666.36	4,666.36	4,666.36	56,801.36	4,666.36	4,666.36	4,666.36	56,801.36	4,666.36	4,666.36	4,666.36	56,801.36
Total	50,646.07	107,447.43	55,312.43	55,312.43	55,312.43	107,447.43	55,312.43	55,312.43	55,312.43	107,447.43	55,312.43	55,312.43	55,312.43	107,447.43

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	0.980	0.980	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
2012	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2013	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	1.600	1.600	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60	1.60
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	2.400	2.400	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40	2.40
2022	1.500	1.500	1.50	1.50	1.50	1.50	1.50	1.50	1.50	1.50	1.50	1.50	1.50	1.50
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		60.820	17.82	17.82	17.82	60.82	17.82	17.82	17.82	60.82	17.82	17.82	17.82	60.82
Total	6.480	67.300	24.30	24.30	24.30	67.30	24.30	24.30	24.30	67.30	24.30	24.30	24.30	67.30

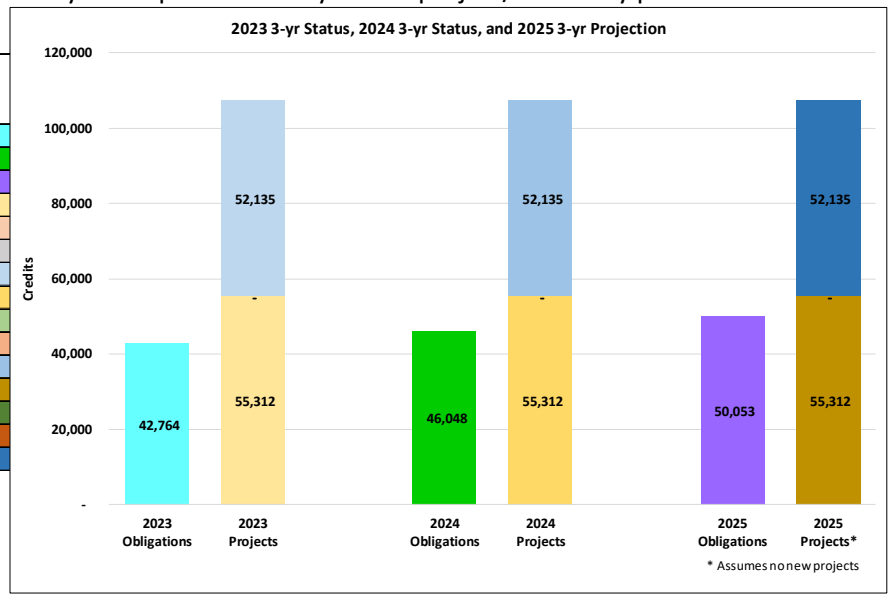
Appendix G (continued), Lower Licking Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Lower Licking River Service Area

Stream

Year	Credits Sold	All Projects
Transition	11,419.00	11,419.00
2012	11,012.00	11,012.00
2013	-	-
2014	1,411.00	1,411.00
2015	10,935.00	10,935.00
2015	-	-
2016	3,399.72	3,399.72
2017	861.35	861.35
2017	-	-
2018	805.00	805.00
2018	725.00	725.00
2019	1,008.00	1,008.00
2020	-	-
2020	1,188.00	1,188.00
2021	3,284.00	3,284.00
2022	4,005.00	4,005.00
2022	-	-
2023	-	-
2024	593.00	593.00
Future		56,801.36
Total	50,646.07	107,447.43

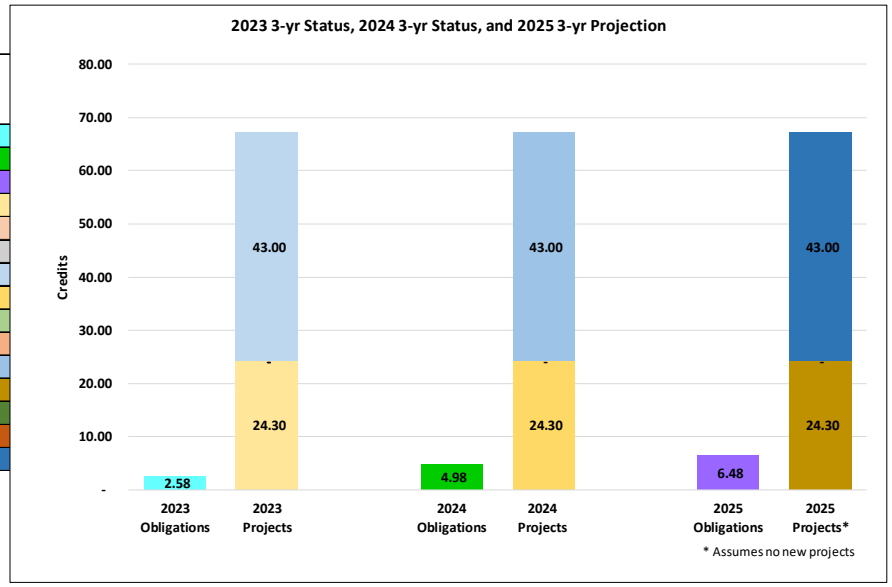
Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	0.980	0.980
2012	-	-
2013	-	-
2014	-	-
2015	-	-
2016	-	-
2017	-	-
2017	-	-
2018	-	-
2018	-	-
2019	1.600	1.600
2020	-	-
2020	-	-
2021	2.400	2.400
2022	1.500	1.500
2022	-	-
2023	-	-
2024	-	-
Future		60.820
Total	6.480	67.300

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued), Northern Kentucky Service Area Page 1: Credit sales and projects by year.

Northern Kentucky Service Area

Stream			Meadowland FD	Middle Creek 1 (LIM)	Middle Creek 2	Middle Creek 3 (Anderson)	Steep Creek		Trib to Twelvemile	Gunpowder I (YMCA)	Big Bone Lick Lake/Tribs	Upper Range Creek		Gunpowder II [MM]
Year	Credits Sold	All Projects	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.		Credit Est.	Credit Est.	Credit Est.	Credit Est.		Credit Est.
2018	5,194.00	5,194.0	5,194.0	-	-	-	-		-	-	-	-		-
2019	87,682.50	87,682.5	19,840.0	16,742.0	23,575.0	7,365.0	20,159.5		-	-	-	-		-
2020	7,123.50	7,123.5	-	-	-	-	1,172.5		5,951.0	-	-	-		-
2020	-	-	-	-	-	-	-		-	-	-	-		-
2021	-	-	-	-	-	-	-		-	-	-	-		-
2022	-	-	-	-	-	-	-		-	-	-	-		-
2022	630.00	630.0	-	-	-	-	-		630.0	-	-	-		-
2023	5,357.00	5,357.0	-	-	-	-	-		5,357.0	5,357.0	-	-		-
2024	1,592.00	1,592.0	-	-	-	-	-		-	1,592.0	-	-		-
Future		44,494.0	-	-	-	-	-		-	1,592.0	10,500.0	1,594.0		10,594.0
Total	107,580.00	157,074.0	25,034.0	16,742.0	23,575.0	7,365.0	21,332.0		7,938.0	6,949.0	10,500.0	1,594.0		10,594.0

Wetland			Middle Creek 1 (LIM)	Middle Creek 2	St. Anne Wetland	Big Bone Lick Lake/Tribs	Bradley Fork	Gunpowder II [MM]
Year	Credits Sold	All Projects	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.
2018	-	-	-	-	-	-	-	-
2019	30.700	30.700	1.790	10.870	8.754	7.030	2.256	-
2020	0.400	0.400	-	-	-	-	0.400	-
2020	1.900	1.900	-	-	-	-	1.344	0.556
2021	2.100	2.100	-	-	-	-	-	2.100
2022	6.000	0.404	-	-	-	-	-	0.404
2022	1.400	-	-	-	-	-	-	-
2023	0.500	-	-	-	-	-	-	-
2024	4.000	-	-	-	-	-	-	-
Future		-	-	-	-	-	-	-
Total	46.000	33.504	1.790	10.870	8.754	7.030	4.000	3.060

Appendix G (continued), Northern Kentucky Service Area Page 2: Cumulative credits by procedural milestone.

Northern Kentucky Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
2018	5,194.00	5,194.0	-	5,194.00	5,194.00	5,194.00	-	5,194.00	5,194.00	5,194.00	5,194.00	5,194.00	5,194.00	5,194.00
2019	87,682.50	87,682.5	-	36,583.00	87,682.50	87,682.50	-	19,841.00	36,583.00	87,682.50	87,682.50	87,682.50	87,682.50	87,682.50
2020	7,123.50	7,123.5	-	-	7,123.50	7,123.50	-	-	-	7,123.50	1,172.50	7,123.50	7,123.50	7,123.50
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	630.00	630.0	-	-	630.00	630.00	-	-	-	630.00	-	630.00	630.00	630.00
2023	5,117.00	5,117.0	-	-	1,412.00	5,117.00	-	-	-	5,117.00	-	1,412.00	1,412.00	5,117.00
2024	1,792.00	1,792.0	-	-	-	1,792.00	-	-	-	1,792.00	-	-	-	1,792.00
Future		44,474.0	-	-	-	1,472.00	-	-	-	11,639.00	-	-	-	14,217.00
Total	107,539.00	152,013.0	-	41,777.00	102,042.00	109,011.00	-	25,035.00	41,777.00	119,178.00	94,049.00	102,042.00	102,042.00	121,756.00

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
2018	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	30.700	30.700	-	1.79	21.41	21.41	-	-	1.79	28.44	12.66	21.41	21.41	30.70
2020	0.400	0.400	-	-	-	-	-	-	-	-	-	-	-	0.40
2020	1.900	1.900	-	-	-	-	-	-	-	-	-	-	-	1.34
2021	2.100	2.100	-	-	-	-	-	-	-	-	-	-	-	-
2022	6.000	0.404	-	-	-	-	-	-	-	-	-	-	-	-
2022	1.400	-	-	-	-	-	-	-	-	-	-	-	-	-
2023	0.300	-	-	-	-	-	-	-	-	-	-	-	-	-
2024	4.000	-	-	-	-	-	-	-	-	-	-	-	-	-
Future		-	-	-	-	-	-	-	-	-	-	-	-	-
Total	46.800	35.504	-	1.79	21.41	21.41	-	-	1.79	28.44	12.66	21.41	21.41	32.44

Appendix G (continued), Northern Ky Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

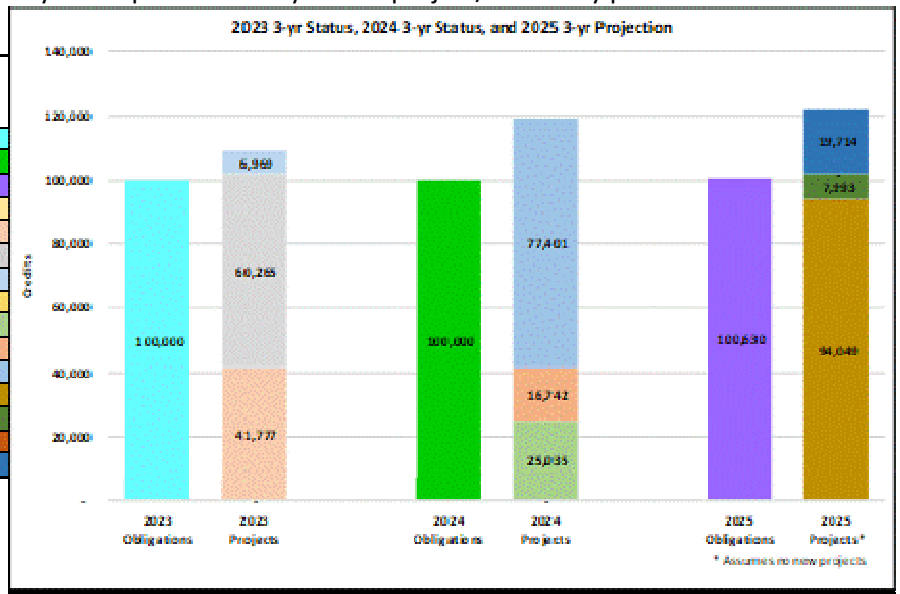
Northern Kentucky Service Area

Stream

Year	Credits Sold	All Projects
2018	5,194.00	5,194.0
2019	87,682.50	87,682.5
2020	7,123.50	7,123.5
2020	-	-
2021	-	-
2022	-	-
2022	630.00	630.0
2023	**5,117.00**	**5,117.0**
2024	**1,792.00**	**1,792.0**
Future		**44,470.0**
Total	**107,538.00**	**152,815.0**

Histogram Legend

- 2023 Obligations
- 2024 Obligations
- 2025 Obligations
- 2023 Construction Commenced
- 2023 IPBI (Post 2024 Definition)
- 2023 IPBI (Pre 2024 Definition)
- 2023 CP/Prospectus Approved
- 2024 Construction Commenced
- 2024 Permit Authorized
- 2024 IPBI (Post 2024 Definition)
- 2024 CP/Prospectus Approved
- 2025 Construction Commencement
- 2025 Permit Authorization
- 2025 IPBI (Post 2024 Definition)
- 2025 CP/Prospectus Approval

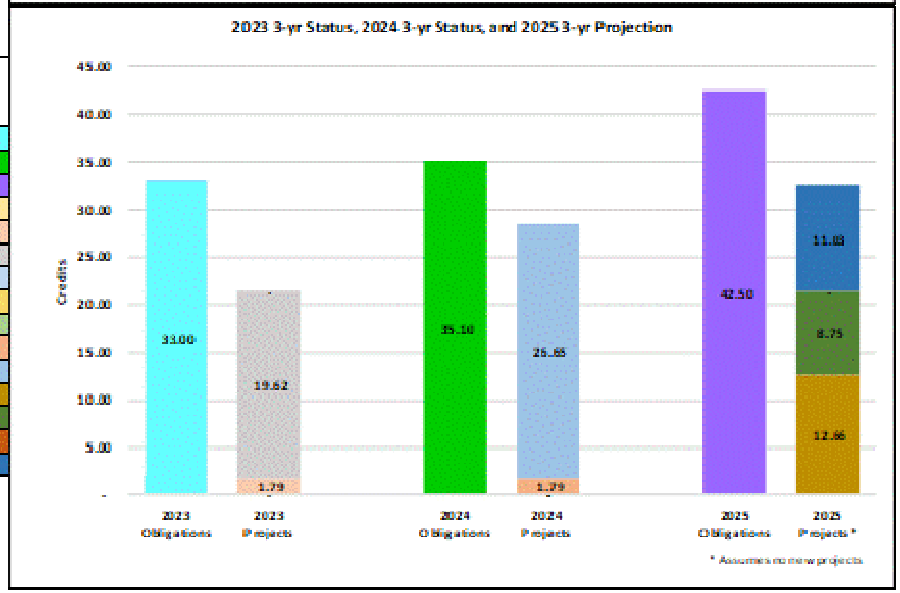


Wetland

Year	Credits Sold	All Projects
2018	-	-
2019	30.700	30.700
2020	0.400	0.400
2020	1.900	1.900
2021	2.100	2.100
2022	6.000	0.404
2022	1.400	-
2023	**0.500**	-
2024	**4.000**	-
Future		-
Total	**46.600**	**35.504**

Histogram Legend

- 2023 Obligations
- 2024 Obligations
- 2025 Obligations
- 2023 Construction Commenced
- 2023 IPBI (Post 2024 Definition)
- 2023 IPBI (Pre 2024 Definition)
- 2023 CP/Prospectus Approved
- 2024 Construction Commenced
- 2024 Permit Authorized
- 2024 IPBI (Post 2024 Definition)
- 2024 CP/Prospectus Approved
- 2025 Construction Commencement
- 2025 Permit Authorization
- 2025 IPBI (Post 2024 Definition)
- 2025 CP/Prospectus Approval



Appendix G (continued), Salt River Service Area Page 1: Credit sales and projects by year.

Salt River Service Area

Stream			Big Lick RD	Stillwell Branch	Rolling Fork FP	Dodge Gap	Wolf Run	Mill Creek Segment 2	Mill Creek Segment 1	Rolling Fork River	Otter Creek	Mill Creek Segment 3	Mill Creek Segment 4	Mill Creek Segment 5
Year	Credits Sold	All Projects	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.	Credit Est.
Transition	3,883.00	3,883.00	3,883.00	-	-	-	-	-	-	-	-	-	-	-
2012	1,338.15	1,338.15	1,338.15	-	-	-	-	-	-	-	-	-	-	-
2013	4,928.00	4,928.00	4,928.00	-	-	-	-	-	-	-	-	-	-	-
2014	5,807.09	5,807.09	5,807.09	-	-	-	-	-	-	-	-	-	-	-
2015	7,968.80	7,968.80	7,400.76	568.04	-	-	-	-	-	-	-	-	-	-
2016	3,968.00	3,968.00	-	3,968.00	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	83,154.00	83,154.00		70,023.96	3,806.00	9,524.04	-	-	-	-	-	-	-	-
2018	72.00	72.00	-	-	-	72.00	-	-	-	-	-	-	-	-
2018	11,225.00	11,225.00	-	-	-	2,068.96	9,156.04	-	-	-	-	-	-	-
2019	231.00	231.00	-	-	-	-	231.00	-	-	-	-	-	-	-
2020	90.00	90.00	-	-	-	-	90.00	-	-	-	-	-	-	-
2020	7,102.00	7,102.00	-	-	-	-	7,102.00	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	2,737.00	2,737.00	-	-	-	-	2,737.00	-	-	-	-	-	-	-
2022	2,696.00	2,696.00	-	-	-	-	2,696.00	-	-	-	-	-	-	-
2023	5,565.00	5,565.00	-	-	-	-	1,558.96	1,005.04	-	-	-	-	-	-
2024	9,050.00	9,050.00	-	-	-	-	-	9,050.00	-	-	-	-	-	-
Totals		184,010.16	-	-	-	-	-	9,050.00	11,174.00	11,000.56	17,515.00	18,117.00	12,070.00	11,000.00
Total	316,214.04	372,254.50	25,357.00	74,560.00	9,806.00	11,665.00	23,552.00	20,104.00	22,174.00	22,000.56	17,515.00	18,117.00	12,070.00	11,000.00

Wetland				Rolling Fork FP		Wolf Run	Mill Creek Segment 2	Mill Creek Segment 1		Otter Creek	Mill Creek Segment 3	Mill Creek Segment 4	Mill Creek Segment 5
Year	Credits Sold	All Projects		Credit Est.		Credit Est.	Credit Est.	Credit Est.		Credit Est.	Credit Est.	Credit Est.	Credit Est.
Transition	2.540	2.540		2.540		-	-	-		-	-	-	-
2012	-	-		-		-	-	-		-	-	-	-
2013	1.900	1.900		1.900		-	-	-		-	-	-	-
2014	-	-		-		-	-	-		-	-	-	-
2015	0.723	0.723		0.723		-	-	-		-	-	-	-
2016	16.300	16.300		16.300		-	-	-		-	-	-	-
2017	2.800	2.800		2.800		-	-	-		-	-	-	-
2017	14.400	14.400		14.400		-	-	-		-	-	-	-
2018	1.400	1.400		1.400		-	-	-		-	-	-	-
2018	2.100	2.100		2.100		-	-	-		-	-	-	-
2019	3.900	3.900		3.900		-	-	-		-	-	-	-
2020	-	-		-		-	-	-		-	-	-	-
2020	0.400	0.400		0.400		-	-	-		-	-	-	-
2021	35.100	35.100		21.837		6.700	6.563	-		-	-	-	-
2022	28.600	28.600		-		-	28.600	-		-	-	-	-
2022	1.300	1.300		-		-	1.300	-		-	-	-	-
2023	11.000	11.000		-		-	11.000	-		-	-	-	-
2024	4.000	4.000		-		-	2.457	1.543		-	-	-	-
Totals		95.575		-		-	-	15.157		4.125	52.000	-	5.100
Total	217.945	313.520		66.000		6.700	70.000	22.000		4.125	52.000	-	5.100

Appendix G (continued), Salt River Service Area Page 2: Cumulative credits by procedural milestone.

Salt River Service Area

Stream			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00	3,883.00
2012	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15	1,338.15
2013	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00	4,928.00
2014	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09	5,607.09
2015	7,968.80	7,968.80	7,400.76	7,400.76	7,968.80	7,968.80	7,400.76	7,968.80	7,400.76	7,968.80	7,968.80	7,968.80	7,968.80	7,968.80
2016	3,968.00	3,968.00	-	-	3,968.00	3,968.00	-	3,968.00	-	3,968.00	3,968.00	3,968.00	3,968.00	3,968.00
2017	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	83,154.00	83,154.00	-	-	83,154.00	83,154.00	-	73,629.96	-	83,154.00	83,154.00	83,154.00	83,154.00	83,154.00
2018	72.00	72.00	-	-	72.00	72.00	-	-	-	72.00	72.00	72.00	72.00	72.00
2018	11,225.00	11,225.00	-	-	11,225.00	11,225.00	-	-	-	11,225.00	11,225.00	11,225.00	11,225.00	11,225.00
2019	231.00	231.00	-	-	231.00	231.00	-	-	-	231.00	231.00	231.00	231.00	231.00
2020	90.00	90.00	-	-	90.00	90.00	-	-	-	90.00	90.00	90.00	90.00	90.00
2020	7,102.00	7,102.00	-	-	7,102.00	7,102.00	-	-	-	7,102.00	7,102.00	7,102.00	7,102.00	7,102.00
2021	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2022	2,737.00	2,737.00	-	-	2,737.00	2,737.00	-	-	-	2,737.00	2,737.00	2,737.00	2,737.00	2,737.00
2022	2,696.00	2,696.00	-	-	2,696.00	2,696.00	-	-	-	2,696.00	2,696.00	2,696.00	2,696.00	2,696.00
2023	3,385.00	3,385.00	-	-	1,539.96	3,385.00	-	-	-	3,385.00	1,539.96	3,385.00	1,539.96	3,385.00
2024	9,859.00	9,859.00	-	-	-	9,859.00	-	-	-	9,859.00	-	9,859.00	-	9,859.00
Future		124,010.46	-	-	39,213.50	124,010.46	-	-	-	124,010.46	-	31,663.96	-	124,010.46
Total	148,244.04	272,254.50	23,157.00	23,157.00	175,753.50	272,254.50	23,157.00	101,323.00	23,157.00	272,254.50	136,540.00	179,908.00	136,540.00	272,254.50

Wetland			2023	2023	2023	2023	2024	2024	2024	2024	2025	2025	2025	2025
Year	Credits Sold	All Projects	Construction Commenced	IPBI (Post 2024 Definition)	IPBI (Pre 2024 Definition)	CP/ Prospectus Approved	Construction Commenced	Permit Authorized	IPBI (Post 2024 Definition)	CP/ Prospectus Approved	Construction Commencement	Permit Authorization	IPBI (Post 2024 Definition)	CP/ Prospectus Approval
Transition	2.540	2.540	-	-	2.54	2.54	-	2.54	-	2.54	2.54	2.54	2.54	2.54
2012	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2013	1.900	1.900	-	-	1.90	1.90	-	1.90	-	1.90	1.90	1.90	1.90	1.90
2014	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	0.723	0.723	-	-	0.72	0.72	-	0.72	-	0.72	0.72	0.72	0.72	0.72
2016	16.300	16.300	-	-	16.30	16.30	-	16.30	-	16.30	16.30	16.30	16.30	16.30
2017	2.800	2.800	-	-	2.80	2.80	-	2.80	-	2.80	2.80	2.80	2.80	2.80
2017	14.400	14.400	-	-	14.40	14.40	-	14.40	-	14.40	14.40	14.40	14.40	14.40
2018	1.400	1.400	-	-	1.40	1.40	-	1.40	-	1.40	1.40	1.40	1.40	1.40
2018	2.100	2.100	-	-	2.10	2.10	-	2.10	-	2.10	2.10	2.10	2.10	2.10
2019	3.900	3.900	-	-	3.90	3.90	-	3.90	-	3.90	3.90	3.90	3.90	3.90
2020	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	0.400	0.400	-	-	0.40	0.40	-	0.40	-	0.40	0.40	0.40	0.40	0.40
2021	35.100	35.100	-	-	28.54	35.10	-	21.84	-	35.10	28.54	35.10	28.54	35.10
2022	28.600	28.600	-	-	-	28.60	-	-	-	28.60	-	28.60	-	28.60
2022	1.300	1.300	-	-	-	1.30	-	-	-	1.30	-	1.30	-	1.30
2023	11.900	11.900	-	-	-	11.90	-	-	-	11.90	-	11.90	-	11.90
2024	4.600	4.600	-	-	-	4.60	-	-	-	4.60	-	4.60	-	4.60
Future		95.573	-	-	4.24	95.57	-	-	-	95.57	-	33.64	-	95.57
Total	127.963	223.536	-	-	79.24	223.54	-	68.30	-	223.54	75.00	161.60	75.00	223.54

Appendix G (continued), Salt River Service Area Page 3: Histogram style comparison for 3 years of project/credits by procedural milestone.

Salt River Service Area

Stream

Year	Credits Sold	All Projects
Transition	3,883.00	3,883.00
2012	1,338.15	1,338.15
2013	4,928.00	4,928.00
2014	5,607.09	5,607.09
2015	7,968.80	7,968.80
2016	3,968.00	3,968.00
2017	-	-
2017	83,154.00	83,154.00
2018	72.00	72.00
2018	11,225.00	11,225.00
2019	231.00	231.00
2020	90.00	90.00
2020	7,102.00	7,102.00
2021	-	-
2022	2,737.00	2,737.00
2022	2,696.00	2,696.00
2023	3,385.00	3,385.00
2024	9,859.00	9,859.00
Future		124,010.46
Total	148,244.04	272,254.50

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
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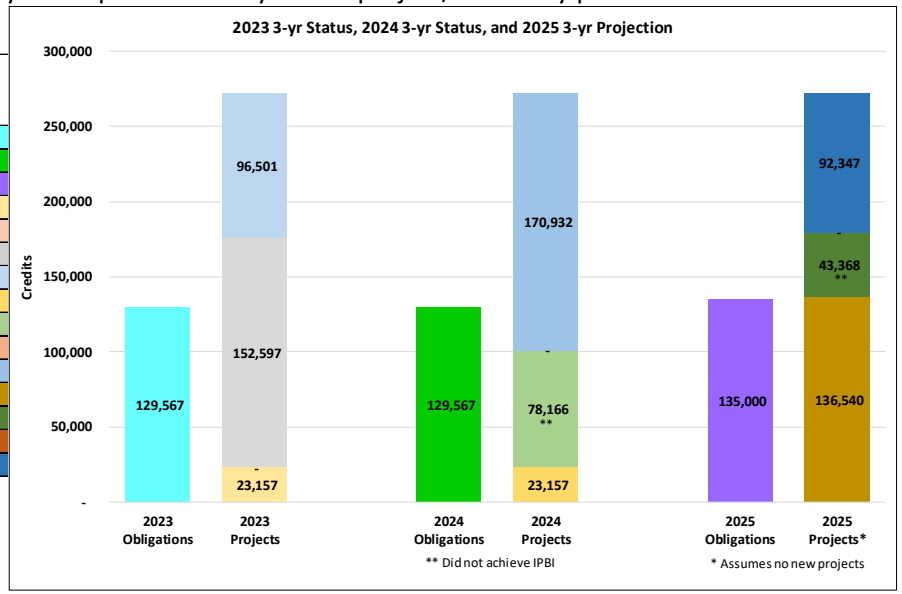
2024 CP/Prospectus Approved
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Wetland

Year	Credits Sold	All Projects
Transition	2.540	2.540
2012	-	-
2013	1.900	1.900
2014	-	-
2015	0.723	0.723
2016	16.300	16.300
2017	2.800	2.800
2017	14.400	14.400
2018	1.400	1.400
2018	2.100	2.100
2019	3.900	3.900
2020	-	-
2020	0.400	0.400
2021	35.100	35.100
2022	28.600	28.600
2022	1.300	1.300
2023	11.900	11.900
2024	4.600	4.600
Future		95.573
Total	127.963	223.536

Histogram Legend
2023 Obligations
2024 Obligations
2025 Obligations
2023 Construction Commenced
2023 IPBI (Post 2024 Definition)
2023 IPBI (Pre 2024 Definition)
2023 CP/Prospectus Approved
2024 Construction Commenced
2024 Permit Authorized
2024 IPBI (Post 2024 Definition)
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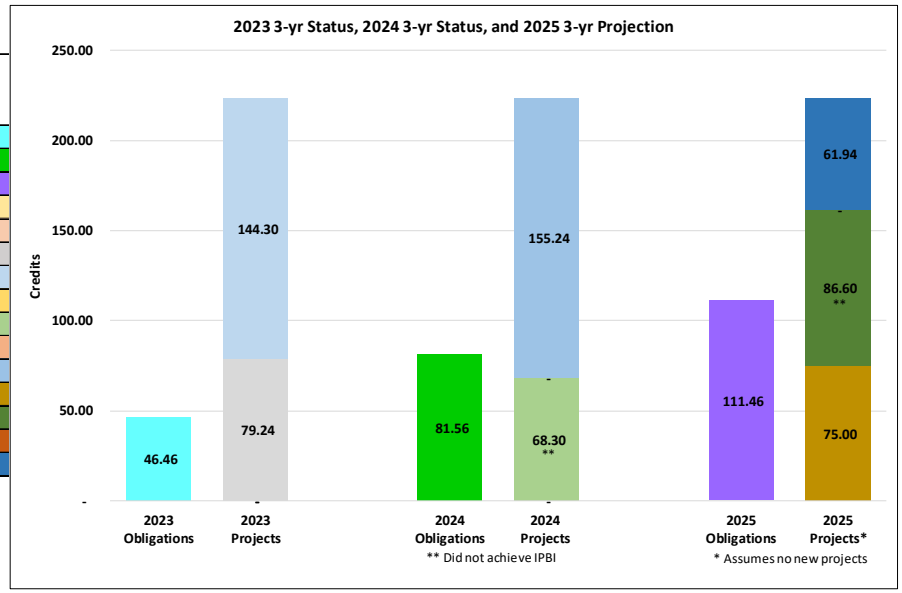
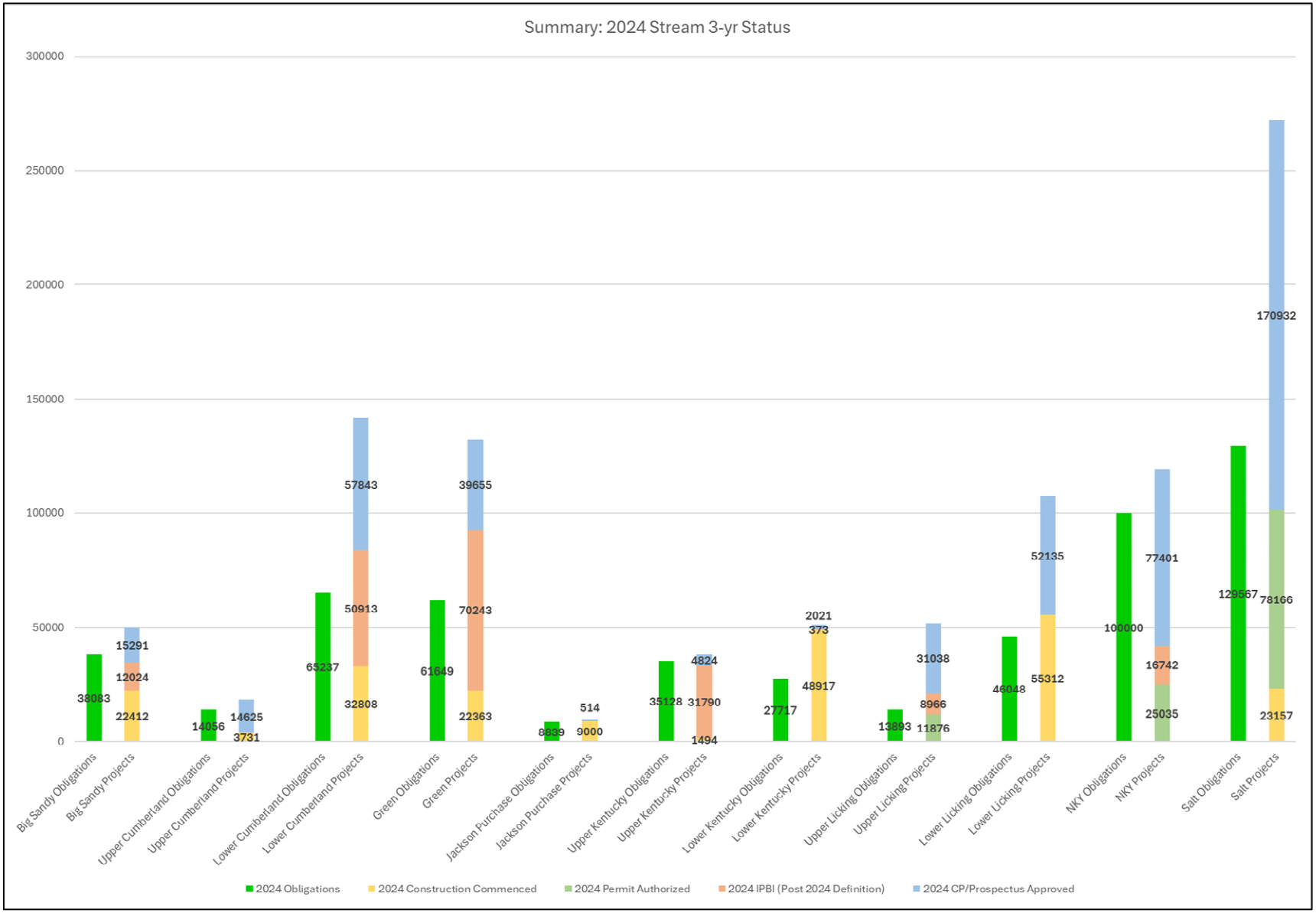
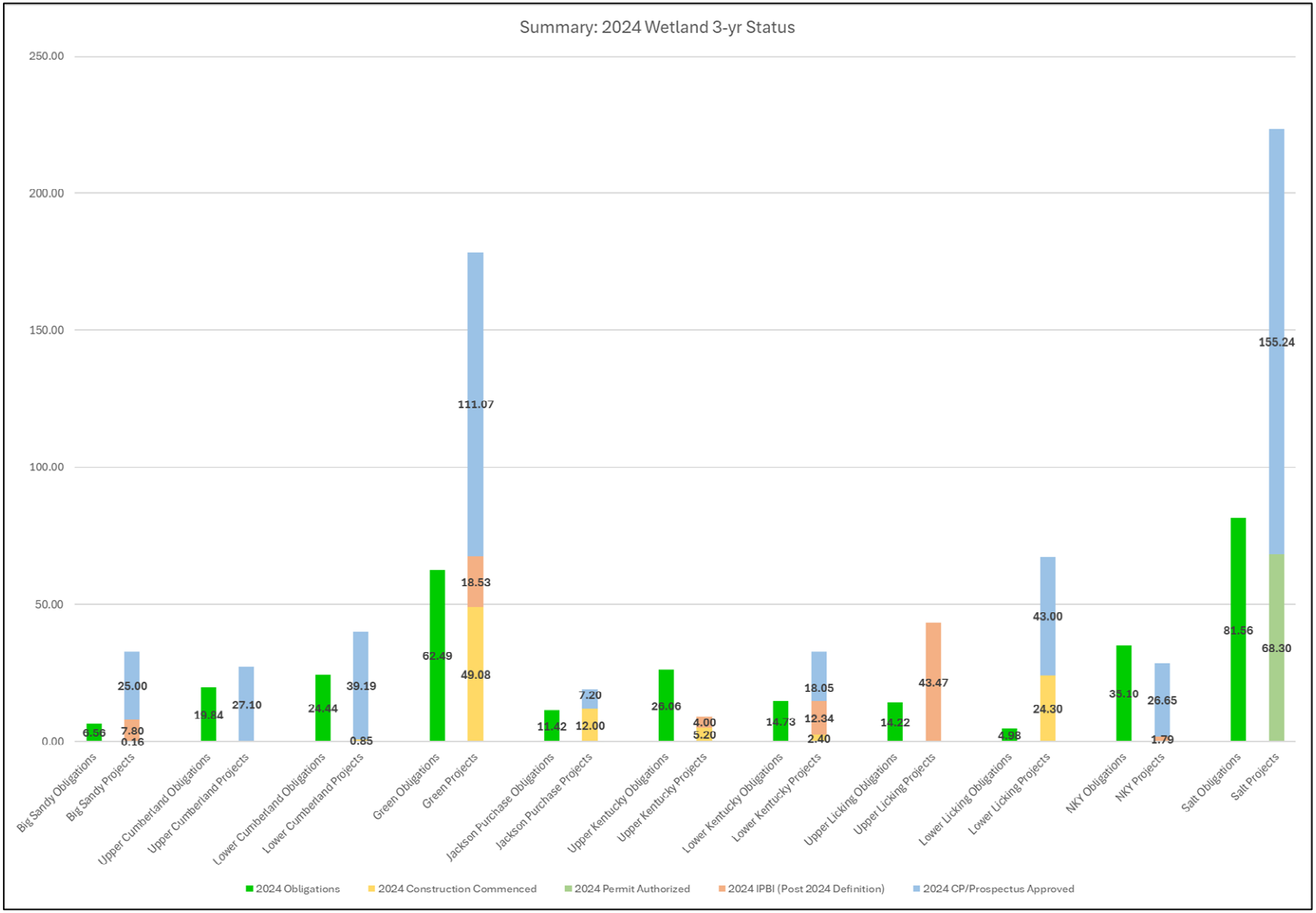
2025 Construction Commencement
2025 Permit Authorization
2025 IPBI (Post 2024 Definition)
2025 CP/Prospectus Approval



Appendix G (continued): Stream credit histogram summary, 2024 only, all service areas.



Appendix G (continued): Wetland credit histogram summary, 2024 only, all service areas.



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