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1. INTRODUCTION

The Bank Sponsor proposes to establish an umbrella mitigation bank (the “Bank”) to provide off-site compensation for the unavoidable loss of waters of the United States and their functions as a result of impacts within the proposed bank’s Geographic Service Area (GSA). The Bank, known as the Roanoke Umbrella Mitigation Bank at Camp Alta Mons (RUMB-CAM), contains approximately 875 acres including portions along the South Fork of the Roanoke River, Purgatory Creek, and an unnamed tributary of Purgatory Creek. The Bank is located in Montgomery County near Shawsville, Virginia (Figure 1). The primary GSA (Figure 2) of the proposed bank is defined by the hydrologic unit code (HUC) 03010101 and encompasses portions of the Upper Roanoke River drainage. The primary GSA is located within the Ridge and Valley physiographic province. Secondary GSA’s of the proposed bank include all sub-basins within the Roanoke River drainage that lie adjacent to the primary GSA (03010101) and include the Middle Roanoke River (03010102), the Upper Dan River (03010103), and the Banister River (03010105). This proposed service area would include all or portions of the counties of Montgomery, Roanoke, Bedford, Franklin, Floyd, Patrick, Henry, Pittsylvania, Halifax, Mecklenburg, Charlotte, Appomattox, and Campbell.

A Mitigation Banking Instrument (MBI) will be developed by the sponsor to establish the Bank. The MBI will contain the Site Development Plan (SDP) and will include site vicinity maps, summary of existing conditions found at the Roanoke Umbrella Mitigation Bank at Camp Alta Mons, mitigation design for the property including figures, monitoring plan, success criteria, a timetable for implementation and completion, and deed restrictions. The MBI and the Bank will be developed and operated in accordance with the Code of Virginia §33.1-223.2.1 Wetland Banking; and “Compensation Mitigation for Losses of Aquatic Resources”, Federal Register, 40 CFR, Part 230, dated April 10, 2008.

The Bank is being developed to provide a mitigation option for projects located within the Bank’s primary and secondary GSA’s that require compensation for unavoidable impacts to jurisdictional waters of the U.S. Currently, no stream specific mitigation banks exist within the GSA’s serviced by this proposed mitigation bank. The goals and objectives of the Roanoke Umbrella Mitigation Bank at Camp Alta Mons will focus on preserving and enhancing important ecological relationships between the proposed mitigation streams and the adjacent riparian and upland buffers. Along all the existing open space areas (approximately 40 acres) the RUMB-CAM site will be enhanced with heavy planting (400

stems/acre) of native trees and shrubs, invasive species removal will be accomplished (Tree of Heaven and multi-flora rose have been identified); and additional in-fill plantings (light planting) of native species will occur in all other areas of need within the 300' buffers. The newly planted riparian buffers will complete the reforestation of current open pasture and manicured grass areas. These additional buffers will provide increased shading to the waterways (Roanoke River and Purgatory Creek), will reduce sediment and nutrient run-off and will also provide continued benefits to the re-establishment of brook trout in Purgatory Creek and the survival of the Roanoke Logperch and Orange-fin Madtom in the Roanoke River. Mitigation at the Camp Alta Mons site will focus on the preservation of up to 300' riparian buffers (approximately 110 total acres), planting of up to 300' of new riparian buffers (approximately 40 total acres), and removal of existing invasive species found within the proposed mitigation areas. All native species to be planted will be located within the 100 year floodplain of Purgatory Creek and the Roanoke River. Consequently, mitigation design will focus on selecting plant species that are adaptable to these circumstances. Stream restoration is not proposed at the Camp Alta Mons site. As a result, water rights do not affect the overall design or success of the proposed mitigation bank at Camp Alta Mons.

2. EXISTING SITE CONDITIONS

2.1. Property Description

The Roanoke Umbrella Mitigation Bank at Camp Alta Mons (RUMB-CAM) is located on an 875-acre property that serves as the site for a long running and successful Christian camp and outdoor educational facility for the Roanoke District of the United Methodist Church. The site is located at 37.0992°N and 80.2498°W, at the intersection of Alleghany Springs Road and Crockett Springs Road. The site contains an access road, camp facilities; ropes challenge course, primitive camping, rustic lodging, RV camping, hiking trails, and horse riding facilities. The RUMB-CAM site also contains a mixture of open fields, forested uplands, submerged aquatic vegetation, emergent wetlands, and forested wetlands.

2.2. Topography

The proposed mitigation site is displayed on both the Pilot and Check, Virginia, United States Geological Survey (USGS) 7.5-minute topographic quadrangle maps (Figure 1). The 875-acre property contains a mixture of level, rolling, and steep topography with numerous intermittent and perennial streams. There are many areas of high relief

throughout the site that feature high gradient jurisdictional streams. Additionally, a valley runs through the center of the site and contains level to rolling topography. Purgatory Creek enters the site in an area of high relief and flows downstream to the valley floor. Purgatory Creek then flows through the valley before joining the South Fork of the Roanoke River. The section of property which contains the South Fork of the Roanoke River is a mostly level, floodplain area. The RUMB-CAM site topography contains elevations ranging from approximately 2200 feet above mean sea level (AMSL) in the areas of highest relief near the southwest portion of the property to approximately 1450 feet AMSL where Purgatory Creek joins the South Fork of the Roanoke River in the northeast corner of the site.

2.3. Jurisdictional Waters

The RUMB-CAM site contains numerous jurisdictional streams, as well as the South Fork of the Roanoke River. Three jurisdictional waters of the U.S. are included in this prospectus and include Purgatory Creek, an unnamed tributary of Purgatory Creek, and the South Fork of the Roanoke River. The South Fork of the Roanoke River flows through the northeast portion of the mitigation site for approximately 2200 linear feet. The riparian buffers in this reach transition from maintained grass/herbaceous to forested. A large emergent wetland, including submerged aquatic vegetation, occupies the area near the confluence of Purgatory Creek and the South Fork of the Roanoke River. Purgatory Creek, a high gradient perennial stream, enters the property from the southwest and spans the entire property for a distance of approximately 12,000 linear feet before joining the South Fork of the Roanoke River. The riparian buffer along Purgatory Creek changes from maintained grass to mature forest. A large forested wetland is located approximately halfway into the site along Purgatory Creek. An unnamed tributary of Purgatory Creek, also a high gradient stream, enters the property from the southwest and flows for approximately 4000 linear feet before joining Purgatory Creek. A total of approximately 18,200 linear feet of stream are proposed for the RUMB-CAM.

2.4. Presence of Threatened and Endangered Species

The Camp Alta Mons site was researched for the presence of threatened or endangered species that may be present in and around the proposed mitigation site. The Virginia Fish and Wildlife Information Service (VAFWIS) database was utilized for this report. To summarize the report, there are no threatened or endangered species found in Purgatory Creek, or streams flowing into Purgatory Creek located above the confluence. The VAFWIS database shows that the South Fork of the Roanoke River has the Roanoke Logperch

(*Percina rex*) listed as a state and federally endangered species. Additionally, the Orangefin Madtom is a state threatened aquatic species found within the Roanoke River system. Finally, the Indiana Bat (*Myotis sodalis*) is listed as a state and federally endangered upland species for this area.

3. ESTABLISHMENT AND USE OF CREDITS

An evaluation of the credit analysis will be performed by the IRT to determine the exact number of credits the ownership can expect as a result of bringing this proposed bank on-line. A conceptual site development plan (SDP) will be prepared and submitted to the IRT for review. The final calculation of the anticipated credits generated, as a result of the proposed RUMB-CAM site, will be determined by the IRT based upon final approval of the SDP. The mitigation credits will be made available in accordance with current guidance published by the COE and DEQ. However, a preliminary analysis of the Unified Stream Methodology (USM) determined the site would generate a minimum of 5055 stream preservation/enhancement credits; and up to 1820 endangered species credits for the streams currently included in this prospectus.

Disclaimer

The MBI will not supersede or alter the statutory authorities and responsibilities, regulations, policies, and guidance of the signatory agencies or any other group.

4. ESTABLISHMENT OF THE BANK

4.1. Mitigation Banking Instrument (MBI)

The MBI and the development and operation of the Bank will be in accordance with the most current version of the Mitigation Banking Template provided by the Norfolk District, Corps of Engineers; as well as the “Compensation Mitigation for Losses of Aquatic Resources”, Federal Register, 40 CFR, Part 230, dated April 10, 2008.

Camp Alta Mons, Inc. proposes the Bank will be managed by Blue Ridge Land Preservation Group. This entity will be responsible for annual management and operations of the proposed bank; with the owners of BRLPG having reviewed, assisted and/or designed numerous stream enhancement projects over the past 10 years. Camp Alta Mons, Inc. proposes preservation and enhancement of riparian systems and associated stream corridors and wetlands, specifically for the purpose of generating compensation credits. Camp Alta Mons, Inc. and Blue Ridge Land Preservation Group will provide for the long

term preservation and management of the proposed RUMB-CAM.

4.2. Permits

Blue Ridge Land Preservation Group, on behalf of the Camp Alta Mons, Inc. will obtain all documentation, permits and other authorizations required to establish and maintain the RUMB-CAM.

4.3. Bank Development Plan

Blue Ridge Land Preservation Group on behalf of Camp Alta Mons, Inc. will prepare an MBI that will represent the framework for the proposed RUMB-CAM. The proposed bank will be included in the MBI and developed conceptually and in final form through the site development plan (SDP). This documentation will be submitted and presented to the MBRT for review and approval. Development of the proposed site will be initiated with the submission of the conceptual SDP for the IRT to evaluate. Upon receiving a conceptual approval by the IRT, Blue Ridge Land Preservation Group will proceed with the preparations for the development of the final SDP. As with the conceptual SDP, the final documentation will also be forwarded to the IRT for review and approval. Upon receiving final approval of the SDP from the MBRT, the documentation will be included as an Addendum to the MBI. As a result, the proposed mitigation bank site will then be deemed a component of the MBI. Fifteen (15) percent of the credits may then be released consistent with the schedule of credit availability in accordance with the final SDP. An approved bank site, or an approved phase of the bank site, may be left undeveloped if no pre-sale or other credits have been debited for the site in the event the final SDP is not approved, the IRT will provide Camp Alta Mons, Inc. with specified reasons for not approving the submittal. Furthermore, Blue Ridge Land Preservation Group may then resubmit a revised final SDP with the specific modifications and/or justifications that address the MBRT concerns.

4.4. Financial Assurances Requirements

Camp Alta Mons will provide financial assurances for the proposed RUMB-CAM as part of the individual SDP acceptance forms of financial assurance that will be established in the MBI.

4.5. Real Estate Provisions

Camp Alta Mons, Inc. will record a restrictive covenant easement, or similar maintenance agreement with regards to the proposed bank. This agreement may also be

transferable to an acceptable conservation organization upon fulfillment of project objectives with proposed RUMB-CAM ownership remaining with the titled owner. Camp Alta Mons, Inc. will provide the perpetual protection and preservation of the proposed bank site through maintenance agreements, restrictive covenants, and/or conservation easements. These provisions will conform to current Norfolk District Corps of Engineers guidance with language allowing road easements, road/bridge crossings, hiking paths and trails, and other activities. Each real estate instrument used must be approved by the IRT.

5. OPERATION OF THE BANK

5.1. Service Area

The primary geographic service area (GSA) for the proposed RUMB-CAM includes Hydrologic Unit Codes (HUCs) for the Roanoke River watershed including all or a portion of the following counties: Montgomery, Roanoke, Bedford, Franklin, Floyd, Patrick, Henry, Pittsylvania, Halifax, Mecklenburg, Charlotte, Appomattox, and Campbell. The primary GSA for the Bank is the Upper Roanoke (03010101). The secondary GSA includes hydrologic unit codes 03010102, 03010103, and 03010105.

5.2. Conditions on Debiting (Credit Availability and Accounting Procedures)

Blue Ridge Land Preservation Group, on behalf of Camp Alta Mons, Inc. will establish and maintain a banking ledger which documents credits and debits to the proposed RUMB-CAM account. Each time an approved debit/credit transaction occurs, Blue Ridge Land Preservation Group will submit a statement to the permitting agencies. BRLPG will also generate an annual ledger report to be submitted to all members of the IRT. The ledger will be available for inspection upon written request by any of the participating agencies.

5.3. Use of Credits

The following types of projects may be eligible to use available credits offered by RUMB-CAM:

1. All activities regulated under Section 10 of the Rivers and Harbors Act, Section 404 of the Clean Water Act (CWA) and/or Virginia Water Protection Permit Regulations (9 VAC 25-210) located within the primary GSA of the stream and wetland bank may be eligible to use the URB-CAM as compensatory mitigation for unavoidable impacts.

2. Credits may be used to compensate for environmental impacts under other programs (civil works, Superfund removal and remedial activity, supplemental environmental projects for Federal and State enforcement actions, etc.).

3. For projects in the GSA that require authorization with a Nationwide Permit (NWP) under Section 404 of the CWA and/or Section 10 of the Rivers and Harbors Act, Norfolk District State Program General Permit (SPGP), and/or a Virginia Water Protection Permit, and that require compensatory mitigation. Credits from the RMB-CAM may be used to satisfy these compensatory mitigation requirements if the Bank ownership and the third party permittee reach a mutually acceptable financial agreement that is subject to regulatory approval on a case by case basis.

4. For projects located in the primary GSA that require authorization with an Individual Permit (IP) under section 404 of the CWA and/or Section 10 of the Rivers and Harbors Act and/or Virginia Water Protection Permit, the COE and DEQ, in consultation with the other regulatory and resource agencies, will determine the eligibility of such projects to use the RUMB-CAM on a case by case basis. Once the COE and/or DEQ have determined that mitigation in the RUMB-CAM is ecologically preferable to any on-site alternatives, or that there are no practicable on-site alternatives, mitigation may be provided by the use of mitigation credits for the RUMB-CAM as determined by the COE and/or DEQ for each agency's respective permits if the bank ownership and the third party permittee reach a mutually acceptable financial agreement.

6. MAINTENANCE AND MONITORING OF THE BANK

6.1. Maintenance, Monitoring, & Success Criteria

Prior to the release of credits, Camp Alta Mons, Inc. will provide appropriate financial assurance acceptable to the IRT in accordance with the terms of the MBI and the final SDP. The financial requirements will be reduced over time as the SPD is implemented. Blue Ridge Land Preservation Group will ensure all monitoring and maintenance costs will be undertaken during the success criteria time period. BRLPG will provide maintenance and monitoring in accordance within the terms and conditions outlined in the MBI and SDP. Monitoring will include data collection for the indicators of success specified for the site. Monitoring reports will be submitted to the IRT according to the schedule set forth in the SDP and will be used to evaluate site performance relative to the performance established

in the SDP. Remedial actions to the Bank site may be necessary during operational life of the bank. If Blue Ridge Land Preservation Group has followed the SDP but performance criteria are not being met, the MBRT will assist in the development of measures to meet performance criteria while holding additional cost to a minimum.

6.2. Long Term Protection

Consistent with the conditions of the MBI, a maintenance agreement, conservation easement or declaration of restrictive covenants will be recorded prior to the sale of any credits to assure preservation of these lands in perpetuity. Copies of documents of long term protection measures will be included in the SDP. The approved and debited credits in the proposed RUMB-CAM site will be retained in perpetuity by Camp Alta Mons, Inc. Decisions concerning the operational life of the proposed mitigation bank, long-term monitoring/management, remedial actions, and financial assurances will be made in accordance with the “Compensation Mitigation for Losses of Aquatic Resources”, Federal Register, 40 CFR, Part 230, dated April 10, 2008. These decisions will be agreed upon in the final RUMB-CAM SDP signed by the ownership, bank management, and the participating parties.

7. RESPONSIBILITIES OF THE IRT

The IRT agrees to:

- A. Review and provide comments on conceptual and final SDP within 30 days of receipt.
- B. Review and provide comments on annual reports within 60 days of receipt.
- C. Review and provide comments on adaptive management plans and/or required remedial action plans within 60 days of receipt.

8. RESPONSIBILITIES OF THE SITE OWNERSHIP

Camp Alta Mons, Inc. agrees to:

- A. Establish and/or maintain RUMB-CAM site until :
 1. Credits have been exhausted and the debited RMB-CAM site has satisfied all the conditions stated in the approved SDP, or
 2. Banking activity is voluntarily terminated through written notice by Camp Alta Mons Inc. with approval of the IRT.

- B. Submit to the IRT an annual report describing the condition of the RUMB-CAM site in relation to the success criteria outlined in the final SDP, as well as relating the overall activity of the Roanoke Umbrella Mitigation Bank at Camp Alta Mons.
- C. Develop necessary adaptive management plans and/or implement appropriate remedial actions for the RUMB-CAM site in coordination with the IRT in the event the proposed mitigation site fails to achieve success as specified in the final SDP.