Permittee Responsible Mitigation Plan

(Wetland/Stream Mitigation Plan)

Proposed ALOFT Hotel Site
606 Old McGavock Pike

NASHVILLE, TENNESSEE 37214

Prepared for:

Tarun N. Surti
5928 Westheimer Drive
Brentwood, Tennessee 37207

tarunsurti@comcast.net
615 812 6164

Objective(s) of the onsite mitigation

Project Rationale:

608/Aloft Hotels LLC owns and is currently being developed for construction of a hotel. Due to the several restrictions and or hardships created by the shape of the lot, the ROW encroachment from the Highway Department on the lots along McGavock Pike, and the extreme narrowness of the lots, and the TVA 150' Public Utility Easement crossing the north end of the site near the project area, it is difficult to design a workable project on this site. We have made the building smaller reduced plans numerous times to the present layout which is currently 60% impervious and 40% grass/buffer/landscaped areas.

The project rational is that we need to mitigate the small wetland area centrally located in the proposed Hotel Project area as it is located in a narrow portion of the lot and must be dealt with to keep the integrity of a viable develop project intact. And since have been able to succussfully develop alternatives we can do so with no net loss of wetlands in the immediate area, but in fact we will have moe wetland area resulting because of our plan. We have already downsized the proposed development footprint multiple times in an attempt to make this project work. Mr Surti has made multiple mitigation drawings since our meeting in February which I will only refereence here but note to show our efforts to find a mitigation solution. The

current and proposed (PRMP) mitigiation plan is to provideoff-site wetland creation while also limited on-site creation and protection of the most valuable portion of the exisitngwetland where the flow comes to surface in the middle of area 2 shown in Figure 2 and which is referenced here to show the many options and segments we have taken into account to develop a comprehensive plan.

We have seccured a wetland bank to mitigiate the wetland resouce being reloacted per our project, but this did not replaced habitat in the immediate area and so was not considered the best altenative at this present time. Some limited on sitework per our plan here is also proposed.

We hired an environmental company with multiple environmental specialists to assist in evaluating the resource, defining it and offering alternatives to address this issue on this site for our project. Please see Ramboll Letter dated 4/8/16 attached and incorporated herein by reference.

Discuss Alternatives consdiered LID

In additionto the on and off site wetland we have reviewed and considered number of other alternatives such as using pervious pavement, possible use of cisterns, and or roof gardens, level Iand Level II bioretention, maintaining buffers, etc. Use of pervious pavement and roof gardens was looked at but not selected for use on this site due to the sub-par performance over time of the pavement. Also using a level II bioretention did more to improve water quality for the areas being treated than all the other alternative efforts combined on the LID Worksheet when evalauted in meeting with Metro Stormwater staff. For these reasons these alternatives were not the preferred ones chosen for this project. This considerations coupled with both the off site mitigation of the wetlands, and the on-site wetland mitigation being accomplished in this plan, allows us to be confident we will have an eco-friendly project of the high quality desired by TDEC, Metro, and our future hotel patrons; this is the desire of the developer's of this project as well.

In the end, we have decided to protect the most valuable portion of the resource on site by this plan; this plan coupled with off site mitigation (done due to the difficulty to get the needed wetland replacement on this site fully) will be a very good approach as we move the design of this project forward and work on constructable plans for the entire project. To get the desired depth of flow in the prooposed wetland area we have set the elevation to 440.0' which means the flow in the proposed 12" RCP will be the depth water when water is present in area 2 as proposed. Seed bearing topsoils and base soils from areas 2, 3 and 4 will be stockpiled on site and spread as needed and as described on the plan to created the proposed enlarged wetland area 2.

Baseline information (the delineation Rick Lockwood withRamboll Environ has been provided and is incoprorated herein by reference. This addressed some of the following:

- the source(s) of hydrology and how the water will stay in the mitigation area

- a work plan (covers species list, sequence of events, construction methods, grading plan)

- Monitoring and long-term requirements (reiterate performance standards should be met, that monitoring will occur annually for five years, site protection, etc.)

sequencing of events
the preserved and created mitigation area will be flagged before construction begins, Topsoil will be stockpiled in two piles as indicted on the attached plan; these are to be created at the beginning off the project right after the Metro approved precon meeting occurs when permission is first given to install the initial erosion control measures for the site. These will be accomplished by clearing and grubing the areas in parking area where 2,3 and 4 wetland areas will be disturbed and then stockpiled for reuse on the enlarge proposed wetland 2 area.

Wetland success criteria and requirements for this project will be:

- **Signs placed around the wetland mitigation** area that clearly indicate they are protected wetlands and that no disturbance is permitted

- The resultant mitigation plant community shall contain less than 5% aerial coverage of invasive exotic species and nuisance species such as fescue. Removal of these species should first be accomplished by hand.

- The wetland mitigation area shall be placed under a Notice of Land Use Restrictions document, conservation easement or similar restrictive legal document. Such document shall be submitted to the division prior to wetland impacts and mitigation construction.

- The primary success criteria for the monitoring of the wetland area will be the survival of at least 75% of the planted woody species or volunteer species at the end of the monitoring period. We plan to have Rick Lockwood of Ramboll Environ perform the required Monitoring services.

- Monitoring shall be conducted annually for five years.
- The mitigation wetland shall exhibit hydrology indicators as indicated in the applicable Regional Supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual.

- In the event the wetland mitigation fails, in the Commissioner's option, to produce sufficient credits to fully offset the impacts of the project on waters of the state, the permittee must compensate for the deficit. We feel strongly this plan will succeed as proposed and therefore that option would be unnecessary.

1/25/17

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