



## Request for Letters of Intent for Connecticut's In-Lieu Fee Program for Wetland and Stream Mitigation

April 2026

### Background

The National Audubon Society, Inc., through Audubon Connecticut, is the sponsor of the Connecticut In-Lieu Fee (ILF) Program for aquatic resource (i.e., wetland and watercourse) compensatory mitigation, required by Department of the Army authorizations. This program was established by the New England District, US Army Corps of Engineers and Audubon Connecticut on Aug. 21, 2013.

The Connecticut ILF Program for Wetland and Stream Mitigation has accrued funds available for the preservation, enhancement, restoration, and creation of wetland and watercourse resources and associated upland buffers in the State of Connecticut.

The program receives its funds from applicants who have applied for permits under the Corps' Regulatory process and agree to use the program for mitigation of impacts resulting from their approved work. After the applicant avoids and minimizes the impacts to the extent possible, the Corps may approve the use of the ILF Program by the applicant. The Corps then determines the number of credits the applicant will need to purchase. The fees for the ILF credits are paid by the permittee to Audubon Connecticut. These credit sales are tracked by service area (Connecticut River, Housatonic River, Thames River, South-central Coastal, Southeast Coastal, and Southwest Coastal; see Appendix A). **Funds generated via the sale of credits are made available, through a competitive grant process, to various Cooperating Entities seeking funding for wetland and/or watercourse preservation, enhancement, restoration, and creation projects.** Implementation of such projects to successful completion results in the "release of credits" – which means credits are then regenerated for future sales via the ILF Program.

Through this process of credit sales and releases, the CT ILF Program's purpose and goals are to:

- Provide an alternative to permittee-responsible compensatory mitigation that will effectively replace functions and values of aquatic resources lost through permitted impacts;
- Substantially increase the extent and quality of preservation, enhancement, restoration, and creation of natural resources over that which is typically achieved by permittee-responsible mitigation for activities that impact wetlands and/or watercourses, significant wildlife habitats, and other waters within Connecticut;
- Reduce the extent of cumulative adverse impacts on aquatic resources that are regulated by the Corps permit program, and provide applicants for permits from the Corps greater flexibility in compensating for adverse impacts to protected natural resources; and

- Achieve ecological success on a watershed basis by directing Audubon Connecticut ILF funds to natural resource types and functions that are appropriate to the geographic service area, and by integrating Audubon Connecticut ILF projects with other conservation activities whenever possible.

**Funds accrued via credit sales to date are now available to Cooperating Entities interested in wetland and/or watercourse preservation, enhancement, restoration, and creation via the Connecticut ILF Grant Program.** Response to this Request for Letters of Intent is the first step in the CT ILF Program Grant application process as described below.

### **Application Process**

As sponsor, Audubon Connecticut continues to administer a competitive grant funding program and is soliciting Letters of Intent (LOIs) for wetland and/or watercourse preservation, enhancement, restoration, and/or creation. To be eligible to receive Connecticut ILF Program funding, a project applicant must first submit an LOI.

### **Due Date**

All LOIs must be submitted online to Audubon Connecticut's agent at the following address: [azemba@landtechconsult.com](mailto:azemba@landtechconsult.com). **Submissions must be received by 5:00 pm EST on May 8<sup>th</sup>, 2026.**

A complete Letter of Intent is comprised of the following:

- 1) A Summary Form to outline the proposed project and determine if it meets the Connecticut ILF core requirements (a fillable form is provided in Appendix D); and
- 2) A parcel map with the parcel boundary depicted on an aerial photographic base and depicting a north scale, address, and centroid coordinates.

LOIs will be evaluated, and applicants will be notified by late July 2026 as to whether they will be invited to submit a Full Proposal\* for their project. For the complete timeline for the upcoming grant cycle, see Appendix B. For a listing of the funds available for award in each Service Area, see Appendix C.

*\*Note: Full Proposals will require more detailed information, including a Mitigation Plan in accordance with the federal Mitigation Rule (33 CFR332(c) (2)-(14) but not necessarily limited to project concept designs, where applicable.*

## **Review Process**

LOIs are screened by the U.S. Army Corps of Engineers and Audubon Connecticut. The Corps and Audubon Connecticut will then determine which submittals represent projects that are appropriate for compensatory mitigation. For those projects that are deemed appropriate, applicants will be invited to submit Full Proposals.

Invited Full Proposals are then evaluated by the Project Advisory Committee (PAC) composed of representatives of the Corps, the United States Environmental Protection Agency (EPA), the United States Fish and Wildlife Service (USFWS), the Connecticut Department of Energy and Environmental Protection (CTDEEP), Audubon Connecticut, and three other rotating members representing other non-governmental environmental organizations, academia, or both. Those highest scoring full proposals that meet or exceed applicable review criteria may be recommended by the PAC to the Inter-Agency Review Team (IRT), which makes final allocation decisions. The IRT is composed of members of the Corps, EPA, USFWS, National Marine Fisheries Service (NMFS), Natural Resource Conservation Service (NRCS), and CTDEEP.

Audubon Connecticut administers the review process and is responsible for ensuring that approved funds are awarded and that projects are executed.

## **Special Considerations**

While the Connecticut ILF Program process is designed to include a review and approval of prospective projects via a process like that of other state and federal grant programs, it remains a compensatory mitigation program that must comply with relevant state and federal regulations. As such, there are several aspects of this program that should be considered fully before a potential applicant submits a Letter of Intent:

- **Restoration and enhancement projects are strongly encouraged and will likely score and rank higher than preservation-only projects.** Protection is an expected component of a restoration and enhancement project. Audubon Connecticut adheres to the mitigation hierarchy utilized by the Corps under their regulatory program, in which mitigation projects are prioritized in the following order: Restoration, Enhancement, Preservation, and Creation.
- **For restoration and enhancement projects, consultation with qualified professionals is recommended.** To appropriately scope the feasibility of a project, to accurately estimate projects costs, and to design a successful restoration project, Audubon Connecticut recommends consultation with aquatic resource consultants, engineers, or other qualified restoration practitioners. Note: the costs for professionals to assist with the project can be included in the proposed project's budget.
- **Preservation projects are eligible for Connecticut ILF funding. However, preservation-only projects must meet the following criteria:**
  - The resources to be preserved provide important physical, chemical, or biological functions for the watershed;

- The resources to be preserved contribute significantly to the ecological sustainability of the watershed; and
- The resources are under threat of destruction or adverse modifications.

Preservation projects have a higher likelihood of success if the resources they are preserving are difficult to restore, enhance, or create. For example: Bogs, vernal pools, and tidal wetlands with adjacent uplands that could allow for marsh migration. Preservation projects must have resources that cannot readily be restored or enhanced; therefore they are of a reference condition.

Where preservation is used to provide compensatory mitigation, to the extent appropriate and practicable, the preservation shall be done in conjunction with aquatic resource restoration, establishment, and/or enhancement activities.

- **Invasive species management to protect aquatic resources is eligible for ILF funding as part of a project's long-term management costs but cannot be the sole objective for a project to be considered as restoration or enhancement.** Projects requesting ILF funds for invasive species management will be required to complete an Invasive Species Control Plan (ISCP) as part of their long-term management plan.
- **Most ILF-funded projects will need to be protected/conserved in perpetuity via a conservation restriction or conservation easement.** However, it may not be mandatory for specific projects. For instance, a stream mitigation project may have difficulty obtaining multiple easements across several properties, a conservation restriction or easement may not be required. Applicants awarded funds from the ILF Program are required to sign a Project Agreement and to record a notice of that agreement with the land records for the property where the funded project takes place. ILF funds may not be used to preserve property that is currently owned by a conservation entity or to reimburse the costs of prior acquisitions, but wetland and/or watercourse restoration on already-preserved lands (i.e., preserved for conservation in perpetuity, not just in a town's ownership) is encouraged. Conservation easements funded through the ILF Program must prohibit any activities that would adversely affect the protected natural resources.
- **Active property uses, including habitat management or recreational activities, must not compromise the ecological health or function of the natural resources that the proposal intends to protect.** Projects that contemplate habitat management, recreational activities, or other active property uses will be asked to describe these proposed activities in subsequent submissions should the applicant be invited to submit a Full Proposal. Where such activities would occur on the property would need to be indicated on a map, so their compatibility can be evaluated as part of the review process. Projects proposing less active management will generally be considered more competitive.

- **Connecticut ILF Program funds could be eligible to match federal funding sources.** According to the federal Mitigation Rule [33 CFR 332.3(j)(2)], “federally-funded aquatic resource restoration or conservation projects undertaken for purposes other than compensatory mitigation, such as the Wetlands Reserve Program (NRCS), Conservation Reserve Program (NRCS), and Partners for Wildlife Program (USFWS), cannot be used for the purpose of generating compensatory mitigation credits.” Please follow up with the applicable agency if you are uncertain about the matching requirements for a particular grant program.
- **All projects will be required to develop a federal mitigation plan for IRT review and approval prior to project implementation.** Information on federal mitigation plan requirements is available on the USACE New England District Mitigation Webpage (<https://www.nae.usace.army.mil/Missions/Regulatory/Mitigation/>), including the District’s Compensatory Mitigation Standard Operating Procedures and Mitigation Rule (33 CFR 332.4(c)(2)-(c)(14)).

To discuss how any of these program elements may affect a potential project, or any other questions related to Connecticut ILF Program, please contact Anthony Zemba, Sr. Ecologist for LANDTECH Consultants via email at [azemba@landtechconsult.com](mailto:azemba@landtechconsult.com) or via telephone at (203) 454-2110 ext. 190.

**All interested applicants must use the attached Letter of Intent form (Appendix D).**

Additional information about the Connecticut ILF Program, including the Program Instrument (titled “*Final Instrument for the Audubon Connecticut In-Lieu Fee Program Sponsored by National Audubon Society, Inc.*”, dated August 21, 2013, and amended May 27, 2022), further instructions for completing the form and sources of additional information to assist in preparation of the form) can be found on Audubon Connecticut’s website:

[Wetland Mitigation and Connecticut’s In Lieu Fee Program | Audubon](#)

**APPENDIX A**

MAP OF CONNECTICUT ILF PROGRAM SERVICE AREAS

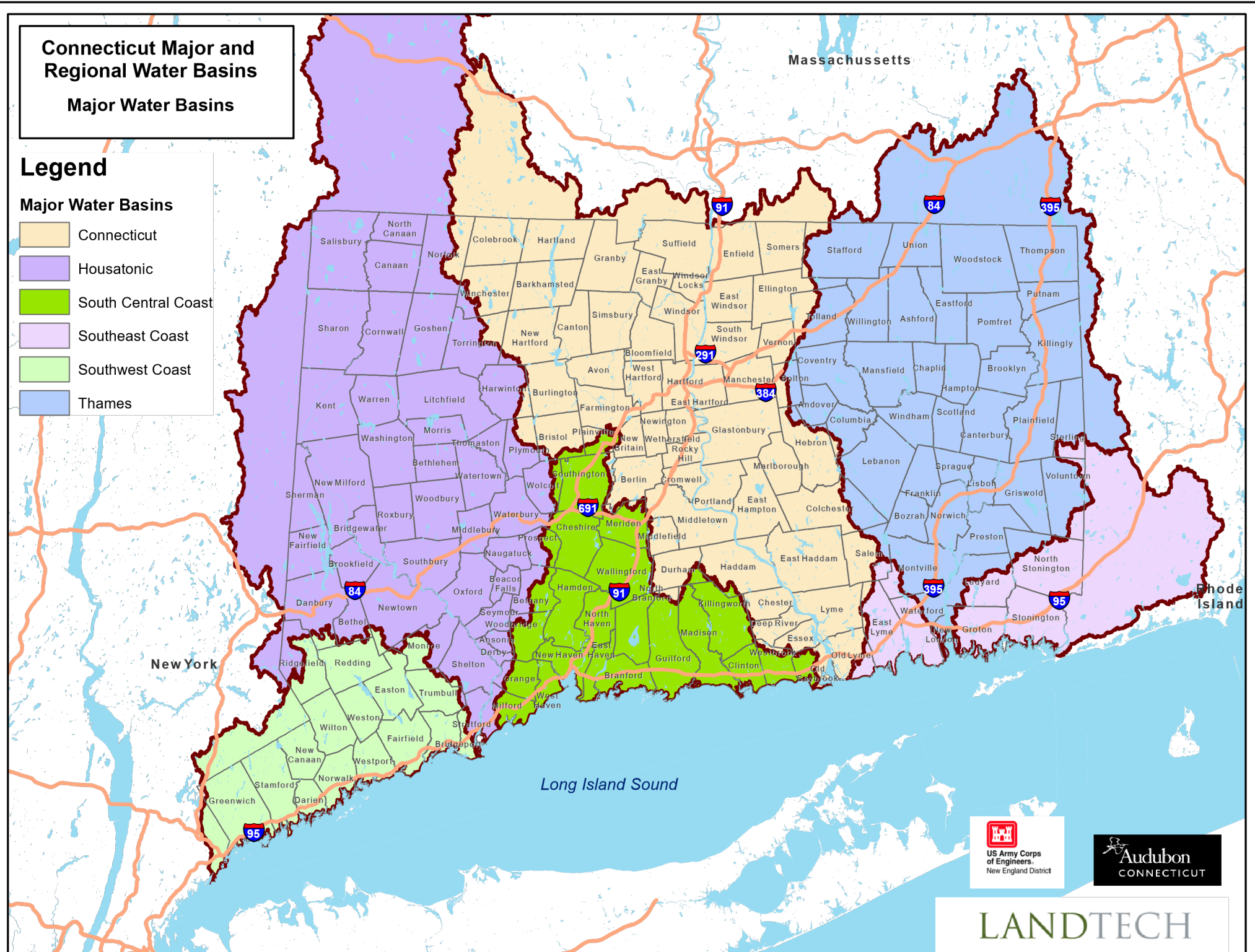
# Connecticut Major and Regional Water Basins

## Major Water Basins

### Legend

#### Major Water Basins

- Connecticut
- Housatonic
- South Central Coast
- Southeast Coast
- Southwest Coast
- Thames



## APPENDIX B

### CONNECTICUT ILF PROGRAM 2026 TENTATIVE SCHEDULE

STAGE	DEADLINE
Request for Letters of Intent (RFLOI) Released	Early April 2026
<b>Letters of Intent Submission Deadline</b>	<b>Friday, May 8<sup>th</sup></b>
Select Applicant Site Visits	Mid-June 2026
Select Applicant Requests for Full Proposals	Mid-July 2026
<b>Full Proposal Submission Deadline</b>	<b>Friday, August 28<sup>th</sup></b>
PAC and IRT Full Proposal Review Period	September-October 2026
Notice of Approval Letter Sent to Select Projects	Early November 2026
Project Agreements Finalized	Late December

*Note: Dates are predicted estimates and may be adjusted or delayed as the process progresses throughout the calendar year.*

**APPENDIX C**

FUNDS AVAILABLE PER SERVICE AREA

(As of March 26, 2026)

SERVICE AREA	AVAILABLE FUNDING
Connecticut River	\$1,007,890
Housatonic River	\$0
South-central Coast	\$1,912,010
Southeast Coast	\$382,212
Southwest Coast	\$78,603
Thames River	\$638,253

**APPENDIX D**

CONNECTICUT ILF PROGRAM LETTER OF INTENT FILLABLE FORM



**Letters of Intent Fillable Form for  
Connecticut's In Lieu Fee Program for Wetland Mitigation  
2026 Program Year**

Application Date:

**1. Project Title:**

**2. Project Sponsor:**

Organization:

Phone:

Contact Name:

Email:

Address:

**3. Project Location:**

Town:

Watershed:

County:

Coordinates:

Service Area:

Address:

**4. Project Description (brief overview of project content, goals, and readiness):**

**5. Preliminary Estimated Project Cost:**

Total Project Cost:

ILF Fund Request:

Other Funding Sources:

**6. Priority of Project Site:**

Within or adjacent to an Audubon Priority Focus Area

Focus Area Name:

Within or adjacent to existing public or private conservation lands

Site Name:

Within or adjacent to other natural resource priority areas

Area Name:

Brief description:

Contains natural resources of significant value and/or rarity

Habitat/species:

**7. Types of Mitigation:**

**Project Acres**

**Wetland/Watercourse Type**

Restoration

Enhancement

Preservation

Creation

Upland Buffer

See “Instructions for Completing a Letter of Intent for Connecticut’s In Lieu Fee Program for Wetland Mitigation” document for more instructions on completing this form. Visit the Connecticut In Lieu Fee Program information page for more information on the program: <https://www.audubon.org/ct-ilf>

*Applicants may add additional sheets as needed for any of the above requested information. Label added sheets by their applicable section number above.*