

Everett Public Works

While there is, by definition, the requirement for offsets to exceed impacts, there is no guidance as to by how much. There needs to be some guidance as to what kind of multiplier should be used to address the inherent uncertainty involved with when proposed offsets will be implemented, type of offset, and how effective they might be. It appears to be left up to the planning group to decide "The degree to which the plan must exceed the minimum offset... along with any margin of error they choose to include."

(See bottom of page 12.)

The second paragraph on Page 27 states "The issue of uncertainty is particularly important." And it alludes to a "multiplier of project benefits to the projected impacts to account for offset uncertainty..." but there is no guideline provided. Then on Page 12 of the Technical Supplement, Section 1-D 4)b)states that uncertainties exist on several scales and says the "the magnitude of total planned offsets may need to be increased...in order increase likelihood that net offsets exceed impacts of withdrawals." But again there is no guidance.

I'd suggest providing some guidance similar to that used in wetland mitigation agreements wherein there are ratios (e.g. 2.0) which reflect different types of "offsets" vs. "impacts" and different ratios (e.g. 1.5) to reflect the time it might take to implement projects.