

MEMORANDUM

To:	Brad Medrud, City of Tumwater Warren Hendrickson, Port of Olympia
From:	Jared Haney Project Manager, ICF
Date:	March 9, 2026
Re:	Remaining Work, Schedule, and Budget for Completion of Bush Prairie HCP and NEPA

Purpose

This memorandum summarizes the remaining work required to complete the Bush Prairie Habitat Conservation Plan (HCP), complete associated NEPA/SEPA review, and secure issuance of the Incidental Take Permit. It references the attached updated schedule (Figure 1) and cost estimate (*BPHCP_CostEstimate_RemainingTasks_030626*) and identifies the funding required to complete the remaining phases of work.

The intent of this memorandum is to support City and Port discussions regarding authorization of additional budget necessary to carry the project through permit issuance.

Current Status

The City of Tumwater (City) and Port of Olympia (Port) are currently completing their red flag review of the Administrative Draft Bush Prairie HCP. ICF anticipates receiving limited red flag edits to the draft by the end of March and expects these comments to require approximately 2–3 weeks to incorporate prior to submitting the revised Administrative Draft HCP to USFWS in late March or early April.

Upon submission, USFWS will conduct a formal review of the Administrative Draft HCP. Following resolution of USFWS comments and preparation of a revised Administrative Draft deemed sufficient to initiate NEPA, the project will transition into the NEPA/SEPA phase.

Current Budget Status

As of January 31st, ICF's remaining Phase 4 budget for Task 2 (Complete HCP and NEPA/SEPA) is \$79,828.20. An unpaid invoice from EcoNorthwest for approximately \$20,000 related to the Oregon Spotted Frog fee analysis reduces the effective remaining Task 2 budget to \$59,828.20.

Based on current expenditures, the remaining Task 2 budget is expected to be fully expended by the end of March 2026.

Additional funds currently available under existing agreements include:

- Phase 3, Tasks 3-6 (Early Implementation Tasks): \$137,454.65
- Phase 4, Task 1 (Public Engagement): \$8,654.74
- **Total Available Funds:** \$146,109.39

Summary of Remaining Costs

The attached cost estimate spreadsheet (*BPHCP_RemainingTasks_CostEstimate_March2026.xlsm*) identifies the total remaining costs shown in Table 2 below.

Table 2. Summary of Remaining Project Costs.

Task	Total Cost
Task 1 – Continued Public Engagement	\$21,455
Task 2 – Complete HCP	\$101,934
Task 3 – Complete NEPA	\$316,329
Task 4 – Early Implementation	\$121,850
Other Direct Costs (Travel for meetings)	\$5,390
Total Remaining Work	\$566,958

Based on the total remaining cost of \$566,958.00 and the total available funds of \$146,109.39, the additional funding required to complete the HCP, NEPA/SEPA review, and early implementation tasks is **\$420,848.61**.

Descriptions of Remaining Tasks

The following sections summarize the scope and key assumptions associated with each remaining task reflected in the cost estimate.

Task 1. Continued Public Engagement

Task 1 includes continued stakeholder coordination and public engagement support necessary to advance the HCP and NEPA process through completion.

This task includes:

- Ongoing coordination with key stakeholders, USFWS, other agencies, and the public.
- Preparation for and participation in scheduled stakeholder meetings.
- Development of presentation materials and meeting summaries.
- Coordination with Cascadia to plan and execute in-person meetings.
- Follow-up documentation and response coordination following stakeholder discussions.

Cascadia will provide logistical and outreach support consistent with prior phases of the project.

Assumptions

- Engagement activities are limited to scheduled meetings and anticipated coordination events.
- No large-scale public controversy or additional public outreach campaigns beyond the planned NEPA public review process.
- Cascadia support remains consistent with prior scope and level of effort.

Task 2. Complete HCP

Task 2 includes completion of the Habitat Conservation Plan through preparation of a revised Administrative Draft that USFWS determines is sufficient to initiate NEPA.

The anticipated steps include:

- Finalization and submission of the Administrative Draft HCP to USFWS.
- Three-month USFWS review (including HCP team, Section 7 review, and Solicitor).
- Incorporation of USFWS comments and revision into revised Administrative Draft HCP.
- Ongoing coordination with USFWS to resolve comments and refine the document.
- Preparation of a Screencheck Draft HCP for agency-level refinement.

The outcome of Task 2 is a revised Administrative Draft HCP that USFWS determines is sufficiently complete to initiate NEPA. Public release of the HCP occurs only in conjunction with publication of the Draft EA under Task 3.

Assumptions:

- USFWS review of Administrative Draft HCP lasts approximately three months.

- Comments are anticipated to be minor to moderate in nature due to prior coordination.
- One additional agency-level screencheck review prior to NEPA initiation.
- WDFW review coordinated through USFWS.
- Two in-person coordination meetings with USFWS and/or stakeholders.
- Revisions do not require substantive restructuring of the conservation strategy.

Task 3. Complete NEPA/SEPA

NEPA is assumed to proceed under an Environmental Assessment (EA) pathway. USFWS ultimately determines the appropriate level of review. If USFWS determines that an Environmental Impact Statement (EIS) is required, schedule and cost would require refinement.

A 12-month EA timeline is assumed, consistent with federal review timelines and agency capacity.

Under this pathway, ICF will initiate NEPA following USFWS confirmation that the Administrative Draft HCP is sufficient to proceed. The NEPA effort will include development of the purpose and need statement and alternatives, preparation of an Administrative Draft EA, incorporation of agency comments, and preparation of a Draft EA for public release. Following publication, the project will move through public review, response to comments, preparation of a Final EA, and support for issuance of the decision document.

Public Review and HCP Integration

Consistent with federal practice, USFWS will publish the proposed HCP concurrently with the Draft EA. Public review therefore applies simultaneously to both documents.

The NEPA phase includes a 30-day public comment period (assumed under EA), preparation of written responses to public comments (assume 60 days), coordination with USFWS regarding any updates to the HCP resulting from comments, preparation of the Final EA, and support for the decision document. Any HCP refinements necessary as a result of the NEPA process are included under this task.

All public comment response efforts are included under Task 3 (Complete NEPA/SEPA). The HCP team will provide technical input as needed.

Assumptions

- EA-level NEPA pathway.
- Approximately 12 months from initiation to Final EA.
- 30-day public comment period.
- 60 days for preparation of responses to public comments.
- Federal Register publication timing may extend overall schedule.

- Public comments are anticipated to result primarily in clarification rather than substantive changes to the conservation strategy.
- If substantive changes to the HCP are required following public review, additional schedule and cost may be required.

Task 4. Early Implementation Tasks

Task 4 includes development of implementation tools and administrative systems to support the HCP following permit issuance, including:

- Development plans and code updates.
- Manuals, forms, and training materials.
- Administrative tracking systems.
- Habitat management and monitoring program frameworks.

These tasks may proceed in parallel with NEPA, subject to funding availability.

Schedule for Completion of Tasks

The anticipated schedule for completion of the remaining work is shown in Figure 1. The schedule reflects sequencing assumptions described above, including completion of the Administrative Draft HCP and USFWS review prior to initiation of NEPA, and concurrent public release of the Draft EA and proposed HCP. The timeline assumes an EA-level NEPA pathway and incorporates reasonable agency review durations, public comment periods, and document revision cycles. Early implementation activities are shown proceeding in parallel where feasible to maintain project momentum and support timely transition into implementation following permit issuance.

Figure 1. Proposed Schedule for Completion of Bush Prairie HCP

Task	2026												2027												2028											
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Task 1. Continued Public Engagement																																				
1.1 Plan and Prep for Stakeholder Meetings																																				
1.2 Conduct Meetings																																				
1.3 Meeting Follow up																																				
1.4 Stakeholder Outreach																																				
Task 2. Complete HCP																																				
2.1 HCP PM and Meetings																																				
2.2 Admin Draft HCP - Anticipated delivery to USFWS 3/15/2026																																				
2.3 Screencheck Public Draft - Anticipated delivery to USFWS September 2026																																				
2.4 Section 508 Compliance HCP																																				
2.5 Final Public Draft HCP																																				
Task 3. Complete NEPA/SEPA																																				
3.1 NEPA PM and Meetings																																				
3.2 NEPA Scope of Analysis																																				
3.3 Admin Draft EA																																				
3.4 Revised Admin Draft EA																																				
3.5 Public Draft EA																																				
3.6 Admin Final EA																																				
3.7 Revised Admin Final EA																																				
3.8 Public Final EA & Decision Document																																				
3.9 SEPA & Decision Document																																				
Task 4. Early Implementation Tasks																																				
4.1 Support Development and Updating Development Plans and Codes																																				
4.2 Support Development of Manuals, Forms, checklists, and Training Program																																				
4.3 Support Development of Administrative Systems to Support BPHCP																																				
4.4 Support Development of habitat Management Plan and Monitoring Program																																				

■ ICF Preparation
 ■ City/Port Review
 ■ Agency Review/Processing
 ■ Public Review

Conclusion

The remaining work to complete the Bush Prairie HCP, associated NEPA/SEPA review, and early implementation preparation is estimated at \$566,958.00 under the EA-level pathway described herein. This estimate reflects the sequencing, review durations, and public process assumptions outlined above and is consistent with current federal review timelines and agency capacity.

With remaining funds available under existing agreements, the additional funding required to complete all remaining work is \$420,848.61.

Upon confirmation of scope and funding, ICF is prepared to proceed in accordance with the schedule presented in Figure 1.