VI. Mitigation

The LOPD associated with the Proposed Action includes an area southeast of the Runway 33 end where structurally unsuitable riverbed material will be either compressed prior to the placing of new material (fill) or removed (dredged) from the Potomac River and replaced with fill structurally suitable for supporting the RSA.

Section 5.6.2.1 identifies the Proposed Action’s anticipated impacts on the Potomac River, classified as Waters of the United States. The Authority has proposed:

- To mitigate the placement of fill or a pier structure by purchasing credits from a mitigation bank whose service area includes the project site for the Proposed Action; and
- A mitigation ratio of 1:1 (1 acre-credit of mitigation per acre of footprint above the river bottom).

At a meeting on September 30, 2010 among the Baltimore District of the U.S. Army Corps of Engineers (ACE), the FAA, the Department of Environment of the District of Columbia and the Authority, other potential methods of mitigation were discussed, including shoreline erosion control projects within the District. The Baltimore District of the U.S. ACE will serve as the lead District for the U.S. ACE.

At a meeting on October 21, 2010 among the National Marine Fisheries Service (NMFS), the FAA and the Authority, an agreement was reached that the FAA would coordinate further consultation with NMFS during the review period for the Draft EA. The NMFS identified the American Shad, Herring, Alewife, White Perch, Yellow Perch, and American Eel as species of interest with respect to the potential impacts of the Proposed Action on habitat. The NMFS also identified the transient presence of the Shortnose Sturgeon during the spawning season. The FAA, with assistance from the Authority, will provide draft letters for Endangered Species Act consultation regarding the shortnose sturgeon and regarding Essential Fish Habitat (EFH) to NMFS.

During detailed future design of the Proposed Action (expected to occur in 2012), the Authority will apply for a Section 404 permit and will abide by the terms of the permit and accompanying water quality certifications. Because the Potomac River is navigable, a Section 10 permit under the Rivers and Harbors Act may be required from the U.S. ACE for land mass extension at the Runway 33 end. Permitting will occur during project design after the acres of fill required have been determined.

No vegetated wetlands regulated by the U.S. Army Corps of Engineers, Virginia Department of Environmental Quality, or Virginia Marine Resources Commission are located on Airport land within the LOPD.

With the exception of the impacts on Waters of the United States, the Proposed Action is not expected to cause significant impacts, itself or cumulatively, in any of the other environmental impact categories listed in FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures*, Appendix A, "Analysis of Environmental Impact Categories."

Sections III and 5.7 document that no practicable alternatives to the Proposed Action exist outside the 100-year floodplain. If no practicable alternative outside the base floodplain exists, Executive Order 11988 and DOT Order 5650.2 require the FAA to minimize action-induced impacts on the
base floodplain and, where practicable, to restore and preserve natural and beneficial floodplain values that would be adversely affected by the action. Section 5.7 documents the lack of beneficial and natural floodplain values within the LOPD and confirms that the Proposed Action would not cause discernible effects to flood storage or flow, adverse effects to human health or life, or adverse impacts to facilities or operations. The RSAs are fixed by function around each runway. Because significant portions of Runways 4-22 and 15-33 currently exist within the 100-year floodplain, there are no other practicable alternatives to avoiding an encroachment to the floodplain. Therefore, the Proposed Action constitutes the only practicable alternative. Mitigation measures are not necessary because there would be no potentially significant impacts and the impacts to the 100-year floodplain are indiscernible.