



US Army Corps
of Engineers
Alaska District

Special Public Notice

ANCHORAGE FIELD OFFICE
Regulatory Division (1145)
CEPOA-RD
1600 A Street, Suite 110
Anchorage, AK 99501-5146

**Notice of Availability of the Revised
Anchorage Debit/Credit Methodology**

PUBLIC NOTICE DATE: May 06, 2011

EXPIRATION DATE: June 27, 2011

REFERENCE NUMBER: POA-2009-829

The U.S. Army Corps of Engineers, Alaska District (Corps), the U.S. Environmental Protection Agency, Region 10, Alaska Operations Office (EPA), and the Municipality of Anchorage, Community Planning Department (MOA) jointly announce the publication of a draft revised Anchorage Debit/Credit Methodology (ADCM, April 2011). We are requesting comments and suggestions on the revision from those who have experience using the methodology.

The ADCM is a tool for providing a consistent approach to determining the appropriate amount of compensatory mitigation for unavoidable adverse impacts of development and other construction projects in waters of the U.S. It does so by providing a mathematical means of expressing adverse impacts as debits and beneficial impacts as credits. The procedures take into account various factors, such as:

- the pre- and post-project Relative Ecological Values (REVs) of the site and surrounding area;
- the nature and extent of disturbance already affecting the site and surrounding area;
- the extent, nature and permanence of anticipated direct and indirect adverse impacts;
- the type and extent of improvements in function expected to result from restoration, enhancement and creation/establishment projects; and,
- the extent of the threat of future development or other adverse impacts at proposed preservation sites.

The ADCM began in 1996, as part of the Corps' evaluation of a large-scale development proposal in an even larger Anchorage wetland complex. Both the proposed development and compensatory mitigation sites included areas ranging in function and value from high to low. Due to this heterogeneity, the initial agencies involved [i.e., the Corps, EPA, U.S. Fish and Wildlife Service (USFWS) and Municipality of Anchorage] concluded that project size and Anchorage Wetlands Management Plan (AWMP, 1996) designations were not sufficient factors for determining the appropriate extent of compensatory mitigation. That conclusion led to the ADCM's initial steps of delineating project sites in terms of REV, and considering development in higher value (i.e., "higher REV") areas to cause greater adverse impacts, and thus, to require more compensatory mitigation than development in lower value portions of the same site.

As the agencies, project proponents and their representatives have worked together over the years to apply and adapt the methodology to varying sites and projects, we arrived at the suite of considerations in the bulleted list above. Section II (Procedures) and Appendix A (Glossary) address the various factors in greater detail.

It is important to note that the ADCM applies only to the determination of the extent of compensatory mitigation necessary to offset the adverse impacts of a project and/or the extent of adverse impacts that a restoration, enhancement, establishment, or preservation project could offset. The methodology does not supplant, and in fact, plays no role in determining whether a project is contrary to the public interest, whether it incorporates all appropriate and practicable measures to avoid and minimize adverse impacts, or whether proposed compensatory mitigation measures represent an appropriate and practicable offset of the project's unavoidable adverse impacts. In other words, calculation of project debits and credits is not, in and of itself, sufficient to obtain project approval from the lead Federal regulatory agency (i.e., Corps or EPA) even if the number of credits equals or exceeds the calculated debits. As such it is inadvisable for project proponents to proceed with any but preliminary calculations or to make binding decisions based upon calculations until the Federal evaluation process has progressed far enough to provide a reasonable indication as to the extent of proposed work, if any, which is likely to receive approval.

Use of the ADCM is recommended, but not required. The ADCM provides a scientifically-supported technique to inform decisions on compensatory mitigation in a consistent, robust, repeatable, and defensible manner. It also provides a common technical framework for discussion of complex issues related to adverse impacts and compensatory mitigation. However, the existence of these procedures does not preclude the use of other tools for determining compensatory mitigation needs and project proponents are welcome to propose alternative means for quantitative comparison.

The public, particularly those with experience using the methodology, is invited to submit comments on the revised methodology. The main changes have been the addition of a detailed glossary of terms, revisions in how both indirect impact debits and in-stream debits and credits are calculated, and the addition of an accessibility factor to the assessment of threat level for preservation projects. Comments received will be considered during the finalization of this revision of the ADCM. Comments regarding the following specific topics would be especially useful:

- Problem situations encountered and possible approaches for addressing them
- Revisions to the REV & Threat Tables (Tables 1, 2, 10 and 11)
- Revisions of the in-stream debit/credit calculation procedures
- Revisions of the indirect impact calculation

The ADCM is present in its entirety on the internet at http://www.poa.usace.army.mil/reg/SPN_Scanned/ADCM-POA-2009-829.pdf

Written comments can be submitted to Mary Lee Plumb-Mentjes, Ph.D., Project Manager, Anchorage Field Office, U.S. Army Corps of Engineers, Alaska District, 1600 A Street, Anchorage, Alaska 99501-5146 or by e-mailing Mary.Plumb-Mentjes@usace.army.mil.

One-day training (8 a.m. to 4:30 p.m.) on use of the ADCM (this training will **not** include the GIS mapping portion of the ADCM) will be offered June 7 and 8, at the Anchorage Field Office, 1600 A Street, Suite 110. Participants must call 753-2789 prior to June 1 to enroll. The training is for small groups so space will be limited. Additional training opportunities, will be provided in the summer.

For additional information, contact the Corps, the EPA, or the MOA:

Mary Lee Plumb-Mentjes, Ph.D., Corps of Engineers, tel. 907-753-2789, Mary.Plumb-Mentjes@usace.army.mil.

Heather Dean, Environmental Protection Agency, tel. 907-271-3490, Dean.Heather@epa.gov.

Thede Tobish, tel. 907-343-7918, TobishTT@muni.org, or Karen Keesecker, tel. 907-343-7922, KeeseckerKM@muni.org, Municipality of Anchorage, Planning Department.

District Engineer
U.S. Army, Corps of Engineers