



US Army Corps  
of Engineers  
Alaska District

# Special Public Notice

USACE, Alaska District  
Regulatory Division (1145)  
CEPOA-RD-SS  
Post Office Box 6898  
JBER, Alaska 99506-0898

Issuance Date: August 7, 2017  
Expiration Date: September 6, 2017  
Identification No.: SPN-2009-829-2  
*(In reply, refer to above number)*

**PROPOSED  
ALTERNATIVE METHOD FOR CALCULATING AMOUNTS OF  
DEBITS FOR IMPACTS TO WATERS OF THE U.S, INCLUDING WETLANDS  
IN THE MUNICIPALITY OF ANCHORAGE FOR PROJECTS THAT ARE VERIFIED WITH  
NATIONWIDE PERMITS AND HAVE BEEN DETERMINED TO REQUIRE COMPENSATION**

Interested parties are hereby notified that the U.S. Army Corps of Engineers, Alaska District (Corps) is seeking comments on a proposal to modify the procedures used to determine the amount of compensatory mitigation required to offset unavoidable impacts to aquatic resources, for those projects requiring authorization under Section 404 of the Clean Water Act and qualifying for Nationwide Permit authorization. Currently, the Corps utilizes the Anchorage Debit Credit Methodology (ADCM) as the primary tool to quantify compensatory mitigation requirements within the political boundary of the Municipality of Anchorage. The intent of the proposed simplification of the ADCM (hereafter referred to as ADCM Lite) is to allow a rapid calculation of debits for projects that fit the terms and conditions of Nationwide Permits. Nationwide Permits only authorize projects that have minimal individual and cumulative impacts; therefore ADCM Lite is more commensurate to more quickly quantify aquatic resource impacts for smaller projects. ADCM would continue to be the method used to determine the amount of compensatory mitigation for projects with more than minimal impacts that require an individual permit from the Corps.

In all cases, compensation is only considered after avoidance and minimization measures for the project have been addressed. The determination of when compensatory mitigation is required will still be based on an evaluation of functional loss pursuant 33 CFR 330.1(e)(3). If compensatory mitigation is determined to be necessary, then application of the ADCM, ADCM Lite or another appropriate method to quantify debits would be applied; the calculation would not be the determining factor as to when compensation is required.

The proposed ADCM Lite method would still start with a delineation of the aquatic resources by Relative Ecological Value (REV) and use the adjustment factor (debit ratio) associated with the REV value of the aquatic resource. (Refer to Tables 1, 2 and 6 of the ADCM, 2011 revision for the REV landform classification and debit ratio which can be found at: [www.poa.usace.army.mil/Portals/34/docs/regulatory/specialpns/ADCM-POA-2009-829.pdf](http://www.poa.usace.army.mil/Portals/34/docs/regulatory/specialpns/ADCM-POA-2009-829.pdf)). The definitions associated with the REV polygon designations would still use the Glossary from the ADCM. The use of a debit ratio would be consistent with the Anchorage General Permits (POA-1993-10-M4, POA-1993-11-M4, POA-1993-12-M4). The Corps alone will determine if the full ADCM would be used, ADCM lite, or if an alternative method proposed by an applicant would be appropriate. These determinations will be made on a case-by-case basis.

The debit calculation would be equal to the ratio for the associated REV aquatic resource multiplied by the area of direct impacts to Waters of the U.S.

Steps proposed for the ADCM lite method of calculating debits\*:

1. Assemble the necessary materials and information as applicable (same as full ADCM):
  - a. Aerial photo/image of the site with waters of the U.S., including wetlands delineated on the image;
  - b. The plan/foot print of the proposed project with dimensions clearly indicated for the proposed direct permanent (any impact that would not be restored within 5 years of the start of construction) impacts to waters of the U.S.;
  - c. Dimensions (i.e. length and wetted perimeter) of any waterway that the project may affect in square feet; for non-waterways (i.e. wetlands, marine, etc.) the unit of measure to calculate impact is acres.
  - d. Multiply the area of the proposed impact by the debit ratio for the appropriate REV and water type.

Example: an authorized impact that has been determined to require compensation for 0.4-acre loss of REV 2 wetlands:  $0.4\text{-acre} \times 1.5 \text{ ac/debit} = 0.6 \text{ debits}$

\*please note the type of compensatory mitigation would still need to be determined appropriate by the Corps pursuant to 33 CFR 332.3(e).

ADCM lite will not be used:

- For calculation of credits;
- When the project is authorized with an Individual Permit, unless determined by the Corps to be acceptable and commensurate to impacts.

**COMMENT PERIOD:** Comments on the described proposal, with the reference number, should be made in writing and reach this office no later than the expiration date of this Special Public Notice to become part of the record and be considered in the decision.

You may view a copy of the request for comments under the listing SPN-2009-829-2 at [www.poa.usace.army.mil/Missions/Regulatory/Permits/SpecialPublicNotices](http://www.poa.usace.army.mil/Missions/Regulatory/Permits/SpecialPublicNotices).

Any questions or requests for additional information should be directed to:  
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