

6.0 IDENTIFICATION OF MITIGATION MEASURES

In accordance with CEQ guidance, dated January 14, 2011, Table 6-1 (Summary Table of Mitigation Measures) identifies the mitigation measures, as identified in Section 3.1.3, that VA will implement to reduce potential impacts below a level of significance. The table also identifies the anticipated benefit of the mitigation measure and how VA will implement and monitor the mitigation commitments. All other design, avoidance, and best practice measures will be implemented as part of construction and operation as described in this EA. VA has considered the long-term funding impacts of the EA mitigation measures listed below. VA is committed to implementing such measures and has mechanisms in place to seek adequate funding for the implementation of the mitigation measures.

Table 6-1: Summary Table of Mitigation Measures

Mitigation Measure BIO-1

Resource Effected	Northern Coastal Salt Marsh and Seasonal Wetlands Habitats
Description of Mitigation Measure	<p>To reduce the adverse impact (i.e., direct removal of, placement of fill into, or hydrological interruption of Federally protected wetlands resulting in a net loss) to the northern coastal salt marsh and seasonal wetlands habitat within the VA Development Area to less than significant, VA will implement Mitigation Measure BIO-1.</p> <p>Mitigation Measure BIO-1:</p> <p>The Proposed Action is within the USACE San Francisco District's San Francisco Bay Wetland Mitigation Bank (Bank). Nontidal/seasonal wetland and other waters within the service area may be eligible to use the Bank for mitigation on a case-by-case basis (i.e., for projects with impacts to nontidal/seasonal wetlands or other waters that may have been historic tidal wetlands or other waters). VA proposes a replacement ratio of 1:1 and shall consult with USACE to determine if a Bank, in-lieu fee, or permittee-responsible mitigation is the appropriate mitigation. Should mitigation credits be unavailable at the Bank to suit the needs of the project, VA shall seek out other methods to mitigate permanent impacts to nontidal/seasonal wetlands in consultation with the USACE.</p>
Anticipated Benefit	Compensating for an impact by replacing or providing substitute resources or environments
How it will be Implemented	The VA will undertake 404 permitting and 401 Certification prior to project construction phase in late 2014
Criteria for Evaluating	<p>A mitigation ratio of 1:1 has been identified in the Draft EA and will be adjusted, if necessary, based on ongoing consultation with USACE.</p> <p>Mitigation ratios are decided upon by USACE and discussions regarding suitable mitigation are currently underway. The VA and USACE will come to an agreement on mitigation in the future, before development proceeds.</p> <p>Location of replacement wetlands will also be determined in consultation with USACE. VA's preference is to replace wetlands acres in areas of the transfer parcel that are determined by the USACE as the best location to enhance and expand existing conditions (i.e., the area designated as on-site runway wetland). If the USACE determines that there are no acceptable mitigation sites on the transfer parcel, the VA will work with the USACE to address in-lieu fee or a "bank" option. Mitigation options are not required to be finalized for the EA, but rather before issuance of permits, prior to construction. The VA will coordinate with the BCDC as the location of mitigation sites and associated design requirements are further refined.</p>

Responsible Party	Prior to Navy to VA Federal-to-Federal land transfer and prior to commencement of construction activities; VA will hire a site “Program Manager” for the entire 624 acre parcel. The Program Manager is a permanent position with responsibility to ensure VA complies with all Mitigation Measures including wetland application, permitting, mitigation, and on-going wetland care taking.
-------------------	--

Estimated Completion Date	December 2013
---------------------------	---------------

Mitigation Measure BIO-2

Resource Effected	California Least Tern (CLT)
-------------------	-----------------------------

Description of Mitigation Measure	To reduce the adverse effects as described above, to the CLT to less than significant, VA will implement Mitigation Measure BIO-2 to minimize the potential for harm and harassment of the CLT resulting from the project related activities.
-----------------------------------	--

Mitigation Measure BIO-2:

To minimize potential adverse effects of VA’s Proposed Action, VA will implement specific avoidance and minimization measures, as identified in the 2012 USFWS BO (see Appendix B [Biological Resources Supporting Information]). The measures pertain to the Navy’s Fed-to-Fed transfer and VA’s subsequent construction and operation of the Proposed Action as described under Alternative 2 in this EA. The measures provide for the long-term conservation and management of the CLT, including implementing land use restrictions for long-term maintenance, management, and monitoring of the CLT. A summary of the avoidance and minimization measures that VA will implement include the following:

- The undeveloped portion of the VA Transfer Parcel will remain undeveloped, providing a buffer from human related activities, and will be managed in perpetuity for the long-term persistence and sustainability of the CLT colony.
- CLT management activities will continue at current levels or greater levels, as determined by an annual monitoring report. CLT colony management activities will include:
 - Vegetation control and weed removal within the undeveloped portions of the VA Transfer Parcel;
 - Maintenance of the fence surrounding the CLT colony;
 - Maintenance of the CLT colony and preparation for the breeding season by placement of appropriate substrates and other measures to enhance nesting habitat;
 - Breeding season monitoring of the CLT colony;
 - Management of feral cats and other terrestrial predators; and
 - Control of avian predators (e.g., gulls, corvids, and raptors).
- Preparation of a long-term monitoring and management plan and update as needed. The plan will be reviewed and approved by the USFWS.
- Preparation of a predator management plan to maintain protection from predator threats at current or lesser intensity. The plan will be reviewed and approved by the USFWS.
- VA will conduct an education program for all newly hired employees located at the VA Transfer Parcel.
- Lighting, including that for roads, building security, and public safety, will be designed to minimize nuisance nighttime light levels.
- VA will develop strategies to minimize erosion and introduction of pollutants into stormwater runoff according to RWQCB guidelines.
- VA will incorporate building and landscape design features to protect the CLT and its colony, including anti-perching features, limit the height of buildings,

structures, and landscape plantings and features, and installing a permanent barrier along the VA Development Area to prevent unauthorized access into of the undeveloped portion of the VA Transfer Parcel.

- During CLT breeding season, a qualified biological monitor will be present, during all construction activities, to ensure that no activities adversely affect CLT using the colony.
- During the non-breeding season, a qualified environmental inspector will be present on site regularly throughout the non-breeding season.
- All refuse storage will be stored in secure, covered containers, and emptied on a regular basis and all dumpsters will have lids and placed in roofed enclosures.
- Military honors salutes will be conducted at committal service shelters or the designated assembly area only, and be conducted in a manner that directs firing (i.e., rifles or other small arms only) away from the CLT colony. No artillery or explosives salutes will be permitted.
- The volume of carillon output would be limited to ensure that use does not increase ambient noise levels at the CLT colony by more than 10%.
- During CLT breeding season, memorial events, such as those held on Memorial Day, will be conducted at designated assembly areas or committal services shelters. Events will be organized, staged, and conducted to direct noises away from the CLT colony. The use of amplifiers or public address systems will be permitted only to the extent that they do not increase ambient noise levels at the site, as measured at the north end of the CLT colony.
- All construction vehicles and equipment for construction activities will use designated site access points and remain on designated construction routes.
- Stockpiling of materials that may provide additional shelter for potential CLT predators at the construction site will be kept to a minimum and inspected on a regular basis by the biological monitor.
- During the CLT breeding season, no materials or equipment will be brought on site during evening or nighttime hours (i.e., dusk to dawn).
- Pile driving and pavement demolition activities requiring impact tools are prohibited during the CLT breeding season. The use of other types of construction equipment that would not increase the ambient noise level at the site, as measured from the north end of the CLT colony, are permitted during the CLT breeding season.
- The tops of buildings under construction, including on-site trailers, will be inspected for avian predators once each week from April 1 to August 15.

The 2012 USFWS BO includes a complete and detailed list of the avoidance and minimization measures that VA will implement to minimize potential impacts to the CLT, see Appendix B (Biological Resources Supporting Information).

Anticipated Benefit

- Minimizing an impact by limiting the degree or magnitude of the action and its implementation.
- Reducing or eliminating an impact over time, through preservation and maintenance operations during the life of the action.

How it will be Implemented

Prior to Navy to VA Federal-to-Federal land transfer and prior to commencement of construction activities; VA will hire a site “Program Manager” for the entire 624 acre parcel. The Program Manager is a permanent position with responsibility to ensure VA complies with all Mitigation Measures including implementation of specific avoidance and minimization measures, as identified in the 2012 USFWS BO (see Appendix B [Biological Resources Supporting Information]). The measures provide for the long-term conservation and management of the CLT. Avoidance and minimization measures that VA will implement include those listed above. Pursuant

to the 2012 USFWS BO, all avoidance and minimization measures identified will be formally described in a CLT long-term monitoring and management plan and update as needed. The plan will be reviewed and approved by the USFWS prior to transfer and as needed thereafter.

Criteria for Evaluating	The CLT long-term monitoring and management plan includes checklists, routine inspections, expert consultations, management practices, and other evaluation criteria mechanisms to ensure success and improve upon the CLT program based upon the avoidance and minimization measure listed above. Checklists and other CLT long-term monitoring and management plan documentation are regulatory “enforceable” recordkeeping and ensure CLT long-term conservation and management.
Responsible Party	Program Manager
Estimated Completion Date	On-going and through life of the Proposed Action
