

1 **7.0 Geologic Resources**

2 **7.1. Introduction**

3 This chapter defines the geologic and soil resources pertinent to the Long Bridge Project (the Project),
4 and defines the regulatory context, methodology, and Affected Environment. For each Action
5 Alternative and the No Action Alternative, this chapter assesses the potential short-term and long-term
6 impacts on geology and soil. This chapter also discusses proposed avoidance, minimization, and
7 mitigation measures to reduce adverse impacts of the Project.

8 **Geologic and soil resources** include geologic formations or features such as point bar deposits,
9 creek/river channels, sediments, banks, and other Coastal Plain and Piedmont sediments that comprise
10 the foundation upon which the Project would be constructed. The Piedmont is mostly made
11 of metamorphic rocks, and the Coastal Plain is made of sedimentary rocks. The environmental analysis
12 considers geologic and soil resources because the Project would include ground altering activities that
13 have the potential for impacts. Key features of the geologic resources for the Project include the soil or
14 sediment types, texture, percent slope, and erodibility of upland and estuarine areas; geomorphic
15 features or the form of the landscape such as bars, channels, and river banks; and geologic hazards such
16 as faults and fractures or potential earthquake zones.

17 **7.2. Regulatory Context and Methodology**

18 This section describes the most pertinent regulatory context for evaluating impacts to geological and soil
19 resources and summarizes the methodology for evaluating current conditions and the probable
20 consequences of the alternatives. This section also includes a description of the Study Area. **Appendix**
21 **D1, Methodology Report**, provides the complete list of laws, regulations, and other guidance
22 considered, and a full description of the analysis methodology.

23 **7.2.1. Regulatory Context**

24 There are no relevant Federal, state or local laws, regulations, or Executive Orders for geologic
25 resources. However, a geotechnical evaluation of geologic resources, including soil borings and
26 collections, would be required during final design to determine appropriate foundations for the project.
27 As a result, authorization would be required from the National Park Service (NPS), typically granted
28 through a Scientific Research and Collecting Permit, for activities on property owned by NPS. It is also
29 anticipated that permits would be required by the District of Columbia (the District), Arlington County,
30 and the United States Army Corps of Engineers (USACE). The USACE, having regulatory authority
31 through Section 10 of the Rivers and Harbors Act of 1899,¹ would likely issue a Nationwide Permit 6 –
32 Survey Activities to authorize the geotechnical evaluation work. In addition, soil sampling and testing
33 may be required to evaluate levels of contaminants. The local jurisdictions regulate reporting and
34 disposal of soils samples.

¹ 33 USC 403, 33 CFR 322

35 An Erosion and Sediment Control Plan would address discharge of soils (erosion) during rainfall events
36 when construction activities have exposed soils. Approval by the local jurisdiction (the District and
37 Arlington County) of an Erosion and Sediment Control Plan would be required as part of the
38 construction plan documents. Upon approval of the Erosion and Sediment Control Plan, the local
39 jurisdictions provide review and approval of a Stormwater Pollution Prevention Plan (SWPPP) to ensure
40 that erosion control measures are permitted, implemented, monitored, and reported under the
41 National Pollutant Discharge Elimination System of the Clean Water Act of 1972.²

42 **7.2.2. Methodology**

43 The Local Study Area (shown in **Figure 7-1**) is a 0.25-mile buffer around the Long Bridge Corridor based
44 on an estimated area for the Limits of Disturbance required for construction and construction access
45 and staging. The Regional Study Area considered the Washington Metropolitan Region, which
46 encompasses the geologic resources of interest for the Project.

47 To document the Affected Environment, the analysis assessed the geologic and soil resources within the
48 Local Study Area, including the features, location, and condition. Information sources included available
49 data online, reports and data such as subsurface investigations completed for the Project or nearby
50 projects, Natural Resources Conservation Service (NRCS) soil surveys, geologic mapping, reports, and
51 local Geographic Information Systems (GIS) data. The analysis mapped estimates of the size and extent
52 of the resources using GIS.

53 Evaluation of direct and indirect impacts identified the likelihood that the Project alternatives would
54 affect or impact geologic and soil resources and considered both temporary and permanent impacts.

55 **7.3. Affected Environment**

56 This section summarizes the existing conditions of the geologic and soil resources. For a complete
57 description of the Affected Environment, see **Appendix D2, Affected Environment Report**.

58 The District is approximately 70 square miles on the northeast side of the Potomac River, adjacent to the
59 mouth of the Anacostia River, and is located where the Piedmont region of the Appalachian Mountains
60 and the Coastal Plains meet.³ Most of the District lies on the deposits of an old system of canals and
61 swamps.

² 33 USC 1251

³ Carr, Martha. 1950. *The District of Columbia, Its Rocks and Its History*. Geological Survey Bulletin 967. Accessed from <https://pubs.usgs.gov/bul/0967/report.pdf>. Accessed June 13, 2018.

62 **Figure 7-1** | Local Study Area for Geologic Resources



63

64 **7.3.1. Geology and Soils**

65 The Project is located entirely within the Atlantic Coastal Plain Physiographic Province. The Atlantic
66 Coastal Plain consists of an eastward-thickening wedge of generally unconsolidated, interbedded sands,
67 gravels, silts, and clays that overlie older, crystalline rock of the Piedmont Physiographic Province.^{4,5}
68 Within the Local Study Area, deposits on the Virginia side of the Potomac River are recent alluvium
69 (Qal), while deposits within the District are Patapsco Formation and recent alluvium (Qp).⁶ Bedrock
70 within the Local Study Area has been observed at approximately 100 feet to 125 feet below mean low
71 water elevation. More detailed information regarding the thickness and character of sedimentary
72 deposits within the Local Study Area can be found in **Appendix B3, Geotechnical Engineering Report**.

73 As shown in **Figure 7-2**, Udorthents and Urban Land soils make up the majority of the surficial soils
74 within the Local Study Area.^{7,8} **Udorthents** are deep, drained, nearly level to very steep, loamy and
75 clayey soils. Udorthents mostly consist of disturbed soils that could be surface materials stripped from
76 previous mining or other land disturbance activities. **Urban Land soils** are areas covered by impervious
77 materials (such as asphalt, concrete, or man-made structures).

78 The Virginia segment of the Local Study Area is approximately 150 acres with soils defined as Urban
79 Land-Udorthents. This area is comprised of passive park lands, sports fields, parking areas, buildings,
80 interstate, and other open-space areas. Approximately 59 percent of the Virginia Urban Land-
81 Udorthents are pervious surfaces, or soils, that are mostly vegetated. Impervious surfaces such as
82 concrete, asphalt, gravel, and buildings cover the remaining 41 percent of area. The northern segment
83 of the Local Study Area within the District is more developed, with approximately 73 percent classified
84 as impervious Urban Land. The remaining 27 percent of the area is defined as Udorthents that are
85 mostly open grassed areas with more mature landscaping throughout. Much of this area comprises park
86 land administered by NPS.

⁴ Meng, A.A., and Harsh, J.F. 1988. *Hydrogeologic Framework of the Virginia Coastal Plain*. U.S. Geological Survey Professional Paper 1404-C. Accessed from https://pubs.usgs.gov/pp/pp1404-C/pdf/pp_1404-c.pdf. Accessed June 13, 2018.

⁵ Johnston, P.M. 1964. *Geology and Ground-Water Resources of Washington D.C., and Vicinity*. Geological Survey Water-Supply Paper 1776. Plate 1. Accessed from <https://pubs.usgs.gov/wps/1776/report.pdf>. Accessed May 3, 2018.

⁶ The USGS defines alluvium as a general term for clay, silt, sand, gravel, or similar unconsolidated detrital material that was deposited during recent geologic time by a stream or other body of running water, as a sorted or semi-sorted sedimentary deposit.

⁷ Harper, John David. 2007. NRCS, United States Department of Agriculture. Soil Survey of Arlington County, Virginia. Accessed from <https://websoilsurvey.nrcs.usda.gov/>. Accessed May 3, 2018.

⁸ Smith, Horace. 1976. NRCS, United States Department of Agriculture. Soil Survey of District of Columbia. Accessed from <https://websoilsurvey.nrcs.usda.gov/>. Accessed May 3, 2018.

87 **Figure 7-2** | NRCS Soil Survey of Arlington County and District of Columbia



88

89 7.3.2. Geomorphic Features

90 Typical geomorphic features associated with Coastal Plain rivers include floodplains, levees, river banks,
91 a thalweg,⁹ and shallower broad flats within the river bottom. The Local Study Area contains all of these
92 features, although human-induced activities have altered some features, including the river banks
93 where levees would normally be. Segments of both the northern and southern sections of the Local
94 Study Area extend onto floodplains that border the Potomac River. The floodplain areas include Urban
95 Lands and Udorthents soils that mining and excavation have disturbed.

96 Both river banks extend approximately 2,000 linear feet from the upstream to downstream limits of the
97 Local Study Area. The river bank along the Virginia shoreline is more natural, with a sloped bank that has
98 various woody and herbaceous plants growing within and along the top of the bank. Some locations
99 have larger rock materials installed on the bank to slow the erosional forces of the river. The river bank
100 along the District shoreline has been hardened with a vertical bulkhead, or seawall, supporting a
101 pedestrian walkway that extends through the Local Study Area.

102 The thalweg, or channel, is located more towards the southern side of the Potomac River and is
103 approximately 150 to 200 feet wide with water depths as much as 20 feet. The edges of the channel
104 slope up to shallower flats located on each side of the river. These shallower areas have water depths
105 that range between 5 and 10 feet. The northern side of the river is a broad, shallow flat that extends for
106 more than 1,000 feet to the District shoreline.

107 7.3.3. Geologic Hazards

108 The Central Virginia Seismic Zone is the nearest seismic zone to the Local Study Area. The Local Study
109 Area is situated within an area mapped by the United States Geological Survey (USGS) as having a very
110 low earthquake risk, with a total of 11 earthquakes since 1981. The USGS reports there is a
111 0.46 percent chance of a major earthquake within 50 kilometers (31 miles) of the District within the next
112 50 years.¹⁰ On August 23, 2011, an earthquake with a magnitude of 5.8 occurred with an epicenter area
113 located 90 miles from the Local Study Area, in Louisa County, Virginia.¹¹ The 2011 earthquake caused no
114 damage to bridges. The earthquake damaged several landmarks in the District including the Washington
115 Monument, located approximately 1,000 feet northwest of the Local Study Area.

116 7.4. Permanent or Long-Term Effects

117 This section discusses the permanent or long-term effects following the construction of the No Action
118 Alternative and Action Alternatives on the geologic and soil resources within the Local and Regional
119 Study Areas. For a complete description of the permanent or long-term effects, see **Appendix D3,**
120 **Environmental Consequences Report.**

⁹ A thalweg is the deepest point of the river normally associated with the navigation channel.

¹⁰ Petersen et. al. 2014. Documentation for the 2014 Update of the United States National Seismic Hazard Maps. Accessed from <https://pubs.usgs.gov/of/2014/1091/pdf/ofr2014-1092.pdf>. Accessed May 3, 2018.

¹¹ Horton, J.W. Jr. and R.A. Williams. 2012. The 2011 Virginia Earthquake: What are Scientists Learning? EOS Trans. AGU 93(33), 317. Accessed from <http://onlinelibrary.wiley.com/doi/10.1029/eost2012EO33/epdf>. Accessed May 3, 2018.

121 **7.4.1. Geologic Resources**

122 **7.4.1.1. No Action Alternative**

123 The No Action Alternative would have no long-term effects to geologic resources because there would
124 be no changes to the existing geologic or geomorphic features within the Local Study Area. Potential
125 construction activities within the Local Study Area include the addition of a fourth track from the AF to
126 RO Interlocking and LE to VA Interlocking, VRE L’Enfant Station Improvements, and VRE’s North and
127 South Storage Tracks. Additionally, proposed improvements at Long Bridge Park include a new aquatics
128 center, parking, and support facilities. These projects would not alter or change any geologic or
129 geomorphic features since they are located outside the river floodplain, river banks, river thalweg, and
130 shallow flats of the river. The existing railroad bridge and infrastructure throughout the Long Bridge
131 Corridor would continue to function and operate under existing conditions. The existing bridges and
132 structural components would continue to be susceptible to earthquake activity occurring in the Regional
133 Study Area.

134 **7.4.1.2. Action Alternative A (Preferred Alternative)**

135 Action Alternative A would have minor permanent direct adverse impacts to geologic resources since
136 the footprint of the railroad widening and bridge structures is relatively small and localized and would
137 not affect the function or integrity of the resource. Specifically:

- 138 • Placement of a new two-track bridge upstream of the existing Long Bridge and the
139 redevelopment of the existing Corridor to expand the north-south railroad system from two to
140 four tracks would require new foundation systems secured into the ground or riverbed of the
141 Potomac River and Washington Channel, as well as earthwork and earth retaining structures
142 within the Corridor.
- 143 • Minor alterations to the geomorphic features within the Local Study Area would include grading
144 and filling of approximately 5,000 square feet of floodplain for landside track expansion and
145 bridge construction, but these modifications would not affect the function or integrity of the
146 resource. See **Chapter 6.4.3, Flood Hazards and Floodplain Management**, for further discussion
147 on the effects to floodplain functions.
- 148 • Bridge foundations within the river would exist below the riverbed with only cylindrical piles
149 extending through the water column to support the new bridge structures. For the Potomac
150 River, the new bridge structures would impact approximately 600 square feet of the broad,
151 shallow flats located on either side of the river channel. The Washington Channel bridge piles
152 would impact approximately 100 square feet of the river bed, but the effects from both
153 crossings would be minor, localized, and would not affect the function or integrity of the
154 resource.
- 155 • New bridges and structures would be less susceptible than existing structures to earthquake
156 activity occurring in the Regional Study Area since they would be constructed in accordance with
157 current seismic structural criteria. However, the existing bridges and structural components
158 would continue to be susceptible to earthquake activity occurring in the Regional Study Area.

159 The new bridges, retaining walls, and embankment construction would be designed in accordance with
160 recommendations based on site specific geotechnical and hydrologic and hydraulic investigations to be
161 completed during final design. These investigations would further the understanding and assessment of
162 effects and would include a scour analysis to assess the stability of the geomorphic features adjacent to
163 the proposed structures. These future studies would also include potential mitigation measures for any
164 impacts.

165 **7.4.1.3. Action Alternative B**

166 Action Alternative B would have similar effects as Action Alternative A. However, demolition and
167 replacement of the existing bridge would require replacing abutments, foundations, and bridge
168 structures between the George Washington Memorial Parkway (GWMP) and Ohio Drive SW. The
169 replacement work would occur within the same general footprint as the existing infrastructure and
170 would represent small, localized changes to geomorphic features within the Local Study Area. All project
171 elements under Action Alternative B would be less susceptible to earthquake activity occurring in the
172 Regional Study Area as everything would be constructed in accordance with current seismic structural
173 criteria.

174 **7.4.2. Soils**

175 **7.4.2.1. No Action Alternative**

176 The No Action Alternative would have permanent direct adverse impacts to soil resources since there
177 would be soil disturbances or surficial changes within the Local Study Area. Potential improvements
178 within the Local Study Area would be the same as those described in **Section 7.4.1.1, Geologic**
179 **Resources, No Action Alternative**. These projects would result in a net loss of soils as buildings, parking,
180 and track expansions are added within the Local Study Area. However, most of the expansion areas
181 would occur upon existing impervious surfaces. The existing railroad bridge and infrastructure within the
182 Local Study Area would continue to function and operate under existing conditions (see **Figure 7-2**). Any
183 railroad maintenance activities within the Corridor would disturb railroad ballast stone and would not
184 affect natural soils.

185 **7.4.2.2. Action Alternative A (Preferred Alternative)**

186 Action Alternative A would have minor permanent direct adverse impacts to soil resources since the
187 footprint of the railroad widening and bridge structures would be relatively small and localized and
188 would not affect the function or integrity of the resource. Construction of a new two-track bridge
189 upstream of the existing Long Bridge and the redevelopment of the existing Corridor to expand the
190 north-south railroad system from two to four tracks would require earthwork activities to expand the
191 railroad embankments, to construct new bridge abutments, and to install supporting infrastructure.
192 Approximately 4,200 square feet of soil resources would be replaced with structural elements
193 associated with Action Alternative A.

194 The primary concern related to soils is the potential for soil loss from erosion during and following
195 construction, as described in **Section 7.5.2, Soils**.

196 **7.4.2.3. Action Alternative B**

197 Action Alternative B would result in similar effects as described for Action Alternative A, which are minor
198 permanent direct adverse impacts to soil resources. The primary difference with Action Alternative B is
199 the replacement of existing infrastructure within the Corridor that would include replacing abutments,
200 foundations, and new bridge structures between the GWMP and Ohio Drive SW. The additional
201 infrastructure replacement would occur within the same general footprint as the existing infrastructure,
202 representing small, localized changes or disturbances to soils within the Local Study Area.

203 **7.5. Temporary Effects**

204 This section discusses the direct or indirect temporary effects of the No Action Alternative and Action
205 Alternatives during construction, based on conceptual engineering design. For the complete technical
206 analysis of the potential temporary impacts to geologic and soil resources, see **Appendix D3,**
207 **Environmental Consequences Report.**

208 During the construction phase of the Project, each Action Alternative is expected to have construction
209 access and staging areas that could disturb the existing landside and waterside features adjacent to the
210 permanent improvements.

211 **7.5.1. Geologic Resources**

212 **7.5.1.1. No Action Alternative**

213 The No Action Alternative would have no temporary effects to geologic resources. Potential
214 improvements within the Local Study Area would be the same as those described in **Section 7.4.1.1,**
215 **Geologic Resources, No Action Alternative.** These projects would be located outside geologic resources
216 being evaluated such as the floodplain, river banks, thalweg, and shallow river flats. Under the No Action
217 Alternative, the existing railroad bridge and infrastructure throughout the Long Bridge Corridor would
218 continue to function and operate under existing conditions.

219 **7.5.1.2. Action Alternative A (Preferred Alternative)**

220 Action Alternative A would have minor temporary direct adverse impacts to geologic resources.
221 Construction impacts would occur over a period of approximately 5 years. During the construction
222 phases of Action Alternative A, various points of access would occur throughout the Corridor including
223 areas such as Long Bridge Park, East Potomac Park, and the Potomac River shoreline. Impacts associated
224 with temporary construction access roads, storage, and staging would temporarily disturb
225 approximately 5.7 acres of floodplain. Demolition of the existing two-track bridges over I-395, Ohio
226 Drive, Washington Channel, Maine Avenue, and Maiden Avenue would occur, but once demolition and
227 construction are completed, the temporarily disturbed features would be returned to pre-construction
228 conditions.

229 Temporary impacts to riverine features such as the shallow riverbed adjacent to the channel would
230 occur through the installation of cofferdams around the 22 proposed bridge piers. Riverbed material
231 would be removed from within the cofferdam to facilitate construction of the bridge foundations. The
232 cofferdam structures, covering approximately 42,000 square feet of riverbed, would be removed once
233 the foundation construction was complete and the riverbed adjacent to the new bridge supports would

234 be returned to pre-construction conditions. The restored riverbed would be exposed to existing tidal
235 currents and frequent flood events that constantly move river sediments, potentially returning these
236 temporary impact areas to more natural conditions in a relatively quick timeframe.

237 **7.5.1.3. Action Alternative B**

238 Action Alternative B would result in similar effects as described for Action Alternative A—minor
239 temporary direct adverse impacts to geologic resources—except that Action Alternative B would include
240 additional temporary effects from the replacement of existing infrastructure within the Corridor.
241 Construction impacts would occur over a period of approximately 8 years and 3 months. Additional work
242 would include demolishing and replacing abutments, foundations, and bridge structures between the
243 GWMP and Ohio Drive SW. The additional infrastructure replacement would occur within the same
244 general footprint as the existing infrastructure, representing small, localized changes or disturbances to
245 geologic resources (floodplain and riverbed features) within the Local Study Area.

246 **7.5.2. Soils**

247 **7.5.2.1. No Action Alternative**

248 The No Action Alternative would have adverse temporary effects to soil resources. Potential
249 improvements within the Local Study Area would be similar to those described in **Section 7.4.1.1,**
250 **Geologic Resources, No Action Alternative.** Temporary effects to soil resources would occur as
251 permanent improvements are constructed, such as construction access, staging and stockpiling, and
252 demolition/construction work. However, portions of the expansion areas would occur in areas where
253 there are no soil resources due to urban development. In this case, there would be no adverse
254 temporary effects to soil resources. Under the No Action Alternative, the existing railroad bridge and
255 infrastructure throughout the Long Bridge Corridor would continue to function and operate under
256 existing conditions.

257 **7.5.2.2. Action Alternative A (Preferred Alternative)**

258 Action Alternative A would have minor temporary direct adverse impacts to soil resources since the
259 disturbed areas would be returned to preconstruction conditions and would not affect the function or
260 integrity of the resource. Construction impacts would occur over a period of approximately 5 years.
261 Temporary effects to soil resources would result from construction access, staging and stockpiling, and
262 demolition/construction work of the permanent improvements described in **Section 7.4.2.1, Soils,**
263 **Action Alternative A.** Similar disturbances would occur during the demolition phase of the existing
264 two-track bridges over I-395, Ohio Drive, Washington Channel, Maine Avenue, and Maiden Lane.

265 The primary concern related to soils is the potential for soil loss from erosion during and following
266 demolition and construction. Removal of existing vegetative cover like trees and grasses can destabilize
267 soils, making them susceptible to erosion during rainfall events. The erodibility of existing soils in the
268 Local Study Area is variable due to previous disturbance and potentially imported materials. However,
269 further investigations during the design phase would identify appropriate temporary stabilization
270 measures for specific locations that could include items such as silt fences, rock check dams, soil
271 stabilization blankets, turbidity curtains, and temporary seeding. A SWPPP would be developed to

272 provide guidance and strict adherence to erosion and sediment control measures developed for the
273 project.

274 The project would require the excavation and removal of more than 29,000 cubic yards of soil for
275 construction, primarily of the structure foundations and piers. These soils would be removed and
276 disposed of offsite in accordance with applicable laws and regulations. See **Chapter 8, Solid Waste and
277 Hazardous Materials**, for further discussion on the offsite disposal of potential soil materials. Temporary
278 disturbances within the Potomac River and Washington Channel have the potential to increase localized
279 levels of suspended sediments in the water column and effect water quality. See **Chapter 6, Water
280 Resources and Water Quality**, for further discussion of suspended sediments.

281 **7.5.2.3. Action Alternative B**

282 Action Alternative B would generate temporary effects similar in location and extent as those caused in
283 Action Alternative A, resulting in minor temporary direct adverse impacts to soil resources. Construction
284 impacts would occur over a period of approximately 8 years and 3 months. The primary difference
285 between Action Alternative A and Action Alternative B is the replacement of existing infrastructure
286 within the Corridor, including the demolition and replacement of abutments, foundations, and piers
287 between the GWMP and Ohio Drive SW in Action Alternative B. To enable the replacement of this
288 infrastructure, approximately 16,000 cubic yards of soil would need to be removed, in addition to the
289 29,000 cubic yards that would be excavated and removed for the construction of the new structures,
290 totaling approximately 45,000 cubic yards. The replacement of the infrastructure would occur within the
291 same general footprint of the existing structures, representing localized changes or disturbances to soils
292 within the Local Study Area. Temporary stabilization measures would be implemented as described in
293 Action Alternative A to minimize temporary soil loss during construction.

294 **7.6. Avoidance, Minimization, and Mitigation**

295 This section describes proposed mitigation for the impacts to geologic resource and soil resources.

296 **7.6.1. Geology**

297 Minor adverse effects to geomorphic features like the floodplain and riverbed may occur due to
298 construction of a new two-track bridge upstream of the existing Long Bridge. These geomorphic features
299 cannot be avoided while achieving the goals and objectives of the Project. The Federal Railroad
300 Administration and the District Department of Transportation have minimized adverse effects to the
301 floodplain feature in design through the use of retaining walls along the track expansion. The vertical
302 retaining walls would reduce the footprint and preserve existing floodplain features to the greatest
303 extent practicable. Impacts would be minor, localized, and not affect the function or integrity of the
304 resource; no mitigation is proposed.

305 **7.6.2. Soils**

306 The Action Alternatives would have minor adverse effects on soil resources within the Local Study Area
307 due to the expanded railroad embankments, bridge abutment construction, and supporting
308 infrastructure. The Virginia Department of Rail and Public Transportation, the project sponsor for final
309 design and construction, would require the contractor to employ soil stabilization blankets, silt fences,
310 rock check dams, and other best management practices designed to control soil loss during and

311 following construction to minimize erosion of soil resources. The use of retaining walls would also
312 minimize the project footprint and disturbance to soil resources.

313 Final construction documents would include an approved erosion and sediment control plan and an
314 approved SWPPP from the Virginia Department of Environmental Quality and the District Department of
315 Energy and Environment, further minimizing long-term erosion hazards. Impacts would be minor,
316 localized, and not affect the function or integrity of the resource, so no mitigation is proposed.