EA PREPARATION PROTOCOL

INTRODUCTION

Past attempts to develop formats or systems for preparing Environmental Assessments have focused on creating a template for the document itself. For some agencies with repetitive project types within a specific, limited geographic area, this can be a useful strategy for streamlining the EA preparation process.

For most agencies and projects, however, it is more useful to focus on the characteristics of the proposed action itself, and create a systematic way of describing and analyzing the proposal, alternatives, environmental issues, and impacts. The idea here is that once certain questions are asked and answered in a systematic way, the document practically writes itself.

Note that some questions on the EA Preparation Protocol, especially those dealing with the nature of the proposed action, are deceptively simple. Questions such as "where is the project" or "how big is the project" are intended to help develop the *context* for further analysis, and should be explored in detail during the project kickoff or the first Interdisciplinary Team meeting. Given the importance of context as a factor in determining significance, it is vital to understand from the outset that the location of a project and its relative size (given that location) can influence the nature of environmental issues, public involvement programs, mitigation measures, and significance of impacts.

Other items in the protocol ask the team to develop a graphic to express the overall nature of the proposed action. This can be conceived as an illustration of project features, or as the expression of the desired future outcome once the project is successfully completed. In any event, developing such a visual representation will assist the Interdisciplinary Team and the document reader to understand more clearly what is intended, and is desirable for that reason alone.

EA PREPARATION PROTOCOL

Preliminary Information

Format Information

1. What type of document is being prepared?

2. What is the agency's required format?

3. How many pages will the document be?

4. What formatting tools will be used?
   - Outline method

- Font and typeface
- Paragraph style

5. Method for submitting contents

6. Who is responsible for quality control?

7. Who has approval authority?

8. Where will the project file be kept?

Content Information

1. What is the Purpose and Need for the project?

2. What, specifically, does the project consist of?

   - Where, specifically, is the project? (State, county, city?; indoors, outdoors?; urban or rural?; laboratory, forest, lake, farm?)
   - How big is the project? (acres, miles, gallons, square feet)
   - How long will the project continue? (Distinguish construction and operations phases, life-cycle features)
   - What are all of the project components? (Roads, buildings, land alterations, clean-up facilities, parking, recreational features, intakes/outlets, utilities)
   - Which of these components could be considered <u>connected actions</u>?
   - Which of these components could be considered <u>cumulative actions?</u>
   - Which of these components could be considered <u>similar actions</u>?

3. Will any permits be needed for the project?

4. Is this project related to any projects for which other NEPA documents were prepared?

5. What environmental issues (especially "show stopper" issues) may arise during the life of this project?

6. What environmental reports already exist for this project or for very similar projects?

7. What agencies or organizations should be consulted as data are collected for this project?

8. What decisions will the agency make about this project?

I. Purpose and Need

The Purpose and Need chapter sets the scene and provides the basis for evaluation of alternatives.

1. What is the purpose of and need for the agency action?

2. Describe the public involvement process, if any.

3. What are the significant issues that will be examined in detail?

4. What issues were eliminated from detailed analysis as not significant, and why?

5. What decision(s) must the agency make on the basis of this document?

II. Alternatives including the Proposed Action

The Alternatives chapter describes the proposed action and each action alternative that meets the purpose and need. It also includes a description of the "no action" alternative and a comparison of the effects of each alternative, including "no action."

1. Describe the proposal, including all connected, cumulative, and similar actions.

2. Describe an action alternative that will meet the purpose and need for the project in a different way; and another one; and another one.

3. Describe "no action".

4. Describe any alternatives eliminated from detailed study: Why were they eliminated?

5. Which (if any) alternative(s) fall outside the jurisdiction of the lead agency?

6. Describe any mitigation measures not already covered in the proposed action or alternatives.

Include a Comparison Matrix:

Issue Name:	Alt. A	Alt. B	Alt. C	Alt. D	Alt. E

III. Environmental Consequences

Affected Environment

Organize information on the Affected Environment by resource (or issue), and by alternative. Whichever format you choose, make sure the same one is used in the Environmental Consequences section.

By Resource or Issue:	By Alternative:
Resource A:	Alternative 1:
Alternative 1	Resource A
Alternative 2	Resource B
Resource B:	Alternative 2:
Alternative 1	Resource A
Alternative 2	Resource B

Environmental Consequences

The purpose of the Environmental Consequences section is to summarize the major data on significant impacts; the focus is on significant impacts that will influence the final decision about the action.

Based on the format selected for Affected Environment, complete a description of the Environmental Consequences for each alternative, including No Action:

Proposed Action:

Action Alternative #1:

Action Alternative #2:

Action Alternative #3:

No Action:

IV. List of Preparers, Reviewers, and Agencies, Organizations and Persons to Whom Copies are Sent

This chapter consists of two kinds of lists: (1) preparers and reviewers of the document, and (2) agencies, organizations and persons consulted during its preparation.

List of Preparers and Reviewers

Name	Qualifications	Section Prepared

List of Agencies, Organizations, and Persons to Whom Copies are Sent

This is essentially the mailing list for public involvement, and therefore its presence or absence may depend on agency-specific policies for public involvement on EAs. Whether or not this section is required, it provides a handy place to keep track of those agencies or others consulted during preparation of the EA. Make sure to list all those agencies with jurisdiction by law or expertise who were consulted; if the list is used only for this purpose, it should be relabelled accordingly.

Record the list of agencies, organizations, and persons to whom copies are sent.

V. Appendix

List any materials, reports, maps, tables, or other graphics that might be appropriate to include in an appendix.

The FONSI

The Finding of No Significant Impact (FONSI) is the final NEPA product in an EA context. It is a legal "finding" that the proposed action (or selected alternative) will not have a significant impact, and provides the rationale for the decision not to prepare an Environmental Impact Statement.

The FONSI should include at least the following:

- Title and date of EA
- Name or description of selected alternative
- Names of related projects, if any
- List of mitigation measures, environmental agreements, stipulations, conditions of approval, etc. added to the selected alternative to reduce expected impacts below the threshold of significance, if any (NOT design features of the alternative selected)
- Evidence cited in the EA that demonstrates that the impacts from the selected alternative do not meet the criteria for significance in the CEQ regulations
- Statement of legal finding for each of the CEQ significance criteria

Refer to agency-specific guidance for format and additional requirements.