

Incorporating Cumulative Effects into NEPA Documents (Newsletter)*

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CEQ regulations require agencies to incorporate cumulative effects analyses into environmental impact assessments <<http://www.nepa.gov/>>. Although these directions are 11 years old they are still useful, even though they are quite general. A frustration expressed by agency NEPA specialists is just how to incorporate cumulative effects in a competent and useful way. A number of potential methods and tools are summarized in the CEQ report, but how to select and apply each tool is left unexplained. This brief newsletter offers one approach to fulfilling this NEPA requirement.

Effects (or impacts, the terms are used interchangeably) may be positive as well as negative; the good side is sometimes overlooked if attention is drawn only to potential deleterious changes.

The CEQ recommends incorporating cumulative effects when scoping the coverage of the assessment, defining project alternatives, and describing the affected environments.

Two key factors determine what activities to include: the spatial and temporal distributions of the proposed activity and other past, current, and foreseeable future activities. As examples, surface water cumulative effects should be within the drainage basin of the proposed project, and wildlife habitat cumulative effects for a species should be within the range of the local population. On the temporal side, impacts during construction but not operations should be considered with other activities occurring in the construction phase, not earlier or later.

When assessment scoping is conducted early in planning the proposed project the public might identify other activities they believe could have cumulative effects, and these can be incorporated into Plans of Operation. Early identification of concerns also helps define what components should be included in each category of the economic, natural, and societal environments. Baseline data for these components will be more focused and effective, and the description of the existing environment then includes other activities that might contribute to cumulative effects.

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Alternative Plans of Operation can be built from a core of two to four feasible approaches. Each plan alternative can include different mitigation strategies and different scenarios of cumulative effects. With a single Plan of Operations having several alternatives based on differences in mitigation and cumulative effects, several affected environments can be described. Evaluating these alternatives equally and objectively is a requirement of NEPA and CEQ regulations and strengthens the basis and support of the regulator's decision.

It is important to remember that all the affected environments are forecasts based on past experiences and the professional judgments of the technical experts, so the use of comparative terms ("slightly decrease", "moderately increase", etc.) is appropriate when describing these alternative future environments. These comparative terms are more realistic than are specific numbers when predicting environments years in the future.

Objectively incorporating cumulative effects into scoping, alternatives definitions, and the alternative future (affected) environments is easier and more technically sound and legally defensible than is using words, numeric models, or maps which leave interpretation open to subjective opinions. Everything done to reduce subjectivity in environmental impact assessments strengthens the results and allows decisions to be made more quickly and confidently. This benefits the project proponent, the regulator, and the public.