

Why don't you talk to us about EA alternatives.

>> M. Conry: The 1988 NEPA Handbook doesn't discuss alternatives in environmental assessments extensively at all, and the 1988 handbook did not require analysis of the no action alternative. The new handbook does require some consideration of a no action alternative in your EA. The no action alternative is great to analyze or look at because it provides a very valuable comparison between your proposed action and the effects of that or the effects of any other action alternatives and the consequences of not taking action at all. This is another idea that came from CEQ when working through the handbook and the council on environmental quality. Again, they clearly stated that their interpretation of regulations requires some consideration be given to the no action alternative in EAs, even though you can't find that explicitly in the regulations. Moving off of the topic of the just the no action alternative, if you happen to have unresolved conflicts, you need to have other action alternatives within your EA. Remember however, that you're only required to look at reasonable alternatives that meet your purpose and need. Lastly, if you consider different alternatives but decide not to analyze them in detail during your NEPA process, we recommend that you document them. You can document them in your EA, and this helps to provide some insight and transparency to the NEPA process and helps the public understand sort of our internal decision making.

>> C. Humphrey: Well, Megan, you went through a lot of stuff and I would recommend that probably people need to read section 8.3.4.2 very carefully before developing their EA alternatives --

Question:

>> C. Humphrey: Hello, rich. Go ahead.

>> Participant: In the purpose and need, the BLM action is to approve condition or deny the application. I would assume that to deny the application would be your no action alternative. Would that be a correct assumption?

>> M. Conry: I think the whole panel is saying yes. That is a correct assumption.

>> Participant: So for our right-of-way our range of alternative is to approve condition and then no action alternative deny. Other routes a 230 mile linear would not be alternatives?

>> M. Conry: I -- well, I would ask you a question. Are there other alternatives across BLM administered land? Is that what you're talking about --

>> Participant: If the proposed action is to approve condition or deny.

>> T. Milesnick: I think if there's other alternative routes that cross BLM land, would that still meet the purpose and need of what the -- for the right-of-way that we could then look at those as other alternatives than what you're discussing, just the applicants proposal, and then a no action. So if there's other alternative courses or locations for that right-of-way, that could be considered in another alternative.

>> R. Hardt: I would consider that part of an alternative that would approve the right-of-way but under different conditions that the applicant proposed. Yes, we'll give you the right-of-way but we're changing the

route.