I want to summarize what we've learned and some potential fatal flaws to kind of conclude before we go onto our next exercise so we can kind of get the bottom line about what we have to avoid and putting together a good impacts analysis. So I've got a column here, Mistakes and Solutions, and so we're going to go through these and kind of explain what we're talking about.

Mistake. Reiterating the alternatives and calling it analysis. What this basically is is some of those bad examples you saw did that. They basically said, this is what the alternative would do, and this is the conclusion, without having rationale and good impacts analysis and without developing any sort of linkages. Now, the solution to this is make sure you have your environmental consequences, description, and your affected environment described using an indicator and make sure you have that indicator quantifiable and there for comparison for your impacts.

Conclusory statements. This is making a conclusion without a rationale. You need to make sure you document your rationale linkages. This would impact this because it would do this, this and this, and then link that to your indicator, and a thousand acres of this would happen.

Not disclosing indirect impacts. Remember that when you go through that cause-and-effect analysis which we described in the previous module, part of that cause-and-effect analysis was making sure that every direct and indirect impact you note and that you have an indicator for each one. That ensures you'll track both those impacts throughout your environmental consequences section.

Not identifying impact linkages. Again, discuss those impact linkages and rationale both in your cause-and-effect analysis and in your Chapter 4 or environmental consequences section.

Indefensible rationale. Make sure your rationale is scientifically robust and is reasonable. The courts often rule what's called the rule of reason, which is a little more rigorous than the arbitrary and capricious level of review, and rule of reason says: Is what they're saying reasonable? Does it have scientific basis? Does it make sense?

Next one, using different resource indicators in Chapter 3 and Chapter 4. Always use identical indicators in your affected environment and environmental consequences section.

Using different resource indicators between alternatives. You always want to use identical resource indicators for the same resource for doing your impacts analysis of different alternatives because NEPA and the CEQ regulations for the implementation of NEPA require that alternatives have the same level of review.

If you don't disclose analysis assumption or data limitations, then you're essentially misleading readers as well. Readers need to know explicitly what assumptions you've made and what data limitations there are and the best place to do that is at the start of your resource analysis.