

NEPA Analysis Process: Environmental Consequences

M. Conry: The final step in your NEPA analysis is to analyze the environmental consequences.

It's by looking at the environmental consequences of our action that we achieve the overall purpose of NEPA. This section will address the issues that you've identified earlier in your NEPA process.

Your environmental consequences section develops an overall pyramid of evidence. First, the ID team will gather evidence and information regarding resources, will apply logic in thinking through how the proposed action or alternatives could affect those resources, and draw basic conclusions about those overall impacts.

These are then, in turn, used by decision makers in making the ultimate determination of if or how to move forward with agency action.

I've noticed as we work through the NEPA process it can sometimes be easy to lose sight of exactly what the decision is to be made at the end. I find it helpful to keep the decision maker engaged and keep the ID team focused on the issues for analysis in support of their overall decision at the end of the process.

At the end of the day, the BLM must demonstrate that it's taken a hard look at the potential impacts to social, physical and biological resources in order to comply with NEPA.

Now that you understand the importance of this section, let's discuss a little bit how to write the actual environmental consequences.

The first step in writing environmental consequences or analyzing environmental consequences is to make good use of the existing information. As I said with the affected environment discussion, you may find lots of useful information in other NEPA documents, scientific literature and so on. You may tie to broader NEPA analyses. And you can incorporate other resource information by reference. Remember to cite and summarize.

You may not be able to get all of the information, however, that you would like or need for your analysis. Relevant information regarding an aspect may be incomplete or unavailable. If this is the case, you should describe the missing information and describe how this could affect your overall assumptions or your overall analysis.

The next step is to describe your analytical methodology and assumptions. It's very important to describe your thought process as your methods and assumptions, for example, how you look at reasonably foreseeable development scenarios, can drastically shape your overall conclusions about environmental impacts.

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In doing so, you should describe how you're going to analyze your impacts, what methods will you use, how you plan to describe your results, any geographic and temporal scales that you're using to perform the analysis, units of measure that you plan to use, and lastly, any relevant thresholds, such as thresholds established by law or statute.

I find it incredibly helpful to get your interdisciplinary team thinking about this early on in the process. If you can establish a solid framework by which you want to perform the analysis, it can save a lot of questioning and frustration later on as folks are trying to figure out how to present impacts.

Next in performing your analysis of environmental consequences, remember to stay focused. You only need to analyze the issues that you've identified.

Fourth, describe the direct, indirect and cumulative impacts of your action and alternatives. I'll talk about these briefly.

Direct impacts are those impacts caused by your action or alternative and occurring at the same time or place.

Indirect effects are impacts caused by the action, but they have some element of removal. They're either later in time or further removed in distance.

The last type of impact is a cumulative impact. I know you've all heard a lot about this, but a cumulative impact is that impact to resources resulting from the incremental impact of your action when considered with other past, present and reasonably foreseeable future actions on the same resource. Remember in your cumulative impacts you're looking at impacts to the same resource.

So focus on getting your analysis right. This is much more important than getting your impacts labeled correctly. Ultimately, if you get a little confused and call one indirect as opposed to direct, it's not a big deal. The key is that your effects are analyzed.

In doing your effects analysis, use your interdisciplinary team to develop your analytical conclusions regarding the issues. Your interdisciplinary team has good insight and can recognize other ongoing actions that may be affecting the same resources. Your interdisciplinary team can also be helpful in identifying reasonably foreseeable future actions, including the actions of other land owners, even private land owners, or federal agencies. Lastly, an ID team can be helpful in identifying any mitigation measures that would reduce the impacts described.

You will need to explain how mitigation measures would be effective in reducing or avoiding impacts within your analysis. You also need to describe any residual adverse effects would that remain after mitigation is applied.

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C. Humphrey: This is a very complex topic, environmental consequences and the cumulative effects analysis, and we have some other resources that you can go to if you'd like more information or more practice. We have a new analyzing impacts online course. It has several exercises that will allow you to practice doing your impacts analysis. And then we also have a three-hour broadcast on cumulative effects. So if you're interested in these resources, go to the Resources tab on your screen and find out how to access this information. Thanks.