

## NEPA Analysis Process: Related Actions

M. Conry: Once you develop the "who," "what," "how," "when" and "where" of the proposed action, you must determine whether or not there are connected or cumulative actions that must be considered in the same NEPA document. Also consider carefully whether there are similar actions that you could benefit from discussing in the same NEPA document.

In an EIS, you are required to discuss connected and cumulative actions in the same NEPA document. This is a requirement established by the CEQ regulations. For environmental assessments, while it's not required, we recommend that you discuss connected and cumulative actions in the same EA. It will really improve your overall effects analysis.

I'll quickly explain the difference between connected, cumulative and similar actions.

First, what's a connected action? Actions are connected if they automatically trigger other actions that may require an environmental impact statement, if the actions cannot or will not proceed unless other actions are taken previously or simultaneously, or, lastly, if the actions are interdependent parts of a larger action and depend on that larger action for their justification.

Actions that are not yet proposed cannot be connected actions, but they may need to be considered in your cumulative impacts assessment if they are reasonably foreseeable.

Connected actions may be other BLM actions, other federal actions, such as an action undertaken by the National Park Service or Fish & Wildlife Service, or they may even be nonfederal actions undertaken by private entities.

C. Humphrey: As you can tell, connected actions are a very complex topic, and rather than going into it more right here, we did a 90-minute broadcast on connected actions, and if you'd like to watch that broadcast, then you can go to the Resources tab, which is on your screen, and find out how to access it.

M. Conry: Cumulative actions are the second type of related action to be considered in your analysis. Cumulative actions are those actions that potentially have a cumulatively significant impact together with your proposed action. These should be discussed in the same NEPA document. Cumulative actions must be addressed in your cumulative impact analysis. You may choose to incorporate other cumulative actions into your proposed action as long as they're currently proposed federal actions. You would not choose to incorporate the actions of a private industry or private land owner into your own proposed action.

C. Humphrey: All right. What is the difference between cumulative actions and what you analyze in your cumulative impacts analysis. I get those mixed up all the time.

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M. Conry: That's okay. I think we do, as well. And that's a really messy topic.

Cumulative actions are limited to currently proposed federal actions. Your cumulative effects analysis has to address all of those past, present, and reasonably foreseeable future actions that could affect a particular resource regardless of who the actor is. So, ultimately, cumulative actions can only be federal actions. It's not the whole suite of scope -- or the whole suite of impacts that have to be accounted for in your cumulative effects analysis. Your analysis is going to be broader-ranging.

So that sums up cumulative actions. The very last type of related action that you need to consider is a similar action. Similar actions are those proposed or reasonably foreseeable federal actions that have similarities with your proposed action, such as timing, geography or the type of action. Similar actions may be analyzed in the same NEPA document, however, that's not required. We'll go through an exercise here to hopefully clarify some of these concepts for you.

J. Pollet: Now, let's turn to Exercise 4 in your Participant Guide. Recall the example of the proposed action which was a special recreation permit for a dogsled race that we talked about in Exercise 3. We're going to look at three actions and decide if these actions could be connected, cumulative or similar.

For the first example, the action is a mining claimant is requesting a permit for an overland move of heavy equipment in winter over a portion of the Steese Trail to access his mining claim. Could that be a connected, cumulative or similar action?

R. Hardt: I don't think we'd consider it connected because there's no interdependence here with the sled race. But an example like this, we've got to fill in the blanks a little bit here. If we explain that the dogsled race has the potential to result in some disturbance of the local lynx population, this overland move could also result in disturbance of that lynx population, then we could see that there's a potential cumulative effect on the lynx population from both actions, so we would consider this a cumulative action.

J. Pollet: I think that's definitely the case for this example. I happen to know a little bit about this area.

On the next example, the Iditarod trail sled dog race that occurs about two weeks late or portions of trails that are managed by an adjacent field office. Now, would that be connected, cumulative, or potentially similar?

M. Conry: Jolie, I think these are clearly similar actions, and I think between the Iditarod trail sled dog race and the previous dogsled race you mentioned, you have a real opportunity to gain some efficiency in your NEPA process by looking at them both in the same NEPA document. You're looking at the same type of action, and there may be

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some common resource impacts. They're within the same temporal scale. If I were in these offices, I would talk about doing a joint NEPA document, even.

J. Pollet: Yeah, it might make sense for these two offices to team up and do this analysis together in the same NEPA document. I bet a lot of the impacts will be very similar.

M. Conry: Yep.

R. Hardt: But like I say, we have to fill in the blanks a little bit here. We would say here that the Iditarod trail race isn't going to have cumulative effect on that same lynx population as the original one. So there's not actually any cumulative effect on those resources, just a similar type of effect on the resources.

C. Humphrey: Good distinction.

J. Pollet: Now, for the last example, where the BLM must conduct trail maintenance to remove brush and tree overgrowth on the Steese Trail prior to the Yukon Quest International race, what kind of action is that?

M. Conry: I think the trail maintenance activity is clearly a connected action with the overall permitting of that dogsled race. You wouldn't be out there doing any sort of trail maintenance but for preparation for the dog sledding race. This is an interdependent action with the overall race itself, and I would recommend looking at these in the same EA.

J. Pollet: I think that's good advice, Meagan.