

K. Bogdan: So now we're at Step 7, and we need to describe the relationship of cumulative effects to any threshold. We need to interpret what the cumulative effect would mean for the resource, so these identified thresholds, which can be based on regulatory or biological thresholds, can establish a useful point of comparison for interpreting the impact on the resource.

When conducting analysis for an environmental assessment for instance, you need to evaluate impacts to provide a basis for determining whether the impact is significant, usually related to the threshold. When evaluating effects to determine significance, not everything analyzed in the cumulative effects analysis though is counted towards the significance of the BLM action. CEQ NEPA regulations say that significance depends on whether the action is related to the other actions with individually insignificant but cumulatively significant impact.

Other actions are related to the action if they are connected or cumulative actions. Actions are connected if they automatically trigger other actions that may require an EIS, cannot or will not proceed unless the other action is taken previously or simultaneously or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification. Connected actions are limited to actions that are currently proposed right for decision. The source of that is from BLM's NEPA Handbook section 6.5.2.1. Now cumulative actions are other proposed actions which, when viewed with your proposed action, have a potentially cumulatively significant impact related to one or more identified issues.

R. Hardt: So in summary, in determining the significance of the BLM actions, you count only the effects of BLM actions together with the effects of connected and cumulative actions to the extent that their effects can be prevented or modified by BLM decision making.

Let's take an example of a wind farm. Say we have a wind farm proposed to be built on private lands. Now to build the wind farm they need access for road and transmission line across BLM. Now if they have no other reasonable access for that road and transmission line, if they have no other reasonable access, they won't be able to build their wind farm. Therefore, the effects of that wind farm can be prevented by BLM decision making if we don't grant them the right-of-way. In that case, in evaluating the significance of granting them a right-of-way, we would have to count the effects of the right-of-way together with the effects of the building and operation of the wind farm in evaluating significance. With a different set of facts, if they did have other reasonable access, our BLM decision making would not be able to prevent the effects of that wind farm, and in that case we would only evaluate the significance of the granting of the right-of-way itself.

Section 6.5.2.1 in the BLM NEPA Handbook contains three examples explaining connected actions. Section 7.3 in the BLM NEPA Handbook has some examples of when connected actions count toward the significance of a BLM action. For more information on connected

actions, you can also review a Planning/NEPA Forum broadcast on connected actions, which is at the NTC's Knowledge Resource Center.

C. Humphrey: I got a couple of questions about thresholds from the field, and I'll ask those now. Is it necessary to establish thresholds for every resource analyzed in detail, and what are thresholds for significance and how are they established?

K. Bogdan: So to answer the first question, is it necessary to establish thresholds for every resource? Not every time; certainly if you are preparing your categorical exclusion or your environmental assessment, there may be more of a need to establish thresholds related to resources to support whether there is a significant effect on the quality of human environment to trigger an EIS. But once you're in an EIS, the important element now is it's about disclosure. It's about trying to quantify that cumulative effect that could happen with your actions, the alternatives, and in combination with the ongoing actions and reasonably foreseeable future actions.

R. Hardt: Some agencies have chosen to develop explicit thresholds for significance, but BLM hasn't actually defined any thresholds for significance as such, but there are often regulatory thresholds that are very informative in us evaluating at what point do we reach a significant impact, especially thresholds related to air quality and water quality. Take a look at the examples for how we describe thresholds for each issue.