

R. Hardt: In Step 2, describe the effects of past actions within the geographic scope. You must consider past actions regardless of who took the actions that have affected the resource at issue within the geographic scope to provide a context for the cumulative effects analysis. Past actions can usually be described by their aggregate effect without listing or analyzing the effects of individual past actions. There is more information on this in the BLM NEPA Handbook in 6.8.3.4. There is also a lot of good information in the CEQ memorandum on this subject. Typically the aggregate effect of past actions is described in the affected environment section.

You should analyze the effects of individual past actions when such information is necessary to describe the cumulative effect of all past actions combined. Also, information about the effects of individual past actions may be useful in illuminating or predicting direct or indirect effects of a proposed action. The CEQ memorandum talks more about this. For example, if you have something like a proposed motorcycle race in an area in which there have been many previous motorcycle races, the analyses of those past motorcycle races might provide you a good basis for understanding what the impact of this current motorcycle race is going to be.

C. Humphrey: How far back do we need to go in documenting past actions? Do you go back to the ice age?

R. Hardt: Well you have to go back far enough. There's a good NEPA answer for you. You need to go back far enough in a sense to understand what your current condition and trend of the resource is at issue. Now if you're doing an aggregate description of the effects of past actions, it's not really a question of how far back do you go; it's simply understanding how all the past actions have affected the current condition. If you're doing an individual analysis, it really is that action something that you need to understand to be able to explain the current condition. If it's no longer having any effect on the current condition, it might not provide any meaningful information in your cumulative effects analysis.

K. Bogdan: Next you'll see how we describe the past actions for each issue in the examples.