

# DEVELOPING ALTERNATIVES: A NEPA PROTOCOL

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## INTRODUCTION

Developing alternatives is a crucial, and often challenging, part of the project planning process under the National Environmental Policy Act (NEPA). What follows is one tool for systematizing that activity, with the understanding that many other frameworks may exist that can also provide consistency among agencies and between projects.

You will notice that other steps in the NEPA process are essential to completing this one. For example, in the absence of a comprehensive statement of purpose and need, it is not possible to ascertain whether a specific proposed alternative meets that purpose and need; without understanding at least the broad outlines of potential environmental impacts from the proposed action, it is not possible to develop alternatives that avoid or mitigate those impacts.

Therefore, the following protocol presupposes that these other activities have or will take place during alternative development, and provide places to enter appropriate data from other steps in the process.

Section IIA, Background Information, asks for this important data, so it will be available when developing the alternatives in Sections IIB, C, and D.

Section IIB, Action Alternatives, asks the analyst to consider how various factors could alter the proposed action in ways that would avoid or minimize its expected environmental impacts. For example, impacts from the proposed action may be avoided or minimized through mitigation, alternative technologies, change of location or timing, change of scale, and through actions outside the jurisdiction of the agency, or some combination of these alterations. The various alternatives could be displayed in a matrix that shows how the changes reduce the expected environmental impacts of each combination of factors.

Section IIC, No Action, asks the analyst to identify the two main types of No Action alternatives. One may be more appropriate to the specific project; only one No Action alternative is required to be analyzed under NEPA.

Section IID, Environmentally Preferable Alternative, is required only for EISs. The analyst should identify which actions or combinations would best meet the national policy expressed in the National Environmental Policy Act, and describe those in the Record of Decision for the Environmental Impact Statement.

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### **A. Background Information**

1. What is the purpose and need for the project?

2. What is the Proposed Action? (include all connected actions 40 CFR 1508.25(a)(1))
3. What are the Significant Environmental Issues?

**B. Developing Action Alternatives**

1. List the Mitigation Measures for each Affected Resource
2. Describe Technologies or methods other than those proposed that could meet the purpose and need
3. Describe Locations or distribution in space other than those proposed that could meet the purpose and need
4. Describe Schedules or distribution in time other than those proposed that could meet the purpose and need
5. Describe Scales other than those proposed that could meet the purpose and need
6. Describe Actions outside the Agency's Jurisdiction other than those proposed that could meet the purpose and need

**C. Developing the "No Action" Alternative**

1. Describe what would take place if there were no change in the actions now occurring in the project area (i.e., "no new action")
2. Describe what would take place if nothing were to occur in the project area (i.e., "without project")

**D. Developing the Environmentally Preferred Alternative**

1. Describe the Actions that best promote the Nation's environmental policy as stated in Section 101 of the National Environmental Policy Act