

NEPA Introductory Course: Environmental Assessments

Welcome to the National Environmental Policy Act, also known as NEPA Introductory Course on Environmental Assessments provided by the Florida Department of Transportation's or FDOT's Office of Environmental Management. To begin, select the start button or press Shift+N on your computer.

This training is part of a series of introductory courses that provide guidance on FDOT's process for complying with NEPA, called Project Development and Environment or PD&E. Please see the NEPA Introductory Course Catalog for other computer based trainings in this series and the recommended order in which they should be taken. Several of these trainings are referenced throughout this CBT. A link the course catalog can be found on the resources page.

The environmental review, consultation, and other actions required by applicable federal environmental laws described in this training are carried out by FDOT pursuant to 23 U.S.C. Section 327 and a Memorandum of Understanding dated December 14, 2016, executed by the Federal Highway Administration and FDOT.

The purpose of this course is to provide instruction on preparing Environmental Assessments as described in Part 1, Chapter 6 of the PD&E Manual. Please note you may pause this training at any time.

This training will have six lessons:

- Lesson 1 will provide the basics on Environmental Assessments, referred to as EAs throughout this training.
- Lesson 2 will discuss pre-PD& E activities for an EA
- Lesson 3 will outline typical PD&E activities for an EA
- Lesson 4 will provide guidance on how to prepare the EA document
- Lesson 5 will provide an overview of the EA review process.
- And Lesson 6 will discuss the possible outcomes of an EA.

First, in lesson 1 we'll go over the Environmental Assessment Basics.

Guidance on EAs is provided in Part 1, Chapter 6 of the PD&E Manual. You may want to have this chapter handy as you go through this training. This chapter is available on FDOT's Office of Environmental Management Office or OEM's website. The link can also connect you to other chapters of the PD&E Manual that are referenced throughout this training. This link can be found on the Resources page.

The determination of which Class of Action is appropriate for your project is based on the significance of environmental impacts. Significance is identified by the District, but the final determination is made by OEM. Class of action determination is discussed in detail in Part 1, Chapter 2 of the PD&E Manual and the computer based NEPA Introductory Course: Class of Action.

EAs are defined in Title 23 CFR Section 771.115 as Class 3 actions in which the significance of the environmental impact is not clearly established. So, basically an EA is prepared when the significance of impacts is not known.

The CFR also states that all actions that are not Environmental Impact Statements (Class 1) or Categorical Exclusions (Class 2) are EAs, and all actions in this class require the preparation of an EA to determine the appropriate environmental documentation required.

Actions that are classified as Categorical Exclusions are discussed in Part 1, Chapter 2 of the PD&E Manual as well as the computer based training - NEPA Introductory Course: Categorical Exclusions. Environmental Impact Statements are discussed in Part 1, Chapter 8 of the PD&E Manual and the computer based training- NEPA Introductory Course: Environmental Impact Statement Overview and the Draft Environmental Impact Statement.

The EA Class of Action can be determined during any of the following activities:

- During Statewide Acceleration Transformation, or SWAT team meetings,
- Efficient Transportation Decision Making Screenings,
- or later, during the PD&E phase.

We will go into more detail on each of these later in this training.

In lesson 2 we will discuss project activities that take place before preparing an EA.

The Statewide Acceleration Transformation, or SWAT (*say "swat"*) process is a project management technique implemented to streamline the Project delivery process through early coordination and communication between the different FDOT functional disciplines.

It begins with the SWAT Planning Meeting wherein projects are first discussed. At this meeting, it is determined if a project will be state funded only or if the project will use federal funds. At this point, a preliminary Class of Action may be determined.

After the Planning Meeting, a SWAT Kickoff Meeting is conducted for each Project and participants recommend appropriate pre-PD&E activities.

Guidance on the SWAT process is provided in Part 1, Chapter 4 of the PD&E Manual, and in the computer based training -NEPA Introductory Course: Project Development Process.

Another Pre-PD&E action is the Efficient Transportation Decision Making, or ETDM process, which provides agencies and other stakeholders the opportunity for early input and consideration of the environment in FDOT transportation planning.

In the ETDM process, interaction is accomplished through an Environmental Technical Advisory Team, or ETAT (*say "E-tat."*). ETAT members use the Environmental Screening Tool, or EST to review project information, review preliminary alternatives, identify potential project effects, and submit comments to FDOT.

There are two ETDM screening events in the EST: The Planning Screen and the Programming Screen. FDOT uses information obtained during the screening events to focus on the issues that should be addressed during the PD&E phase. If at the finalization of the Programming Screen, there are questions on the significance regarding environmental impacts from the proposed project, an EA

class of action may be determined. More detailed information on this process can be found in FDOT's ETDM Manual. A link to this manual can be found on the resources page of this CBT.

As you move into the PD&E phase, it is important to review the Final Programming Screen Summary Report to identify preliminary information on the Project purpose and need, the Planning consistency status, environmental issues and concerns, ETAT comments on the project, environmental studies or reports that are needed for the project, the types of permits that may be needed, and relevant issues for analysis.

Another pre-PD&E activity is the preparation of an Advance Notification or AN . The AN is required for EAs to satisfy intergovernmental coordination and review requirements for federal projects. It is a package of documents that is distributed at the initiation of the Programming screen, or later, just before the project enters the PD&E phase. The project schedule will determine when the AN is distributed.

Additional information about the AN is provided in Part 1, Chapter 3 of the PD&E Manual, as well as in the computer based training - NEPA Introductory Course: Preliminary Environmental Discussion and Advance Notification.

Generally, consultants conduct the PD&E studies for FDOT. In order to ensure that the appropriate type of studies and supporting documentation are provided, FDOT develops a PD&E scope of service for the consultant effort required.

Development of a preliminary PD&E scope of services begins during the SWAT Kickoff Meeting and may use information from the ETDM planning screening. After the project goes through the ETDM programming screen, it can be further developed and refined for the PD&E Study. The scope of services focuses the project activities to issues that have a potential to impact the project and actions needed during the PD&E phase to avoid, minimize or mitigate project's potential impacts.

FDOT has developed Standard Scopes of Services for procuring PD&E services and guidelines for estimating and negotiating staff hours. The standard scope of Service template for an EA is available using the PD&E Study Standard Scope of Services Development Tool available through the StateWide Environmental Project Tracker, also called SWEPT. A link to SWEPT can be found on the resources page.

More information on preparing a PD&E scope of services can be found in Part 1, Chapter 4 of the PD&E Manual and the computer based training- NEPA Introductory Course: Project Development Process.

In lesson 3 we will outline the activities that take place during the PD&E phase for an EA.

One of the major components of the PD&E phase is the implementation of a Public Involvement Plan. Guidance on this topic can be found in Part 1, Chapter 11 of the PD&E Manual. OEM also offers

Public Involvement Trainings. OEM's training schedule is provided on its website. A link to this site can be found on the resources page.

One of the outcomes of the Public Involvement Plan, and a major milestone of an EA, is the Public Hearing. A public hearing is required for EAs if they qualify as a major transportation improvement pursuant to Section 339.115(b) of the Florida Statutes. Major transportation improvements are identified as 1) projects that will increase the capacity of a facility through the addition of new lanes; 2) provide new access to a limited or controlled access facility; or 3) include construction of a facility in a new location.

During the PD&E Phase for an EA, engineering analysis, alternatives analysis, and environmental analysis is conducted as described in Part 2 of the PD&E Manual. Also, during this phase project impacts are assessed, consultation with resource agencies takes place, and technical reports are completed.

The results of this coordination, analysis and the technical reports are summarized in a document called an Environmental Assessment and documented in the Project File. The project file is maintained electronically in SWEPT.

Chapters in Part 2 of the PD&E Manual detail how to conduct the environmental and engineering analysis. Many of the PD&E manual chapters in Part 2 also have associated computer based NEPA Introductory Courses. See the NEPA Introductory Course Catalog for a listing and links to these trainings.

The chapters in Part 2 of the PD&E Manual provide guidance for each environmental resource or issue listed here. They fall under the categories of Social and Economic, Cultural, Natural, and Physical. We will discuss each of these in more detail later in this training.

In lesson 4 we will provide guidance on how to prepare the EA as the Environmental Document.

Once the engineering analysis and impact assessments have been completed, the EA is prepared. It is prepared by the District in consultation with OEM and includes agency and public coordination.

It should be a concise document focused on relevant issues or resources where the significance of impacts is in question. The EA should provide sufficient information and analysis for determining whether to prepare either a Finding of No Significant Impact, if there are no anticipated significant impacts, or an Environmental Impact Statement, referred to as an EIS if impacts are going to be significant.

The preparation of an EA aids in compliance with NEPA and other applicable federal environmental laws, regulations, and Executive Orders when an EIS is not necessary. If an EA is being prepared

and it becomes apparent that an EIS is necessary, the information from the EA is then used to facilitate the preparation of an EIS as the Environmental Document.

The EA preparer should refer to the comments submitted from the ETAT during the ETDM process and identify any concerns or issues raised. This information should then be used to determine the content of the EA. In preparing an EA, it is important to convey information using high quality maps and exhibits, incorporate supporting documentation (such as technical reports) by reference, and summarize background data and analysis.

Shown here is the EA cover page, which is prepared in the StateWide Environmental Project Tracker, or SWEPT. The cover page includes basic project information such as the project name and any cooperating agencies. Cooperating agencies are those agencies that have legal or jurisdiction requirements tied to the preparation of the EA. The cover page also includes the project numbers, the project location, and a brief description of the project.

It should be noted that the cover page includes the following required statement: *The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by FDOT pursuant to title 23 U.S.C. section 327 and a Memorandum of Understanding dated December 14, 2016, and executed by FHWA and FDOT.*

Once the EA is approved for Public Notice, the Director of the Office of Environmental Management signs the cover page in SWEPT. Also included is the contact information for the project contact persons at the District and OEM at the bottom of the cover sheet as shown.

As mentioned earlier, this cover page is an FDOT form that is prepared in SWEPT. A sample of the form is shown as a figure in the EA chapter of the PD&E Manual and is available from FDOT's Policy and Process Management Unit website which can be found on the resource page of this CBT.

If the EA includes a Draft Section 4(f) Evaluation for any properties protected under 49 USC 303, a different form is used to prepare the cover page. This cover page is also prepared in SWEPT and a sample of the form is available in the chapter and from FDOT's Policy and Process Management Unit website.

The Table of Contents of the EA document includes six major sections. Shown here on the first page of the Table of Contents are Project Description and Purpose and Need; Alternatives; Environmental Analysis; and Comments and Coordination.

The first major section of the EA is the Project Description and Purpose and Need section. This information is developed early in the planning process, but may evolve until it is finalized in the PD&E Study.

The Project description and purpose and need is developed by first reviewing what was included in the ETDM Screenings and refining it as necessary to prepare this section of the EA. This section of the EA should also include information demonstrating the project's fulfillment of planning consistency requirements.

Additional information and guidance on preparing this section can be found in Part 2, Chapter 1 of the PD&E Manual, as well as the computer based training- NEPA Introductory Course: Project Description and Purpose and Need.

The next section of the EA titled “Alternatives” should include information regarding the engineering analysis conducted, considerations concerning evaluation of existing conditions, selection of design parameters, development and analysis of alternatives, selection of a Recommended Alternative, and documentation.

The EA does not need to evaluate in detail all reasonable alternatives for the project. The EA may be prepared for one or more viable build alternatives and must evaluate a No-Action alternative. Additionally, any alternative considered but eliminated prior to preparation of the EA should be discussed and the reasons for its elimination documented. Further guidance on preparing this section of the EA can be found in Part 2, Chapter 3 of the PD&E Manual, and the computer based training - NEPA Introductory Course: Engineering Analysis.

The Alternatives section is divided up into subsections including:

- Alternatives Development
- Alternatives Considered but Eliminated
- Alternatives Considered for Additional Study
- Comparative Alternatives Evaluation
- And, Recommended Alternative.

Guidance on what information to include in each of these subsections is provided in Part 2, Chapter 3 of the PD&E Manual.

The next section of the EA titled “Environmental Analysis” discusses existing conditions of the project area, identifies the impacts of the proposed alternatives and provides the actual impact determinations for each applicable issue or resource, as well as any enhancements. This should include any known proposed drainage areas and pond sites. There are three types of impacts: direct, indirect, and if applicable, cumulative impacts.

The level of analysis for resources at issue should be sufficient to adequately identify the impacts and address comments provided by the ETAT, other agencies, interested parties, or the public during the Programming screen and/or the Advance Notification (AN) process.

The analysis should also fulfill the resource agency consultative processes, address opportunities and approaches to mitigation when needed, and aid in coordination with the public or other interested stakeholders. The Environmental Analysis Section should also provide sufficient detail to support the conclusions and scientific and analytic basis for the comparison of alternatives.

The subsections of the Environmental Analysis sections are determined based on the issues and resources affected by the project, and based on applicable federal laws, regulations, and Executive Orders.

Guidance for preparing each of these subsections is provided in the applicable chapter in Part 2 of the PD&E Manual and in computer based NEPA Introductory Course trainings. See the NEPA Introductory Course Catalog for available CBTs in this series.

Shown here is a Table from Part 1, Chapter 6 of the PD&E Manual, which provides guidance on where to find information to prepare each Environmental Analysis subsection. This table lists issues and resources and their corresponding chapters in Part 2 of the PD&E Manual where guidance can be found for each resource or issue. For example, information on how to do the analysis for and prepare the Wild and Scenic Rivers subsection is provided in Part 2, Chapter 12.

As discussed, Part 2 of the PD&E Manual provides guidance on the following resource areas and issues:

- Social and Economic

- Cultural
- Natural
- And Physical

Social and Economic issues include Sociocultural Effects, Aesthetics, and Farmlands. Cultural resources include Section 4(f) Resources and Archaeological and Historic Resources.

Natural resources include:

- Wetlands and Other Surface Waters
- Aquatic Preserves and Outstanding Florida Waters
- Water Quality and Water Quantity
- Wild and Scenic Rivers
- Floodplains
- Coastal Zone Consistency
- Coastal Barrier Resources
- Protected Species and Habitat
- And, Essential Fish Habitat

Physical resources include:

- Highway traffic noise
- Air quality
- Contamination and
- Utilities and Railroads

Each subsection within the Environmental Analysis section should describe the potential impacts of the proposed project on that issue or resource for each alternative evaluated. The subsection should also discuss any enhancements and identify potential benefits to the applicable issue or Resource. It is recommended that charts, tables, maps, and other graphics illustrating comparisons between the alternatives and their impacts be used.

If there is no involvement with, or impact to the issue or resource, the applicable Part 2 chapter often provides standard statements to include in the subsection. The preparer should include agency coordination and concurrence letters in the project file and the Appendix of the EA.

It is recommended that the preparer have these concurrence letters, as applicable to the project resources, before the public hearing to ensure the public is informed of agency coordination and input:

- State Historic Preservation Officer determination of eligibility letter
- US Fish and Wildlife Service informal consultation letter
- Section 4(f) determination of applicability
- Environmental Protection Agency sole source aquifer letter

The Anticipated Permit Subsection of the Environmental Analysis section is not based on an issue or resource like the others, instead it basically lists the anticipated environmental permits that through analysis have been determined to be needed for the project. The completion of this subsection requires coordination with the District Permit Coordinator.

This subsection should list the anticipated permits identified during the PD&E Study, include the name of the permit, the name of the permitting agency, and the permit status. Documentation of coordination with regulatory agencies should be added to the project file. This could be letters, emails, or other correspondence. Guidance on Environmental Permits that may be needed for a project is provided in Part 1, Chapter 12 of the PD&E Manual.

After the Environmental Analysis section comes the Comments and Coordination section. It summarizes the public and interagency comments and coordination involved in developing the EA. It also includes early comments received during the AN or if combined, during the ETDM Programming Screen, as well as documentation of meetings and coordination with government leaders, government agencies, community groups and individual citizens.

Within the Comments and Coordination section of the EA, there should be subsections for discussion of the Efficient Transportation Decision Making Programming Screen and Advance Notification; coordination and consultation with stakeholders, and a concluding Statement.

The subsection, "Discussion of ETDM Programming Screen and Advance Notification", serves to reference or summarize the comments received during the Advance Notification, or AN. If the AN is combined with the ETDM Programming Screen, the ETDM Programming Screen is referenced in this subsection. Please note, the ETDM Programming Screen Summary Report should not be included in the EA.

The Discussion of the ETDM Programming Screen and Advance Notification subsection should include the date of the AN distribution, or if combined with the ETDM Programming Screen, the screening date; a list of federal, state, and local agencies, and other interested parties that provided comments; and, a reference to relevant comments on the project and District responses. When discussing agency comments, reference the appropriate section where comments and District responses can be located.

Coordination and consultation with agencies, the public, and other interested parties during preparation of the EA is summarized in the next subsection titled "Coordination and Consultation". This summary should include a chronology of meetings, events, attendees, comments received, and District responses to the comments. This section may be exhibited as a table for ease of reference.

The last subsection titled "Concluding Statement" consists of a standard concluding statement that is used for all EAs. It states: "*FDOT will not make a final decision on the proposed action or any*

alternative until a public hearing or the opportunity for a public hearing has been provided for on this project and comments received have been taken into consideration.”

After the Comments and Coordination section comes a Commitments section. It provides a list of all commitments made during the PD&E process and identified in associated technical reports. It is important that any commitments in this section of the EA being carried over from technical reports be worded exactly as they appear in the technical report. This ensures the intent of the commitment remains intact.

Guidance on preparing and documenting commitments is available from Part 2, Chapter 22 of the PD&E Manual and the computer based training -NEPA Introductory Course: Commitments.

The Appendix is the last section of the EA and includes documents which are necessary to the significance finding. This may include concurrence letters, determinations of effect, Memoranda of Understanding, and Referendums. The appendix also includes correspondence from agencies, elected or appointed officials, statewide and regional clearinghouses, cooperating agencies, citizens and citizen groups, and private interest groups.

The EA Appendix should include a divider page that lists all documents in the Appendix. These documents must be numbered, but the organization of letters is up to the preparer. The preparer may choose to group letters by government type, stakeholder, chronology, or another logical organization based on the issues associated with the project.

The Appendix should not include materials that do not support the significance finding such as internal memos, letters between FDOT and its consultant, comments on draft documents, or ETDM planning or Programming Screen Summary Reports. Support materials under a separate cover, such as technical reports, technical memoranda, and studies, should be *referenced* in the EA and included in the project file.

In lesson 5 we will provide an overview of the EA review process.

This diagram shows an overview of the EA review process up to document approval. Once the EA is prepared and the District has done their quality control review, the District submits the EA to OEM and cooperating agencies for review. OEM will then send it to the legal office for review. The District then updates the document based on comments and resubmits for OEM and Legal Office approval.

Now let's get into more detail on this review process. The District should complete an Environmental Document Submittal Form in the State-Wide Environmental Project Tracker or SWEPT before submitting the EA to OEM. Like the cover page, a sample of this form is available from FDOT's Policy and Process Management Unit website.

Then the District should submit the Environmental Assessment using FDOT's Electronic Review Comments system or ERC . Detailed guidance on the OEM review process, including legal review for EAs can be found in Part 1, Chapter 6 of the PD&E Manual, as well as the computer based training- NEPA Assignment: Part 2 - OEM NEPA Review Process for District Practitioners.

The District should submit the EA to agencies identified as Cooperating Agencies for the project through the EST at the same time it is submitted to OEM. Remember those cooperating agencies are those that have legal or jurisdiction requirements tied to the preparation of the EA.

Here we show an overview of the process after document approval. Once comments from the submittal are resolved and OEM approves the EA, it is distributed to agencies and stakeholders, and published in one or more local newspapers. Then the public hearing is held, if applicable.

After OEM approves the EA, the District transmits it to interested parties and agencies primarily through the EST .

The District also publishes a notice in one or more local newspapers. This notice is typically combined with the public hearing notice, and lists where the EA is available to the public for review, such as libraries or the District Office. The EA must be made available for public review 21 days prior to the public hearing. This review period is included in the 30-day comment period for the EA.

You have now completed the NEPA Introductory Course titled Environmental Impact Statement Overview and the Draft Environmental Impact Statement. Please select the button to take the quiz. You must score with an 80% to pass. Good luck! Thank you for your time and attention.