EMO Assessment Form and Alternatives Analysis

Assessment Form

- Is based on US Army Corps Statement of Findings (SOF)
- Coalesced from SOF, checklist, permit application, and previous assessment form
- Guide for General Permit preparation (at this time)



Alternatives Analysis

- Alternatives analysis is a part of the Corps regulatory requirements (Section 404(b)(1) Part 230.10)
- Each alternative documented in the SOF
- Ensures options having less impacts to Waters of the US have been considered and evaluated

Alternatives Analysis

- Ensures selected alternative equals Least Environmental Damaging Practicable Alternative (LEDPA)
 - Part 230.3(q) The term practicable means available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.
- Incorporate cost, existing technology, and logistic evaluations into each alternative





Alternatives vs Avoidance

- Analysis is the macro view
- Avoidance and minimization is the micro view
- Avoidance and minimization applies to the selected alternative
 - Demonstrates measures taken to avoid and reduce impacts
 - Reduces need for additional mitigation

Alternatives vs Avoidance

AA Examples

- Relocating road to avoid waters of US
- Shifting an alignment to avoid waters of US
- Evaluate various routes for new alignment

A&M Examples

- Tightening shoulder slopes
- Reducing median widths (can be tied to alignment)
- Reducing pipe extension lengths

How Do We Improve

- Recognize importance of AA and A&M
- Coordinate-NEPA/permitting Managers
- Document, document, document
- Take credit for measures already used
 - Slope reduction
 - Reduced pipe and riprap lengths
 - Cleaning versus reshaping
- Ask questions