

Part 610 – National Environmental Compliance Handbook

Subpart H – Exhibits

610.123 Ten-Step Approach to Integrating NEPA with Special Environmental Concerns

Ten-Step Approach to Integrating NEPA with Special Environmental Concerns

1. Conduct preliminary constraint analysis to identify potentially related environmental requirements. **The NRCS environmental evaluation (EE) should provide the necessary information to satisfy this initial step.**
 - a) Develop a project description that is as stable as possible.
 - b) Conduct a preliminary site evaluation and begin any necessary coordination.
 - c) Develop a list of regulatory and permitting requirements.
2. Consult with regulatory agencies to—
 - a) Confirm their jurisdiction over the proposed action and commitment to cooperate in an integrated NEPA process.
 - b) Learn the specific steps in their review process.
 - c) Determine the scope of any necessary technical studies.
 - d) Agree on an integrated processing and review schedule.
3. Develop a comprehensive environmental compliance strategy that—
 - a) Explains the major steps in each federal agency’s review process.
 - b) Identifies parallel steps and common technical study requirements.
 - c) Contains a master schedule for integrated environmental review.
 - d) Identifies responsible individuals within the lead agency/consulting firm staff.
4. Draft and sign any necessary memoranda of understanding. Spell out each agency’s roles and responsibilities, timing, and conflict resolution strategies.
5. Conduct all necessary reviews and technical studies.
 - a) If agencies cannot act collaboratively, each agency should ensure that studies meet the unique protocol requirements of all regulatory agencies.
6. Consolidate results into the draft NEPA document.
 - a) Lead agency reviews and evaluates results for consistency.
 - b) Resolve conflicts through further consultation and negotiation. If no consensus is reached, conflicting views should be presented in the draft.
 - c) Ideally, all consultation activities should be complete before publishing the draft NEPA document, however, NEPA allows consultation (NHPA, ESA, etc.) to “catch up” with the NEPA process before the final document is complete and the decision is made.
7. Conduct coordinated public and interagency review.
 - a) Make draft NEPA document available for public review and interagency consultation.
 - b) Conduct any additional scoping and public participation planning.
8. Incorporate the results of any late studies into the final NEPA document
 - a) Includes completed section 106 consultation for NHPA, concurrence from the Services, requirements of the 404 permit from the Corps, etc.
 - b) If any of this information changes the “significance” conclusions in the NEPA document, a supplement (see subpart F) may need to be prepared and a new public review should be conducted.
9. Adopt the consolidated NEPA document.
10. Ensure that individual Federal agencies use the NEPA document in their regulatory decisions.