# Environmental Narrative Requirements

*All Applicants for Construction Assistance must provide all required environmental information in order for an application to be considered complete.*

The National Environmental Policy Act (NEPA) requires Federal agencies to assess the expected environmental impacts associated with proposed federal actions. Per EDA Directive 17.02-2, EDA must ensure that “proper environmental review of program activities takes place, that there is a proper balance between the goals of economic development and environmental enhancement, and that adverse environmental impacts are mitigated or avoided to the extent possible”.

In order to comply with NEPA requirements, the applicant must submit, in its application package, information detailing the present environmental condition of the project area and how the project will impact environmental resources in and around the project area.

The Applicant must provide detailed, comprehensive information for the:

1. site(s) where the proposed project facilities will be constructed and the surrounding areas affected by its operation; and
2. areas to be affected by any primary beneficiaries of the project.

The information submitted must be sufficient to evaluate all reasonable alternatives to the proposed project, the direct and indirect environmental impacts, as well as the cumulative impacts on the environment as defined in the Council on Environmental Quality (CEQ) regulations for implementing NEPA set out at 40 C.F.R. 1500-1508. The level of detail should be commensurate with the complexity and size of the project, and the magnitude of the expected impact. Relevant, recently completed environmental impact documentation (assessments, impact statements, etc.) for activities in the region in which the proposed project will be located may be included along with the environmental narrative.

Applicants must provide information on all the items identified below in their application for EDA assistance. Applicants must provide a detailed explanation for any area in which the applicant asserts that an item is not applicable to a project. Applicants are encouraged to contact their designated Economic Development Representative or the applicable EDA Regional Environmental Officer with questions (please see the EDA website for contact information).

Several issues discussed in the environmental narrative below may require consultation with other State or Federal agencies before EDA’s final approval of an award (for example, the State Historic Preservation Agency or the U.S. Fish and Wildlife Service). **While EDA does not require that applicants complete such consultations before submitting an application, applicants should be aware that in the event their project is selected for funding, the applicant will be expected to proceed with consultations in an expeditious manner. EDA expects applicants to be prepared to submit all required information to the appropriate agencies upon receipt of a Non-Binding Commitment letter.**

**APLLICANTS MUST PROVIDE INFORMATION ON THE FOLLOWING ITEMS IN THE ENVIRONMENTAL NARRATIVE:**

*Note: Applicants must provide all information requested below. Although EDA strongly recommends following the format of this template, other formats will be accepted provided that the narrative contains all required information.*

## BENEFICIARIES

Identify any existing businesses or major developments that will benefit from the proposed project, and those that will expand or locate in the area because of the project.

## PROJECT DESCRIPTION

### Proposed Construction

Describe the project construction components in detailed, quantifiable terms. Describe the project location, proposed construction methods, and schedule. Summarize the environmental resources that would be impacted by the project. See the mock example below for the level of specificity expected by EDA:

*The City of \_\_\_\_\_\_\_\_\_\_\_\_\_\_ is proposing to construct a 30-inch (in) water line which would be constructed within an existing 50-foot City of \_\_\_\_\_\_\_\_\_\_ right-of-way (ROW) and measure 1,220 linear feet (lf). The project is located within Township 39N, Range 10E, Section 24 in the City of \_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_ County, [[[State]]]. The project would be constructed over a three-month period from April June 2011. Construction of this project would entail trenching a 1 ft wide by 3 ft. deep ditch and installing the 30‑in. pipe within the existing ROW. Total land disturbance will be 2.1 acres.*

*The construction staging area would be located entirely within the existing ROW. Best Management Practices (BMP) would be implemented including the installation of straw bales and silt fences to minimize impacts to storm water. Construction would only occur from 7 am-5 pm to minimize noise impacts in the project areas. Minor maintenance would occur during the operation of the waterline, but would not entail any ground disturbing activities. The waterline would bisect a palustrine emergent wetland in two places and result in the impact of 0.10 acre of wetland.*

As an exhibit to this Narrative, provide a topographical map of the project area and a site map (with legends) displaying the project location and boundaries, existing and proposed project components and location of all sites and/or companies benefiting from the proposed project. The documents should be of sufficient clarity for adequate interpretation of the Applicant’s intentions.

### Alternative to the Proposed Project

Provide a detailed description of alternative actions that were considered during the project planning but were not selected (e.g., alternative locations, designs, other projects having similar benefits, or a “no project” alternative). Explain why this project/site was selected as the preferred alternative with respect to other choices. Provide detail on why others alternatives were rejected (e.g. did not meet the purpose and need of the project, implicated more environmental impacts than the proposed action).

### Mitigation

Describe methods to be employed to reduce adverse impacts from construction, such as noise, dust generation, soil erosion, and siltation. List all mitigation measures that would be implemented to minimize impacts to environmental resources from project implementation.

## HISTORIC/ARCHEOLOGICAL RESOURCES

Identify any known historic/archeological resources within the project site(s) or area of potential effect that are either listed on the National Register of Historic Places or considered to be of local or State significance and perhaps eligible for listing on the National Register. Discuss the potential impacts of the project on culturally significant resources and provide a determination as to whether there will be: no historical properties/culture resources present; no historical properties/culture resources adversely affected; or historical properties/culture resources adversely impacted.

Provide a list of Tribal Historic Preservation Officers (THPO), Tribal Leaders, and other interested parties to be consulted with, as well as any comments already obtained from these parties. This can be obtained from the State Historic Preservation Officer (SHPO), Native American organizations, or online. The National Association of Tribal Historic Preservation Officers maintains a database of currently recognized THPOs. In addition, the Advisory Council on Historic Preservation (ACHP) and the National Park Service both has information on THPOs.

Applicants will be required to provide the relevant SHPO with information about the project and request that the SHPO submit comments on the proposed project to the appropriate EDA Regional Office **prior to final approval** of any award. **Note that the applicant is not required to contact the SHPO until directed to do so by EDA**. If comments from the SHPO have already been received, they should be attached along with copies of the information provided to the SHPO. The following information will be required for the SHPO to review the project:

* 1. a narrative description of the project’s elements and its location;
	2. a map of the area surrounding the project, which identifies the project site, adjacent streets and other identifiable objects, and the Area of Potential Effect;
	3. line drawings or sketches of the project;
	4. photographs of the affected properties if building demolition or renovation is involved; and
	5. an archeological survey and report if one has been prepared.

## AFFECTED ENVIRONMENT

For the resource areas identified below, indicate potential direct, indirect, and cumulative impacts from proposed project activities and specify proposed measures to mitigate probable impacts.

### Affected Area

Describe the general project area, including topography, historic land usages, unique geological features, and economic history. Provide site photographs if available.

### Shorelines, Estuaries, Beaches and Dunes

Identify any shorelines, beaches, dunes, or estuaries within or adjacent to the project site(s). Indicate whether the project is located within a designated coastal zone subject to the Coastal Zone Management Act. Information on coastal zone boundaries is available on the National Oceanic and Atmospheric Administration’s (NOAA) website at [www.noaa.gov](http://www.noaa.gov). Also indicate if there are any proposed overwater structures that could impact navigable waters.

### Wetlands

Identify any wetlands within or adjacent to the project site(s). If available, provide an on-site wetland/waters delineation performed in accordance with the 1987 (or current version) U.S. Army Corps of Engineers Wetland Delineation Manual, as amended. If the delineation has received a preliminary or final Jurisdictional Determination from the U.S. Army Corps of Engineers (USACE), please provide the determination. Provide a determination of effects including the amount of jurisdictional waters affected by type (e.g. 1.1 acres of palustrine emergent wetlands would be impacted by the proposed project).

If wetlands, streams, or navigable waters may be impacted, it is recommended that Applicants contact USACE concerning any jurisdictional waters resources. Include any correspondence or comments from USACE related to the project’s impacts as an exhibit to the environmental narrative as part of the application for EDA assistance.

### Floodplains

Provide a FEMA floodplain map (with the map number and effective date) displaying the project location and boundaries, existing and proposed project components, and location of all sites and/or companies benefiting from the proposed project. The document should be of sufficient clarity for adequate interpretation of the applicant’s intentions. Floodplain maps can be viewed and printed from FEMA’s website at [www.fema.gov](http://www.fema.gov). If FEMA floodplain maps do not exist in the project area, provide a letter from a Professional Engineer regarding the presence or absence of a 100-year flood plain. The narrative should also indicate whether the Applicant’s community participates in the National Flood Plain Insurance Program.

### Vegetation and Wildlife Resources

Identify native vegetation and wildlife found in the project area or its immediate vicinity. Describe the amount and type of vegetation in the project area and indicate the impact to vegetation if removed (e.g., 1.2 acres of early successional native hardwood forest).

Identify any designated State and National Parks, National Wildlife Refuges, or National Game Preserves located on or in the vicinity of the proposed project activities.

Identify any Wilderness Areas, as designated or proposed under the Wilderness Act, or wild or scenic rivers, as designated or proposed under the Wild and Scenic Rivers Act, that are located on or in the vicinity of the proposed project activities.

### Endangered Species

Provide a list of all threatened, endangered, and candidate species located in the project area and its immediate vicinity. Identify these species’ potential or existing habitat, and critical habitat designations in the project area. Critical habitat designations and lists of protected species by county are generally available on the U.S. Fish and Wildlife Services (USFWS) website. If an Effect Determination or Biological Assessment has been completed for any of the species listed, please provide them. Applicants may refer to the most recent USFWW Endangered Species Consultation Handbook for effect determination definitions.

Applicants should include any correspondence with the USFWS that exists related to their proposal for EDA investment assistance as an exhibit to the Environmental Narrative. For projects with possible impacts to marine/coastal species, provide and correspondence with the National Marine Fisheries Service (NMFS).

### Land Use and Zoning

Describe the present formal zoning designation and current land use of the specific project site and adjacent land parcels. The areas include: the site of construction activities, adjacent areas, and areas affected by the primary beneficiaries. Land uses to be considered include, but are not limited to, industrial, commercial, residential, agriculture, recreational, woodlands, mines/quarries, and open spaces. Please indicate if the project is located entirely within a city limit.

Identify agriculture land parcels designated as “prime/unique agriculture lands” by the U.S. Department of Agriculture (USDA) under the Federal Farmlands Protection Act or a local equivalent. Additional information may be found at the USDA’s Natural Resources Conservation Service website.

### Solid Waste Management

Indicate the types and quantities of solid wastes to be produced by the project facilities and primary beneficiary. Describe local solid waste collection and disposal methods and the expected useful life of the disposal facility.

Indicate if recycling or resource recovery programs are currently being use or will be used in the future.

### Hazardous or Toxic Substances

Describe any toxic, hazardous, or radioactive substances that will be utilized or produced by the proposed project facilities and primary beneficiaries.

Describe the manner in which these substances will be stored, used, or disposed.

Complete and sign one “Applicant Certification Clause” for each co-applicant (see Appendix A).

If a recent Phase I or Phase II Environmental Site Assessment has been performed, please provide a copy.

### Water Resources

Describe surface and underground water resources at or near the project site(s) and any impacts of the project to these. If groundwater will be used, is the aquifer in overdraft and /or adjudicated? If there will be discharges to surface water, is the receiving surface water body listed on the U.S. Environmental Protection Agency’s (EPA) Section 303(d) list of impaired waters? Is a National Pollution Discharge Elimination System (NPDES) permit required for any discharges to surface waters? Indicate if the proposed project is located within an area mapped by the EPA as sole source aquifer recharge area (maps and further information are available on EPA’s website at [www.epa.gov](http://www.epa.gov)). Describe any induced changes in local surface water runoff patterns, and the status of storm water discharge permit processes (if applicable).

### Water Supply and Distribution System

Indicate the source, quality, and supply capacity of local domestic and industrial/commercial water resources, and the amount of water that project facilities and primary beneficiaries are expected to utilize. Applicants should note whether the water that is being supplied is in compliance with the Safe Drinking Water Act, and if not, what steps are being taken to ensure compliance.

### Wastewater Collection and Treatment Facilities

Describe all domestic class or process wastewater or other discharges associated with the project facilities and its primary beneficiaries, and the expected composition and quantities to be discharged either to a municipal system or to the local environment.

Describe the wastewater treatment facilities available for processing the additional effluent and indicate their design capacities and current loading (both daily average and peak), and their adequacy in terms of degree and type of treatment required. Indicate all discharges that will require on-site pre-treatment. Applicants should note whether the wastewater treatment plant is in violation of the Clean Water Act, and if so, what steps are being taken to ensure compliance. If local treatment and sewer systems are or will be inadequate or overloaded, describe the steps being taken for necessary improvements and their completion dates.

### Environmental Justice (Executive Order 12898)

Applicants should describe whether the proposed project will result in disproportionate adverse human health or environmental impacts relative to minority and low income populations. Sufficient detail should be provided to enable EDA to determine whether the project will comply with Executive Order 12898.

### Transportation (Streets, Traffic and Parking)

Briefly describe the local street/road system serving the project site(s) and describe any new traffic patterns that may arise because of the project. Indicate if land use in the vicinity, such as residential, hospital, school, or recreational, will be affected by these new traffic patterns.

Indicate if any existing capacities of these transportation facilities will be exceeded as a direct or indirect result of this project implementation, particularly in terms of car and truck traffic, and what the new Level of Service designation will be.

### Air Quality

Indicate types and quantities of air emissions (including odors) to be produced by the project facilities and its primary beneficiaries, and any measures proposed to mitigate adverse impacts. Indicate the impact that the project would have on greenhouse gas emissions.

Is the proposed project site classified as a “non-attainment” area for any criteria pollutants? If so, what are those pollutants? Indicate any local topographical or meteorological conditions that hinder the dispersal of air emissions.

### Noise Pollution

Will operation of project facilities or primary beneficiaries’ facilities increase local ambient noise levels? If yes, indicate the estimated levels of increase, and the areas and sensitive receptors (e.g., residences) to be affected.

### Permits

Identify any Federal, State, or local permits of an environmental nature needed for the project (e.g., USACE, US Environmental Protection Agency (EPA), Coastal Zone Management/Shoreline Management, Air Quality, State Environmental Policy Act, NPDES, etc.) and the status of any such permits. Attach copies of any such permits and all associated correspondence, including the permit applications.

### Public Notification/Controversy

Provide evidence of the community’s awareness of the project, such as newspaper articles or public notification and/or public meetings, as applicable.

If a formal public hearing has been held, attach a copy of the transcript.

Fully describe any public controversy or objections which have been made concerning this proposed project and discuss steps taken to resolve such objections.

### Direct, Indirect, and Cumulative Effects

Please list projects (public and private) that have occurred or will occur in the past, present, and future in and around the project area that could result in significant cumulative or indirect impacts when considered in aggregate with the proposed EDA project. Cumulative impacts result from the incremental impacts of a proposed action when added to other past, present and reasonable foreseeable future actions (40 C.F.R. Section 1508.7). Indirect impacts are those that are caused by a proposed action, but that may occur later in time or farther removed in distance, relative to the primary impacts of the proposed action (40 C.F.R. Section 1508.7)

Applicants should identify the direct and indirect effects of the proposed action; which resources, ecosystems, and human communities are affected; and which effects on these resources are important from a cumulative effects perspective.

## LIST OF ATTACHMENTS

The following checklist is a list of required and optional attachments to the Environmental Narrative as described in the sections above. The items listed in the optional section may be required by EDA at a later date to complete the project review and selection process, so it is recommended that you provide them now if they are currently available to expedite decision-making. While the documents listed below are the most common required to make determinations of compliance with all environmental requirements, EDA reserves the right to request additional items that are not listed below when necessary.

Applicants are not required to contact other governmental agencies for environmental or historical resources consultation until directed by EDA, though any interagency coordination letters that may be currently available should be provided. **EDA expects that all Applicants whose projects are selected for a Non-Binding Commitment letter will proceed with consultations in an expeditious manner. As such, Applicants should have the required information prepared for submission immediately upon notification of selection by EDA.** If you determine that your project may affect environmental or historical resources, you may contact the appropriate Regional Environmental Officer to determine if early interagency consultation is appropriate.

Checklist of Required Environmental Documents that must be submitted with Application:

* + USGS topographic map(s) and site map(s) (see Section B1)
	+ FEMA floodplain map with map number (see D4)
	+ Appendix A: Applicant Certification Clause (See D9)

Checklist of Optional Environmental Documents that should be submitted with Application if available (will expedite review and selection process):

* + SHPO/THPO and Tribal leader comments and copy of submittals (see Section C)
	+ Site photographs (see Section D1)
	+ Coastal Zone consistency determination (see D2)
	+ Wetland delineation and/or Jurisdictional Determination (see D3)
	+ Preliminary wetland info (see D3)
	+ U.S. Army Corps of Engineers comments, Section 404 Permit, Section 10 Permit, and/or Water Quality Certification (401 approval) (see D3)
	+ Biological Assessment and/or survey for federally protected species (see D6)
	+ Correspondence with US Fish and Wildlife Service and/or National Marine Fisheries Service (see D6)
	+ Natural Resources Conservation Service determination of Prime Farmland, Form AD-1006, if applicable (see D7)
	+ Phase I and II Environmental Site Assessment (see D9)
	+ Sole Source Aquifer review by US Environmental Protection Agency, if applicable (see D10)
	+ Other federal, state and local environmental permits (see D17)
	+ Copies of public notices, public hearing minutes, etc. (see D18)

All References refer to applicable Environmental Compliance section of Form ED-900, *Application for EDA Assistance.* Applicants should carefully review the applicable FFO for unique requirements for each individual grant competition.