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