

**Environmental Information Document
and Environmental Report**

Project Name _____

Project Owner _____

Address _____

Project Location _____

Drinking Water System Name _____ WSID No. _____

State Assigned Drinking Water Revolving Loan (DWSRF) Number RF3- _____

Wastewater and/or Stormwater System Name _____

List Existing Permit Numbers: _____

State Assigned Clean Water Revolving Loan (CWSRF) Number RF1- _____

All Projects: USEPA Grant (STAG) Number _____

Federal Fiscal Years (s) of USEPA Grant Appropriation _____

Applicants are strongly encouraged to consult early and frequently with our staff to ensure that all environmental issues are described, evaluated, and impacts appropriately considered and mitigated, in order to expedite the application process and SRF review and approval of a proposed project

SRF design review staff will independently evaluate and verify accuracy of information supplied in the project environmental report, and issue the CATEX, FONSI or ROD determination.

If an SRF determination is made that an Environmental Assessment or an Environmental Impact Statement is required, for projects with a greater complexity of impacts and mitigation, the SRF staff will be responsible for initiating the preparation of this document internally or by a third party.

The EIS will result in a Record of Decision determination, instead of a CATEX or FONSI.

Through a memorandum of understanding between United States Department of Agriculture-Rural Development and the Vermont Agency of Natural Resources, this environmental report format is acceptable to both funding agencies.

Please note that Environmental Review Determination eligibility, public comment, and public notice requirements may differ among the funding agencies.

Provide the “need of project” statement:	
Provide the “purpose of project” statement:	
Provide a brief description of the project scope and design as detailed in the Preliminary Engineering Report:	
Highlight the project features that will likely have an environmental impact or impact to historical resources or involve environmental justice issues. The level of project detail should be in keeping with the scope and magnitude of the construction project.	

Program Loan	Information Request	YES	NO
Projects requiring no Mitigation measures will qualify to proceed with a Categorical Exclusion (CATEX) process. Projects requiring Mitigation may qualify for a Finding of No Significant Impact (FONSI).			
CWSRF and DWSRF	Is the Project likely to have no or very minimal effects?		
CWSRF and DWSRF	Does the project require mitigation measures?		
CWSRF and DWSRF	Does the authorized project representative make a written request for a Categorical Exclusion, for Projects likely to have no or very minimal effects (included)?		
Projects of greater complexity and impact will require an Environmental Impact Statement (EIS) and result in a Record of Decision (ROD)			
CWSRF and DWSRF	Does the project involve greater complexity and impact or controversy ¹ ?		
CWSRF and DWSRF	Attach additional information such as a qualified consultant assessment or determination letters, permits from regulatory authorities, and mapping		
Projects limited to the existing footprint of a building (e.g., a UV disinfection project)			
CWSRF and DWSRF	No Impact Certification Statement, submitted?		
CWSRF and DWSRF	The project is restricted to the footprint of the existing building:		
Project Scope			
DWSRF	Will the project expand capacity to serve more than 500 additional users or a 30% increase in the existing population, whichever is greater?		
CWSRF	Will the project increase hydraulic (flow) treatment capacity by more than 20%		
CWSRF	Percent increase in hydraulic capacity		
CWSRF	Will the project increase influent 5-day biochemical oxygen demand (BOD5) organic treatment capacity by more than 30% ?		
CWSRF	Percent increase in BOD5 capacity		
CWSRF	Existing hydraulic capacities		gal.
CWSRF	Existing organic capacities		mg/l
CWSRF	Proposed hydraulic capacities		gal.
CWSRF	Proposed organic capacities		mg/l
Sole Source Aquifer			
DWSRF and CWSRF	Will the project take place in an area designated by the Environmental Protection Agency as a " Sole Source Aquifer "?		
New Project Features			
DWSRF	Does the project call for a jurisdictionally new withdrawal of groundwater or of surface water (10 V.S.A. § 1042(b))?		
CWSRF	Does the project include a new discharge to surface water or groundwater?		
DWSRF	Will the project result in a 30% increase in groundwater or surface water withdrawal at an existing site?		
DWSRF	Percent increase in groundwater/surface water withdrawal		
Mitigation			
DWSRF and CWSRF	Do you believe your project qualifies for a Categorical Exclusion in accordance with the Environmental Review Procedures for projects funded through the Vermont/EPA Drinking Water Revolving Loan Program and/or the Vermont/EPA Clean Water Revolving Loan Program , based on the environmental information and documentation, presented in the attached form?		
DWSRF and CWSRF	With your applicant's signature below, do you request a Categorical Exclusion for your project?		
DWSRF and CWSRF	If "No" above (Not a CATEX project), you must fill out all affected environmental and historical considerations below. If you answer "Yes" you will also need to provide the mitigation measures or an alternative action plan		

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¹ Environmental controversy. Controversy includes not only scientific disagreement about the mitigation's effectiveness, but also public interest or debate. Controversy is an unresolved group opposition, disagreement or concern to the proposed project within the affected community

1. Environmental Justice Considerations

Considerations	Yes or No	Basis for Determination and Documentation
The WID uses this form to establish compliance with NEPA requirements. The WID determination of NEPA compliance does not extend to other permitting by other agencies. The intention of the WID review/determination is to establish that the project development takes into account all direct and indirect aggregated environmental impacts of the project.		
Sensitive Communities include persons who: may have reduced mobility; persons who reside in hospitals, nursing homes, convalescent homes, intermediate care facilities, board and care facilities, and retirement service centers; communities disenfranchised due to economic condition; communities disenfranchised by minority status, such as ethnic, religious, race, color or sexual identity. Sensitive communities includes children and elderly individuals within each of the definitions above.		
Will the project adversely affect a sensitive population? Present a map produced using the online EJSCREEN tool , showing the project perimeter.		
Will the project affect sensitive populations? Project characteristics that may result in effects on sensitive populations include: Measures to avoid loss of life or injury during flood or storm events; construction or operation dust, odor or noise control measures; storage of hazardous chemicals in areas of sensitive communities; limitations on transportation access etc.		
Is the project known or expected to have a significant negative effect on the quality of the human environment? Consider the cumulative and also the long term effects of the project on the community. Provide a narrative of anticipated effects.		
Will the project contribute to significant changes to the socioeconomic makeup of the area?		
Is the project unaffordable? Provide an evaluation of the projected effect on user rates versus the affordability analysis.		
Has the project undergone an alternatives analysis evaluating practicable alternatives to address the pollutant or pollutants of concern (Criterion 9 of Chapter 2)?		
Does the project implement the least cost alternative based upon a Life Cycle Cost Analysis (Criterion 9 of Chapter 2)?		
Does the project implement the least cost alternative of the Long-Term Cost Effectiveness Analysis per (Criterion 9 of Chapter 2)?		
Does the project impact an “existing use” contact recreational activity (on or after November 28, 1975) such as a swimming hole listed in a published Tactical Basin Plan?		

2. Cultural, Historic and Archaeological Resources

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Considerations	Yes or No	Basis for Determination and Documentation
Projects shall protect cultural, historical and archaeological resources as they are of value to the community. Qualified consultants will assist and coordinate with WID and SHPO staff in making determinations and concurring with project applicant.		
Historic Sites Act: Will the project adversely affect a federal [16 U.S.C. sec. 461-467, (1935)] historic site?		
Will the project adversely affect a state Vermont historic preservation act historic site? <i>(Please include copies of the historic resources assessment or archeological reports and subsequent phases as needed. List the qualified consultant, agencies and groups consulted.)</i>		
National Historic Preservation Act [16 U.S.C. §470 et. seq. (1966)] : Will the project adversely affect historic buildings, over 50 years old, or listed in the National Register of Historic Places? https://www.nps.gov/subjects/nationalregister/database-research.htm Provide a list of any listed buildings, buildings over 50 years old, in the project area, and photos of each building, or a report by a qualified ACCD listed consultant .		
Vermont listed historic preservation resource: Will the project adversely affect a Vermont listed historic resource? https://accd.vermont.gov/historic-preservation/identifying-resources Provide a list of any listed buildings, buildings over 50 years old, in the project area, and photos of each building, or a report by a qualified ACCD listed consultant .		
Archaeological and Historic Preservation Act: Will the project adversely affect cultural resources? [16 U.S.C. §469a-1 (1974)] current 54 U.S.C. chapter 3125		
Vermont archaeological and historic preservation: Does the project adversely affect a Vermont listed cultural archaeological or historic resource? https://accd.vermont.gov/historic-preservation/resources-rules https://accd.vermont.gov/historic-preservation/identifying-resources Provide documentation that the project perimeter has been evaluated for presence of these resources.		
Executive Order 11593: Will the project adversely affect cultural resources "Protection and Enhancement of the Cultural Environment" https://www.archives.gov/federal-register/codification/executive-order/11593.html		

3. Land Use

Considerations	Yes or No	Basis for Determination and Documentation
Project applicant should identify related General Land Use features such as: a) Existing zoning ordinances, land use plans, development plans, etc.; b) Total land area required and/or proposed for purchase and the area that will be disturbed by construction for and operation of the proposed project; c) Current land uses in the area affected by the proposal, such as residential, commercial, agricultural, rangeland, forest land, recreational, etc; d) Compatibility of the proposed project with existing, if any: local, regional or state land use plans or controls; e) Any necessary mitigation measures.		
Does the project directly or indirectly adversely affect existing current land use? Provide mapping and information from local, regional, and state planning documents. Provide documentation of consultation with local and regional planning officials.		
Will the project convert federally classified Agricultural Soils to non-agricultural uses? Present a map showing the project along with Natural Resources Conservation Service (NRCS) soil classifications. [NRCS soil mapping survey] Farmland Protection Policy Act; Present a completed AD-1006 Farmland Conversion Impact Rating form. [7 U.S.C. §4201 et. seq. (1981)] Submit a determination by the federal Natural Resources Conservation Service List agencies and groups consulted.		
Does the project involve new impacts to identified primary agricultural soils, that may require mitigation of such impacts, to comply with Vermont Statute Act 250 Criterion 9(B)? State primary agricultural soils are defined: [10 V.S.A. Section 6001(15)] Refer to the online NRCS soil mapping survey and submit a map showing the project tract along with NRCS soil classifications [focused on rated Prime, Statewide, or Local soils of agricultural value group 1-7]. Provide a pre-application review letter from the Vermont Agency of Agriculture, Food & Markets. If offsite mitigation is anticipated to be proposed, please review the online "Fee Memo" indicating the current year estimated cost of offsite farmland mitigation acres (subject to annual revision), to present an estimated fee. Please note that all mitigation is subject to approval by the District Commission, and a proposed use of off-site mitigation outside a designated area would be subject to the Commission's findings as to appropriate circumstances. See 10 V.S.A. Section 6093.		Estimate Mitigation Fee
Is Land Use and Development review and approval under Act 250 necessary? Attach a copy of the ANR Project Review Sheet, or Permit Navigator output, including the District Environmental Commission determination on Act 250 permit requirements. <i>List agencies and groups consulted.</i>		

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Does the project contribute to sprawl growth outside of Designated Growth Centers? Present a map showing the project in relation to the Designated Growth Center. Attach copies of the Town Plan. Discuss using the Growth Center and Growth Management Document. List agencies and groups consulted.		
Will the project cause other significant environmental impacts, including secondary impacts? List agencies and groups consulted.		
Does the project alter or affect Formally Classified Lands (properties that are administered by either Federal, State, or local agencies)? Present a project area map, identifying each of the administered lands, from resources below as applicable. Federally Administered: Federal Tribal Lands BIA (download geospatial data) Surface Management Agency DoI (downloadable polygon) U.S. Forest Service (USFS) U.S. National Park Service (NPS) Nationwide Rivers Inventory Nat. Bureau Land Management BLM National Parks Conservation Association US Wildlife Refuges (USFWS) State and local land management and planning agencies: parks, and other state-owned and <u>state administered lands</u> (State Game Refuges, State Conservation Camps, State Fishing Access Areas, State Wildlife Management Areas etc.)		

4. Intergovernmental Review of Federal Programs

Considerations	Yes or No	Basis for Determination and Documentation
Does the project coordinate local government concerns in the review of proposed Federal financial assistance and direct Federal development? Executive Order 12372, Intergovernmental Review of Federal Programs		

5. Wetlands, floodplains, coastal zones, wild and scenic rivers

Considerations	Yes or No	Basis for Determination and Documentation
A qualified wetland professional is responsible for mapping lands meeting the definition of a wetland and its buffer area, to ensure proper continued function. The project applicant must demonstrate viability of the project without deterioration of wetland function.		
Will there be construction in a wetland or wetland buffer? Executive Order 11990, "Protection of Wetlands;" as amended by Executive Order No. 12608 (1997) A wetland buffer perimeter compliant with Vermont Wetland Rules applies A qualified consultant's assessment and/or the regulatory authority's determination must be attached for any construction in wetlands.		

For any new construction please provide the wetlands classification delineation. List agencies and groups consulted. Indicate if a State permit or US Army Corps of Engineers permit is required. Qualified consultants are listed at: https://dec.vermont.gov/watershed/wetlands/what/id/wetland-consultant-list Present a printout of the map for the project location using: https://anrmaps.vermont.gov/websites/WetlandProjects/default.html The map should show the perimeter of the project, the wetlands in the project area and their corresponding buffer zone.		
<u>Floodplain and Floodway hazard considerations.</u> A detailed description of floodplain construction and a qualified consultant's assessment and/or the regulatory authority's determination must be attached. Show locations of all utility infrastructure on the Flood Insurance Rate Map (FIRM). Flood map available from Flood Insurance Rate Map. Refer to the SRF Guidance Document 37 on Floodplain management for additional information. Caution: ANR ATLAS (floodready) contains digital DFIRM mapping for 6 of the 14 Vermont counties: (Bennington, Chittenden, Rutland, Washington, Windham and Windsor County) and seven communities: (Bradford Village, Hardwick, Jay, Montgomery, Newbury, Stowe, and Wolcott). "About half of the flood hazard data in Vermont has been officially digitized". Note: TR-16 and other standard require that Critical Infrastructure is expected to be protected from a 500-year flood event. List agencies and groups consulted. All projects must comply with EO 11988 as amended by EO 13690 and reinstated by EO 14030.		
Will the project involve construction in a floodway? Publicly funded infrastructure should not be located within the floodway. Linear projects may have to cross a floodway but must be vertically located sufficiently above or below to avoid impacts. Include floodway boundaries on site plans and profiles.		
Will the project involve construction in a 100-year floodplain? Executive Order 11988, "Floodplain Management," as amended by Executive Order 12148 (1979) Publicly funded infrastructure should not be located within the 100-year floodplain. Linear projects may have to cross a 100-year floodplain, but must be vertically located sufficiently above or below to avoid impacts. All efforts to be made to locate critical infrastructure outside of floodplains to avoid impacts, however where unavoidable infrastructure shall be protected in accordance with the Executive Order and accepted standards. Include 100-year floodplain boundaries on site plans and profiles. Consult state guidance documents: https://floodtraining.vermont.gov/sites/floodtraining/files/documents/Accessory-Structures-Checklist.pdf		
Will the project involve construction in a 500 year floodplain? Publicly funded infrastructure should not be located within the 500-year floodplain (24 CFR §55.2(3)(i)&(4)). Linear projects may have to cross a 500-year floodplain, but may be vertically located sufficiently above or below to avoid impacts. All efforts to be made to locate critical infrastructure outside of floodplains to avoid impacts, however where unavoidable infrastructure shall be protected in accordance with accepted		

standards. Include 500-year floodplain boundaries on site plans and profiles.			WID
Will the project involve construction in a Vermont River Corridor? Provide a map created using the River Corridor layer of the ANR ATLAS, showing the perimeter of the project. Publicly funded infrastructure should not be located in the river corridor, as defined by the Vermont "Flood Hazard Area and River Corridor Protection Procedure" wherever practicable.			
Is a local zoning permit required for work in the flood hazard zone? Present copies of correspondence with local zoning official.			
Does the project require a hydraulic hydrologic study to comply with Act 250 Criterion 1(D) ? Attach the hydraulic study as an appendix to the application.			
Coastal Zone Management Act; [16 U.S.C. § 1451 et. seq. (1972)] Vermont does not participate in the Coastal Zone Management program.	NO		
Coastal Barriers Resources Act; [16 U.S.C. §3501 et. seq. (1982)] Vermont waters are not affected by tidal action, therefore the Coastal Barrier Resource Act of 1982 does not apply.	NO		
Will the project impact a wild, scenic or recreational river area and create conditions inconsistent with the character of the river? Discuss if the project is within a quarter-mile of a river on the National Park Service's Nationwide Rivers Inventory. A listing of rivers on the Nationwide Rivers Inventory is available at: Wild and Scenic Rivers Act ; [16 U.S.C. §1271 et. seq. (1968)] <i>List agencies and groups consulted.</i>			
Will the project involve construction in a stream? A qualified consultant's assessment and/or the regulatory authority's permit for stream alteration determination must be attached for construction in streams. List agencies and groups consulted.			
Will the project involve: directional drilling under a stream, or an aerial crossing over a stream? Explain how the project was designed to address flood resiliency. List agencies and groups consulted (VTDEC Rivers Program , VTRANS).			
Does the project involve earthen impoundment of more than 500,000 CF (4 MG) of wastewater (Vermont Dam Safety Rule §37-108)? Explain if the impoundment is a Dam under the jurisdiction of the VT-ANR and what additional engineering and design standards apply.			

Will the project involve dewatering from excavation activities or the discharge from potable water infrastructure?		
Does the project involve known petroleum contamination from spills or from excavation of above ground or underground storage tanks? <u>General Permit 3-9004 for direct discharges to surface waters from petroleum related remediation activities.</u> <u>General Permit 3-9016 for discharges into municipal wastewater treatment facilities from petroleum related remediation activities.</u>		
Will the project involve a temporary (less than 90 days) discharge of groundwater, surface water, or potable water structures and conveyances from potable water infrastructure? <u>General Permit 3-9012 for Discharges from Potable Water Infrastructure Activities</u>		

6. Fish and wildlife, and endangered species.

Considerations	Yes or No	Basis for Determination and Documentation
The preservation of Vermont's natural fauna is an objective of all CWSRF funded projects. The EID related efforts should ensure that affected species are not identified by name , to protect their habitat.		
Will the project affect coastal fishing? Magnuson-Stevens Act (Rule at Fed. Reg. 85 FR 44220) and Essential Fish Habitat Consultation Process [as amended 16 U.S.C. §1801 et. seq (1996)]	No	Vermont does not have Exclusive Economic Zones.
Will the project: impound, divert, or otherwise control or modify the waters of any stream or body of water of the State? Fish and Wildlife Coordination Act [16 U.S.C. 661-667e (1934); as amended 1936, 1946, 1947, 1948, 1949, 1958, 1965] Identify the affected waters of the state. Provide citation and/or ANR Atlas map. Detail how many gallons will be impounded, what controls will be implemented, and the engineering and design standards applied, as well as any additional permitting, monitoring and reporting.		
Is the project likely to adversely affect birds covered by the Migratory Bird Treaty Act (MBTA) [(16 U.S.C. 703-712 (1918))] All Vermont birds are listed and migratory and will affect consideration of proposed project designs. Involuntary "take" of birds should be identified in the project definition.		
Does the project affect an eagle habitat or nest? Bald and Golden Eagle Protection Act		
Is the project likely to adversely affect an federally endangered or threatened species? Endangered Species Act [16 U.S.C. §1531 et. seq. (1973)] <i>A qualified consultant's assessment and/or the regulatory authority's determination must be attached demonstrating compliance with US Fish & Wildlife guidance. List agencies and groups consulted. Submit IPaC summary.</i>		
Is the project likely to adversely affect a Vermont state listed rare, threatened or endangered species? https://legislature.vermont.gov/statutes/section/10/123/05406 <i>A qualified consultant's assessment and/or the regulatory authority's determination must be attached</i>		
Is the project likely to adversely affect an ubiquitous statewide bat population? (area of tree removal) VTrans Ind Bat and Northern Long Eared Tree Cutting Guidance by Region.pdf (vermont.gov)		

WID

7. Drinking water and Groundwater Protection

Considerations	Yes or No	Basis for Determination and Documentation
Project Objectives shall safeguard the sources of drinking water and be protective of the groundwaters of the state, which are held in public trust. The Safe Drinking Water Act - 42 U.S.C. 300f et. seq. as amended in 1976, 1986, and 1996, and the State of Vermont Groundwater Protection Rules provide a framework for these objectives.		
Are there Sole Source Aquifers in the project area? Present a map showing the project perimeter area using the EPA online map " EPA Sole Source Aquifers ": and indicate any "sole source aquifers". https://geopub.epa.gov/DWWidgetApp/		(As of August 2022, Vermont has no identified sole source aquifers).
Will there be negative direct impacts to groundwater quality or quantity ? Discuss positive and negatives impacts to nutrients, groundwater, existing drinking water supplies		
Subsurface Contamination and Constituents of Concern		
Has the desktop review of reasonably available information identified a need for a workplan submittal for approval by SMS to address recognized environmental conditions (RECs), contamination or suspected contamination? Links to guidance: 1) " Linear Construction Projects Guidance Document " for projects that take place within a public or private roadway, railroad, utility line, or rights-of-way (ROW). 2) " Guidance For Construction of Public Works Projects in Areas Where Contamination is Suspected or Known " 3) Resources: ANR ATLAS layers- Hazardous Sites Hazardous Waste Generators Brownfields Salvage Yard Aboveground Storage Tank Underground Storage Tank Additional ANR ATLAS layers: Dry Cleaners – verify PFAS results – where known Urban Soil Background Areas Land use restrictions status Others as needed		Summarize Findings:
4) Does the desktop review identify any potential Emerging Contaminants ?		

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8. Air Quality, Noise and Emissions

Considerations	Yes or No	Basis for Determination and Documentation
Construction, related to the installation and upgrade of infrastructure, and operation of water and wastewater facilities can potentially have emissions and may be required to meet federal and state air emission thresholds. Air Quality - Clean Air Act, as amended in 1990. [42 U.S.C. §7401 et. seq.]		
Will there be any changes to air quality (VTDEC Air Control Regulations) ?		
Is an Air Pollution Control Permit required? Note: Emergency generators/pumps are only subject to limited requirements provided they are used strictly for emergency purposes (includes limited emergency demand response programs) and do not participate in peak shaving programs.		
Will there be any changes in emissions?		
Is your digester unequipped and operated without a flare?		
Are there any other non-emergency combustion devices at your facility, including but not limited to: stationary internal combustion engines such as diesel generators/ pumps, boilers or space heaters greater than 3 million BTU, or combustion turbines and/or boilers?		
Will there be any changes in noise levels?		
Will there be any changes in atmospheric dust levels?		
Will there be any explosive dust generation?		
Will there be any odor generation?		

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9. NEPA Related Considerations

Considerations	Yes or No	Basis for Determination and Documentation
Project planning and development should consider both direct and indirect impacts of the project on archaeological, cultural, and environmental site features. These are further defined in the federal NEPA language .		
Is there a controversy ² with respect to environmental effects of the project based on reasonable and substantial issues?		
Is the project significantly greater (requiring a new Act 250 permit, or permit amendment) in scope than normal projects for the area?		
Does the project have significant unusual characteristics (defined at 23 CFR 771.117 (b))?		
Does the project establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects (cumulative impact based on current information)?		
Does the project have significant adverse direct or indirect effects on federal or state parkland, other public lands, or areas of recognized Scenic or recreational value?		
Cumulative Impacts : Will the project cause other significant environmental impacts, including secondary impacts? <i>List agencies and groups consulted.</i>		
Will the project provide new drinking water facilities to serve a population greater than 2,000 persons, using population metrics consistent with the Public Water System regulatory program?		Current DW Population New DW Population

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² Environmental controversy. Controversy includes not only scientific disagreement about the mitigation's effectiveness, but also public interest or debate. Controversy is an unresolved group opposition, disagreement or concern to the proposed project within the affected community.

10. Mitigation Measures and/or Alternative Plans of Action

Mitigation measures are applicable, to minimize adverse effects. Explain how mitigation measures will be achieved and monitored (Special Grant Condition or review of Plans and Specifications). Remember to consider structural and non-structural methods.	
Affected Environmental or Archeological Resources	Mitigation Measures or Alternative Plan of Action
A.)	
B.)	
C.)	
D.)	

Potential Mitigation Measure Decisions, must evaluate consider the following:

The adverse effect must have a **reasonable chance of occurring** in the foreseeable future; mitigation measures are only useful and appropriate when there is a compelling reason to address an identified impact. If an adverse effect has a low expectancy in the foreseeable future, mitigation is not likely necessary.

Mitigation measures must be **reasonable and enforceable**. There must be a reasonable expectation that the measure can be implemented and have the desired outcome.

The WID often relies on other federal state and local permitting entities to **monitor and enforce implementation**; environmental regulatory or natural resource agencies are technically in the best position to accomplish this. As much as possible, the WID will work with applicants to ensure mitigation follow-up. This may require a brief mitigation plan or need to be detailed in loan agreements.

Measures must balance the potential for impact on a resource and the resource's relative environmental value. Potential impacts on unique or scarce resources, for example, may require a strong mitigation measure (e.g. restrictive measure).

10. Mitigation Measures and/or Alternative Plans of Action continued

Mitigation measures are applicable, to minimize adverse effects. Explain how mitigation measures will be achieved and monitored (Special Grant Condition or review of Plans and Specifications). Remember to consider structural and non-structural methods.	
Affected Environmental or Archeological Resources	Mitigation Measures or Alternative Plan of Action
E.)	
F.)	
G.)	
H.)	

Potential Mitigation Measure Decisions, must evaluate consider the following:

The adverse effect must have a **reasonable chance of occurring** in the foreseeable future; mitigation measures are only useful and appropriate when there is a compelling reason to address an identified impact. If an adverse effect has a low expectancy in the foreseeable future, mitigation is not likely necessary.

Mitigation measures must be **reasonable and enforceable**. There must be a reasonable expectation that the measure can be implemented and have the desired outcome.

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Prepared By	Date	Title
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Reviewed By	Date	Authorized Representative
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***Basis for Determination and Documentation**

The basis for determination and documentation information must be traceable and establish the factual data to support the response to each question. Any environmental concerns that are raised by federal, state, or local agencies or the public must be addressed as completely as possible and resolved before the environmental report will be considered complete. All supporting documentation (e.g., correspondence and exhibits) should be attached and easily cross-referenced back into the main body of the environmental report. Types of information to be included in this column are outlined below.

1. **FIELD OBSERVATION:** A site visit that does not usually involve any testing or measurements. FIELD OBSERVATION is an important method for initial screening of the issues, but for some of the categories it may be inadequate for final evaluation. Support documentation should include date of the site visit and by whom.
2. **PERSONAL CONTACT:** Personal contacts are useful when the individual contacted is an accepted authority on the subject(s) and the interview is documented. Supporting documentation should include the name, organization, and title of the person contacted and the date of the conversation. *Copies of written site inspection reports and determinations by regulatory authorities on applicability of regulations and permit requirements should be attached.*
3. **PRINTED MATERIALS:** These are useful sources of detailed information, materials such as comprehensive land use plans, maps, statistical surveys, and studies. Information must be current, i.e., not so old that changing conditions make them irrelevant and must represent accepted methodologies. Citations for the material should include enough information so that an outside reviewer can locate the specific reference.
4. **SPECIAL STUDY:** This is a study conducted for an individual factor or resource, and should be performed by a qualified person using accepted methodologies. Some tests are relatively simple to perform but others may require elaborate equipment or personnel with additional expertise. The preparer is responsible for obtaining assistance from others in order to have the appropriate test or studies conducted. Copy of the study must be appended or referenced as for Printed Materials.
5. **CONTRIBUTOR EXPERIENCE:** The professional judgment of the persons contributing to this environmental report can be useful provided their expertise is relevant. The contributor may have previous knowledge from familiarity with the area, or may have professional background to make judgments about a specific factor. Provide information of the person's qualification in addition to name, organization and position.