The NRCS-CPA-52

A planning and decisionmaking tool
Environmental Evaluation (EE)

- Specific to NRCS
- Required for all conservation planning activities
- Considers impacts of alternatives on
  - Soil, Water, Air, Plant, Animal, and Energy resources
  - Human social and economic concerns
  - “Special Environmental Concerns”
- Used to determine the level of NEPA analysis needed when NRCS funds or authorizes a planned activity
  - Categorical Exclusion
  - Environmental Assessment
  - Environmental Impact Statement
NEPA Sec. 102

...all agencies of the federal government shall

A. utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man’s environment;

B. identify and develop methods and procedures...which will insure that...environmental amenities and values may be given appropriate consideration in decisionmaking along with economic and technical considerations....
NRCS NEPA Implementing Regulations
[7 CFR, Part 650]

• Environmental evaluation (EE) is the part of planning that inventories and estimates the potential effects on the human environment of alternative solutions to resource problems.

• The EE integrates environmental concerns throughout the planning, installation, and operation of NRCS-assisted projects. The EE applies to all assistance provided by NRCS...
Insure that plans satisfy identified needs and at the same time minimize adverse effects of planned actions on the human environment through interdisciplinary planning before providing technical and financial assistance.

7 CFR Part 650.3 (b)(4)
An environmental evaluation is a concurrent part of the planning process in which the potential long-term and short-term impacts of an action on people, their physical or social surroundings, and nature are evaluated and alternative actions explored. The EE is required for all NRCS planning activities and is documented on Form NRCS-CPA-52, “Environmental Evaluation Worksheet.”
Required for planning and for programs!

**PLANNING:**

GM 180, Part 409(H): The EE, which may lead to an environmental assessment (EA) or environmental impact statement (EIS), **will be conducted for all NRCS planning activities** and will be used to help determine the level of NEPA documentation required.

**PROGRAMS:**

440 CPM 514.44 A. “...development of the preliminary WRPO begins during the onsite ranking visits with the landowner and NRCS...The purpose of the preliminary WRPO is to provide sufficient information to allow the landowner to understand the project’s anticipated scope and effect, including habitat objectives and anticipated restoration, management, and O&M requirements.... This basic information is necessary...to determine whether to proceed in the enrollment process.”

440-CPM 514.44 B. - “The preliminary WRPO—...Includes an NRCS Environmental Evaluation using Form NRCS-CPA-52, which should be completed as part of the planning process....”

*Just two of many references in NRCS regulations and policy*
Conservation Planning Process

NRCS Planning Process

- 3 phases
- 9 steps
- Iterative
- Dynamic, Flexible
<table>
<thead>
<tr>
<th>Step 1 Identify Problems</th>
<th>Step 2 Determine Objectives</th>
<th>Step 3 Inventory Resources</th>
<th>Step 4 Analyze Resource Data</th>
<th>Step 5 Formulate Alternatives</th>
<th>Step 6 Evaluate Alternatives</th>
</tr>
</thead>
</table>

**Step 1 Identify Problems**

**Step 2 Determine Objectives**

**Step 3 Inventory Resources**

**Step 4 Analyze Resource Data**

**Step 5 Formulate Alternatives**

**Step 6 Evaluate Alternatives**
### Step 3: Inventory Resources

<table>
<thead>
<tr>
<th>Environmental Concerns</th>
<th>Environmental Laws, Executive Orders, policies, etc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetlands</td>
<td>Document all impacts (Attach Guide Sheets as applicable)</td>
</tr>
<tr>
<td>Wild and Source Areas</td>
<td>Document all impacts (Attach Guide Sheets as applicable)</td>
</tr>
<tr>
<td>Other Agencies and Federal Policies</td>
<td>Document all impacts (Attach Guide Sheets as applicable)</td>
</tr>
</tbody>
</table>

### Step 4: Analyze Resource Data

- **Clean Air Act**
- **Clean Water Act**
- **Ozone Zone Management**
- **Coral Reefs**
- **Endangered Species**
- **Human Habitation**
- **Migratory Birds**
- **Natural Areas**
- **Prime and Unique Farmland**
- **Riparian Areas**
- **Socio-Economic Data**

### Step 5: Preferred Alternatives

- **Evaluation Criteria**
  - **Cost/Benefit Analysis**
  - **Public Involvement**
  - **Environmental Impact Assessment**

### Step 6: Evaluate Alternatives

- **Table 1**
- **Table 2**

### Step 7: Make Decisions

- **Final Decision Matrix**
- **Implementation Plan**
- **Monitoring and Evaluation Plan**
The following sections are to be completed by the Responsible Federal Official (RFO).

### NEPA Compliance Finding (Check one)

<table>
<thead>
<tr>
<th>The preferred alternative</th>
<th>Action required</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) is not a federal action where the agency has control or responsibility</td>
<td>Document in “TL1” below. No additional analysis is required</td>
</tr>
<tr>
<td>2) is a federal action ALL of which is categorically excluded from further environmental analysis AND there are no extraordinary circumstances as identified in Section “F”.</td>
<td>Document in “R2” below. No additional analysis is required</td>
</tr>
<tr>
<td>3) is a federal action that has been sufficiently analyzed in an existing Agency state, regional, or national NEPA document and there are no predicted significant adverse environmental effects or extraordinary circumstances.</td>
<td>Document in “R1” below. No additional analysis is required</td>
</tr>
<tr>
<td>4) is a federal action that has been sufficiently analyzed in another Federal agency/NEPA document (EA or EIS) that addresses the proposed RFO action and its effects and has been formally adopted by NRC. NRC is required to prepare and publish its own Finding of No Significant Impact for an EA or Record of Decision for an EIS when adopting another agency’s EA or EIS document. (Note: This box is not applicable to FSA)</td>
<td>Contact the State Environmental Liaison for list of NEPA documents formally adopted and available for filing. Document in “R1.1” below. No additional analysis is required</td>
</tr>
<tr>
<td>5) is a federal action that has NOT been sufficiently analyzed or may involve predicted significant adverse environmental effects or extraordinary circumstances and may require an EA or EIS</td>
<td>Contact the State Environmental Liaison. Further NEPA analysis required</td>
</tr>
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</table>

### Justification Supporting NEPA Finding

<table>
<thead>
<tr>
<th>TL1</th>
<th>Findings Documentation</th>
</tr>
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<tbody>
<tr>
<td>TL2</td>
<td>Applicable Categorical Exclusion(s) (note only one may apply)</td>
</tr>
</tbody>
</table>

### Additional Notes

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**Step 7: Make Decisions**
<table>
<thead>
<tr>
<th>Planning Step</th>
<th>NRCS-CPA-52 Section</th>
<th>NEPA Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Identify Problems and Opportunities</td>
<td>E. Need for Action</td>
<td>Need for Action</td>
</tr>
<tr>
<td>2. Determine Objectives</td>
<td>D. Client Objectives</td>
<td>Purpose</td>
</tr>
<tr>
<td>3. Inventory Resources</td>
<td>F. Resource Concerns</td>
<td>Affected Environment</td>
</tr>
<tr>
<td>4. Analyze Resource Data</td>
<td>E. Special Environmental Concerns</td>
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</tr>
<tr>
<td>5. Formulate Alternatives</td>
<td>H. Alternatives</td>
<td>Alternatives</td>
</tr>
<tr>
<td>6. Evaluate Alternatives</td>
<td>I. Effects of Alternatives</td>
<td>Environmental Consequences</td>
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<td></td>
<td>J. Impacts to Special Environmental Concerns</td>
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<tr>
<td>7. Make Decisions</td>
<td>M. Preferred Alternative</td>
<td>Categorically Excluded</td>
</tr>
<tr>
<td></td>
<td>Q.-S. NEPA Compliance Finding</td>
<td>Finding of No Significant Impact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Record of Decision</td>
</tr>
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</table>
WRP/WRE Examples

WRPO

• Client Objectives
  • Program purposes must be met
    • Restore, protect, enhance wetlands
    • Maximize wildlife habitat benefits

• Benchmark Conditions
  • Soil, water, air, plant, animal?
  • Public health and safety, land use, labor, management level?
  • Cultural resources, endangered/threatened species, invasive species?

Compatible Use Authorization

• Client Objectives
  • Further long-term protection and enhancement of the wetland and other natural values or the area

• Effects of Alternatives
  • Document how the CUA
    • Furthers long-term protection and enhancement
    • Effect on habitat
      • Migratory Birds
      • T&E, at-risk species
Section K. – Other Agencies and Broad Public Concerns

• Permits Required
  • Clean Water Act Section 404
    • Nationwide Permit (NWP) 27 - Aquatic Habitat Restoration, Establishment, and Enhancement Activities
    • To be authorized by this NWP, the activity must result in aquatic habitat that resembles an ecological reference.
More NRCS-CPA-52 Training

• AgLearn Course NRCS-NHQ-000048
  • The NRCS-CPA-52 Environmental Evaluation Worksheet
  • Web-based, self-paced
  • 4 – 5 hours

• NRCS Environmental Compliance Web Page
    • Environmental Evaluation Series Webinars (11)
      • Focused on Special Environmental Concerns
    • Johnny Chism’s YouTube Channel
      • Demonstrate how to use the Environmental Evaluation Planning Tool
Questions?

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Portland, OR