

The NEPA Process: Evaluation Criteria

What are evaluation criteria?

The NEPA process requires the evaluation of multiple alternatives that could meet the project's Purpose and Need while identifying and considering potential social, economic, and environmental (SEE) impacts. The joint lead agencies (FHWA and MnDOT), through involvement with cooperating and participating agencies and the public, are responsible for determining the range of alternatives to be considered. In addition to various "build" alternatives, project sponsors must also evaluate a "no-build" or "no action" alternative. The "no-build" scenario evaluates outcomes if the proposed action were not taken, with allowances for routine maintenance or safety improvements.

The joint lead agencies are responsible for determining the methodology and level of detail for the evaluation of alternatives. Evaluation criteria are the measures used to compare the set of alternatives identified for consideration. The criteria are applied to the potential "build" alternatives as well as the "no-build" scenario, that functions as a baseline for comparison.

Why are evaluation criteria important?

All reasonable alternatives must be evaluated at a similar level of detail for the various documents in the environmental review process. In Minnesota, when MEPA (Minnesota Environmental Policy Act) is incorporated into the NEPA process for projects requiring an Environmental Impact Statement (EIS), the first evaluation of alternatives comes during the Scoping Decision Document. This document takes a high-level review of the alternatives with a consistent set of evaluation criteria. Because much information is still unknown at this point, the evaluation criteria are used to screen out alternatives that have fatal flaws such as unacceptable/unmitigable impacts to SEE resources and to identify a range of alternatives that will be evaluated in greater detail in the draft environmental impact statement. Cooperating and participating agencies, along with the general public, review and provide input on the evaluation criteria and the screening of alternatives. At the end of the Scoping process, a range of alternatives are moved forward.

Alternatives that make it into the Tier 1 Draft EIS stage are further reviewed. Once again, a consistent set of evaluation criteria are used to determine the merits of each alternative. The criteria utilized at this stage are more refined and can get at greater detail because additional studies have been completed within the logical termini in regards to better understanding SEE resources. The Tier 1 Final EIS must select a preferred alternative (for the Rethinking I-94 project this will include determining the mainline alternative as well as the access locations and a range of alternatives at those locations). The evaluation criteria form the basis from which this decision is made.

In addition to the criteria and measures used to eliminate alternatives and who was involved in selecting them, the EIS must also note the point in the process at which they were eliminated.

The purpose of evaluating alternatives is to assess which of them meet the purpose and need and provide benefits that can be justified despite significant cost and identified environmental impacts. In cases where no alternative completely meets the purpose and need, clear evaluation criteria can help establish critical, desirable, and supporting elements of the purpose and need to determine whether an action should be pursued despite financial and environmental costs.

How are evaluation criteria used?

When evaluating alternatives, whether it be in the Scoping or Tiered EIS stage, the evaluation criteria are first used to determine whether a range of alternatives address the project's Purpose and Need. Alternatives that are determined to address the Purpose and Need would be considered for further evaluation. Those that do not address the Purpose and Need would be rejected as not being reasonable.

Once alternatives that address the Purpose and Need are identified, they are further evaluated to determine their impacts on social, economic, and environmental (SEE) resources within the project area. Alternatives that have unmitigable impacts are rejected. Those that have the potential for significant impacts may be rejected or revised to reduce potential impacts.

Alternatives that address the Purpose and Need and have fewer impacts to SEE resources are likely to move forward. During the Tier 1 EIS, the evaluation criteria will be further detailed and refined. The range of reasonable alternatives will be further evaluated in the Tier 1 EIS in regards to Purpose and Need, impacts to SEE resources and to determine if there is an alternative that better addresses additional project goals. At this stage, the alternative that addresses the Purpose and Need, generally has fewer impacts to SEE resources, and address project goals is likely to be identified as the preferred alternative.

What are some examples of evaluation criteria?

Evaluation criteria are project-specific, but could include:

- VMT reduction
- Improved throughput
- Reduced crashes, injuries, and fatalities
- Social, economic, and environmental impacts:
 - Land use
 - Farmland
 - Social/relocation
 - Air quality
 - Noise
 - Water quality
 - Wetlands
 - Floodplains
 - Parks and schools (4f)
 - Threatened or endangered species
 - Historic and archaeological preservation
 - Hazardous waste
 - Visual
 - Energy use

Sources

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