1.0   Background Information

1.1   Introduction

1.1.1   Need for Engineering Reports/Environmental Information Documents

As part of the funding process, the Division of Water Infrastructure (the Division) is required to review an engineering report (ER)/environmental information document (EID). The ER/EID review process occurs after a project is approved for funding but during the

> Proposed Project – The project that is proposed by the Owner to be constructed utilizing funding available from the Infrastructure Finance Section.

beginning stages of the funding process regardless of the type of funding. The Division administers the Clean Water State Revolving Fund (CWSRF) and Drinking Water State Revolving Fund (DWSRF) programs on behalf of the U.S. Environmental Protection Agency (EPA), and the Community Development Block Grant for Infrastructure (CDBG-I) on behalf of the U.S. Department of Housing and Urban Development (HUD). Last, the Division also administers State Revolving Loan (SRL), State Emergency Loan (SEL), and State High Unit Cost (HUC) and Technical Assistance Grants (TAGs).

For the CWSRF and DWSRF programs, a review of the ER/EID is part of the operating agreement with EPA. Through review of the ER/EID, the Division determines whether the proposed project is one that is technically sound, consistent with the goals of the Department of Environment and Natural Resources (DENR), and minimizes the impact to the environment. Figure 1.1 on the next page shows the overall funding process for the CWSRF program. Other programs follow a similar pattern.

For the CDBG-I program, a review of the ER is part of the grant administration process to ensure that the project is technically sound on a conceptual basis. Please note that the environmental review for the CDBG-I program occurs under a completely separate process. Therefore, certain parts of this section will not apply. When this occurs, footnotes will indicate as such.

The EID is used to fulfill the requirements of the North Carolina Environmental Policy Act (also called the State Environmental Policy Act) (SEPA) or the National Environmental Policy Act (NEPA) where funding is a Federal program. A SEPA or NEPA analysis determines whether the project will significantly impact the environment in a negative way. Section 1.4.2 contains more information related to the EID.[1]

To maintain cohesiveness across all funding programs, the ER/EID process does not vary by funding program. What varies is the project scope and the application of the minimum criteria used to determine the type of final environmental document required (e.g., CE or DMCA). The type of environmental document required determines whether a minor or major ER/EID is prepared.

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[1] Applies only to the CWSRF, DWSRF, HUC, and TAG programs and not to the CDBG-I program.

1.1.2   Ways in Which Guidance Has Been Revised

The Division has revised the guidance in several ways which include the following:

- Tailoring the ER guidance to different project types.
- Tailoring the EID guidance to better fit Division needs.
- Refining descriptions of the expectations for the ER/EID documents being prepared.

The ER guidance has been revised to better fit the different project types that the Division can fund. For example, the information required in an ER for a wastewater treatment plant expansion will differ from what is required for stream restoration.

Also, the EID guidance has been revised to allow for a more efficient review by environmental agencies and the Division. For example, the U.S. Army Corps of Engineers (USACE) has wanted the Division to include stream information in the wetlands section so that they only have to review one section of the EID. The Department of Administration (DOA) guidance, which has been used in the past, has this information in the Water Resources section. The revisions to the EID guidance will place stream information with wetlands information.

Another area that has been improved is a better description of expectations for the content of an ER. For example, this guidance is more descriptive in how to calculate user fee increases and revenue generation by the user fee increases. It is also specific as to what maps, tables, and figures are needed for each project type. The revisions to the guidance are crucial, as the accuracy and clarity of the ER could impact whether a project is approved in the appropriate timeframe and whether it is funded.

In the Summer of 2012, staff of the Facilities Evaluation Unit (FEU) reviewed guidance and made some revisions. Some major highlights include:

- Providing more detail associated with expectations for information provided in the ER/EID.
- Refining methodologies and expectations associated with population projections and flow.
- Refining workbooks for use with certain sections of the ER/EID.
- Adding an additional section to provide guidance on how to prepare an ER/EID for rainwater harvesting projects.
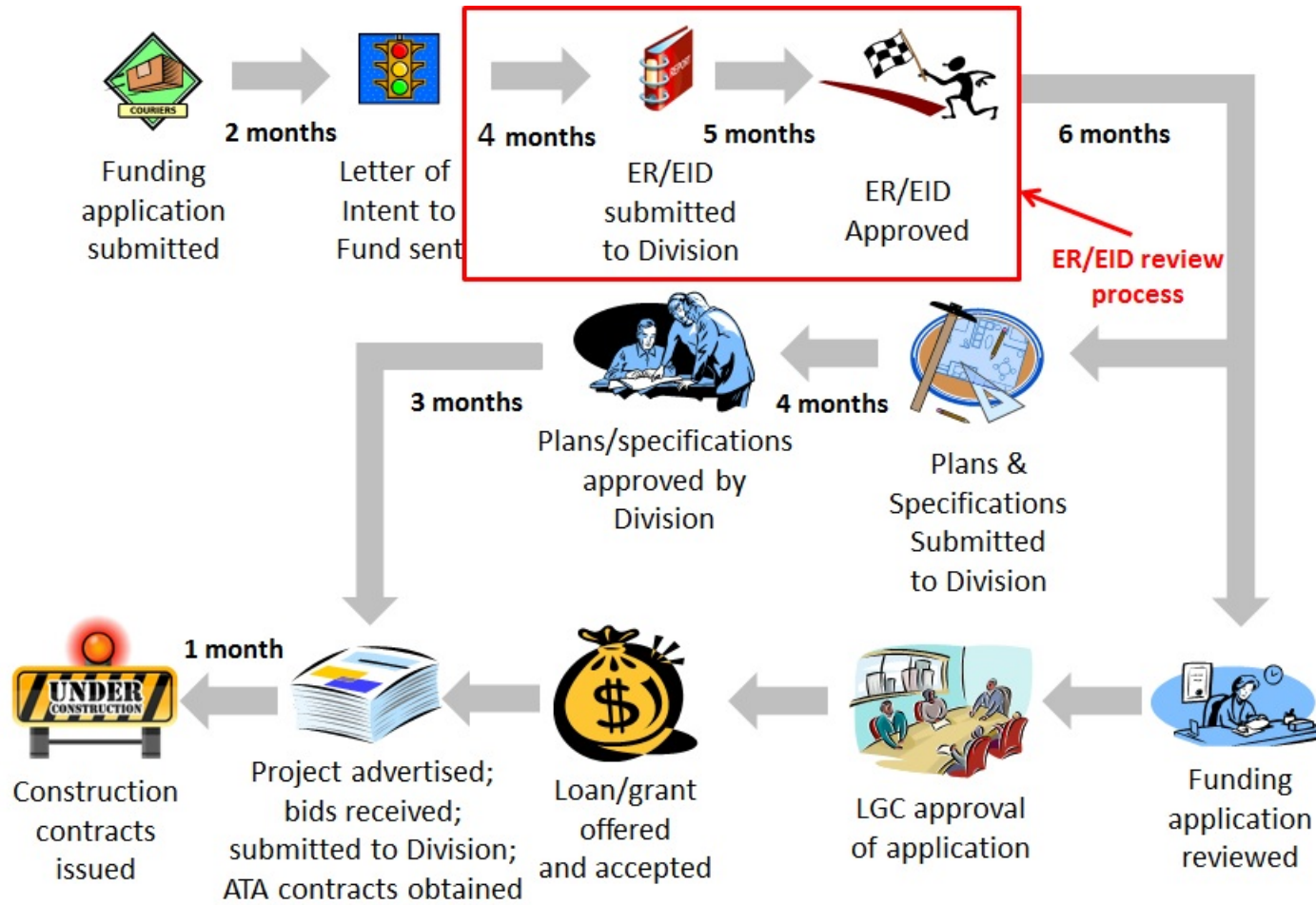
Figure 1.1. Overview of Division of Water Infrastructure General Funding Process

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1.2 Funding Information

The Division administers several funding programs as described below. An ER/EID is required for all funding programs; however, the approval process varies slightly depending on which funding program is associated with

> Changes in interest rates are located on the IFS website. Interest rates change every year on March 31st.

the project.[2] The next sections provide information about each funding program as it relates to the ER/EID approval process. For more information on these programs see the Financial Assistance Programs page of the IFS website. Unless noted below, the rates for all funding program loans is four percent or one-half the prevailing market rate, whichever is less, and the term is a maximum of 20 years, as determined by the Local Government Commission (LGC).

1.2.1 Clean Water State Revolving Fund

The CWSRF program is a state-administered Federal program that provides low-interest loans to eligible owners of wastewater infrastructure. The loan amount may cover the eligible cost of the entire project (see the latest CWSRF Intended Use Plan (IUP) for project funding maximum amounts). All projects that receive

> Eligible Owner – Local government units (LGU) and nonprofit water corporations. This is defined by state statute for all IFS funding. Note: This differs from Federal CWSRF program allowances.

CWSRF funds must complete an ER/EID that can support a Determination of Minor Construction Activity (DMCA), Finding of No Significant Impact (FONSI), or Record of Decision (ROD), per Federal requirements, and can result in an approvable ER/EID.

CWSRF funds can cover all types of projects ranging from Section 212 project types such as WWTPs, collection systems (gravity sewers and pump stations and force mains) and wastewater infrastructure equipment replacement/rehabilitation. Additionally, the scope of funding for CWSRF includes additional green project types such as stormwater and stream restoration. The EPA has additional information related to the CWSRF. See the Division's website for more information related to the CWSRF program. Applications are accepted twice a year with deadlines of September 1st and March 31st, and if the cost of all projects is higher than the amount of money available, then a priority points system is used to determine who receives funding for that particular cycle.

1.2.2 Drinking Water State Revolving Fund

Like the CWSRF program, the DWSR program is a state-administered Federal program that provides low-interest loans to eligible owners of drinking water infrastructure. The loan amount may cover the eligible cost of the entire project (see the latest DWSRF IUP for project funding maximum amounts). All projects that receive DWSRF funds must complete an ER/EID that can support a Categorical Exclusion (CE), a FONSI, or ROD, per Federal requirements, and can results in an approvable ER/EID.

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[2] The environmental review, including EID, is a separate process for the CDBG-I program.

DWSRF funds can cover drinking water projects that are eligible under the Safe Drinking Water Act of 1996 (SDWA) such as water treatment plant (WTP) rehabilitation, water line rehabilitation, and water storage. See the Division's website for more information related to the DWSRF program. Applications are accepted once a year with a deadline of September 1st.[3] If the cost of all projects is higher than the amount of money available, then a priority points system is used to determine who receives funding for that particular cycle.

1.2.3   Community Block Development Grants for Infrastructure

Community Block Development Grants for Infrastructure are administered by the Division on behalf of the HUD. Funds from the CDBG-I program can be used to assist low-to-moderate income (LMI) communities to improve their living conditions. Only areas of a community or entire communities with LMI values of 51 percent or greater are eligible for this funding.

CDBG-I funds can cover both drinking water and wastewater projects. The types of projects that can be funded are similar to that found in the CWSRF and DWSRF programs with the exception that no green projects may be funded. See the Division's website for more information related to the CDBG-I program. Applications are accepted twice a year with deadlines of March 1st and September 1st.[4]

1.2.4   State Revolving Loan Program

The State Revolving Loan (SRL) program was created by the North Carolina Legislature in 1987. Currently, local government units (LGUs) that meet the high unit cost threshold can receive an interest rate of zero percent. By legislation, this program has a loan limit of $3,000,000. Applications are accepted twice a year (due on September 30th and March 30th), and if the cost of all projects is higher than the amount of money available, then a priority points system is used to determine who receives funding for that particular cycle. The ER/EID must be approved prior to the deadline for the next review cycle. Additional information plus application materials for the SRL program are available on the Division's website.

1.2.5   State Emergency Loan Program

The State Emergency Loan (SEL) program is very similar to the SRL program. However, it does have specific requirements in that there must be a certified water quality or health-related emergency associated with existing facilities. The Division requires a letter from a Division of Water Resources (DWR) regional office with jurisdiction over the LGU to certify that the situation constitutes eligibility for the SEL program. This letter and other related documentation should be included in the ER/EID.

The interest rate for this program can be zero percent if the applicant qualifies. Applicants can apply at any time. Information related to this program is available on the Division's website.

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[3] Pending legislative approval at the Summer 2014 short session.
[4] A one-time intake of CDBG-I applications will occur on May 1, 2014.

1.2.6 State Grant Programs

In the Summer 2013 legislative session that created the Division of Water Infrastructure, the North Carolina General Assembly began funding state-funded grant programs. Two grant programs now exist: the HUC and TAG programs.

The HUC program is available to LGUs who meet the HUC threshold and are located in a Tier 1 or Tier 2 county. These funds are available for both wastewater and drinking water projects that are similar to the project types listed in Sections 1.2.1 and 1.2.2 for the CWSRF and DWSRF programs. Note that the Division has made the decision at this time to not fund any green projects with state grant money. Grant limits are $3,000,000 every three years per LGU. Applications for the grant program are anticipated to occur once a year with a September 1st deadline.

The TAG program is available to LGUs located in Tier 1 or Tier 2 LGUs where a wastewater or drinking water facility is (1) violating its permit limits, (2) has the potential to violate its permit limits, or (3) experiencing operational problems. The TAG funding is intended to enable an LGU to study the problem and develop a proposed solution based upon the results of the study. Grant limits are $50,000 every three years per LGU. Applications for the grant program are anticipated to occur once a year with a September 1st deadline.

1.3 ER/EID Review Process

1.3.1 General Review Process

As discussed in Section 1.1.1, the review of the ER/EID occurs after a project is approved for funding but during the beginning stages of the funding process. The type of funding program that the project is proceeding under will determine what type of environmental document is prepared by the Division and may also influence the extent of detail related to the ER/EID (see Section 1.4). For CWSRF projects, the ER/EID must be submitted and approved in accordance with the timeline set forth in the 2012 IUP[5]. (Figure 1.2 shows the timeline for submission and review of the ER/EID under the 2012 IUP.)
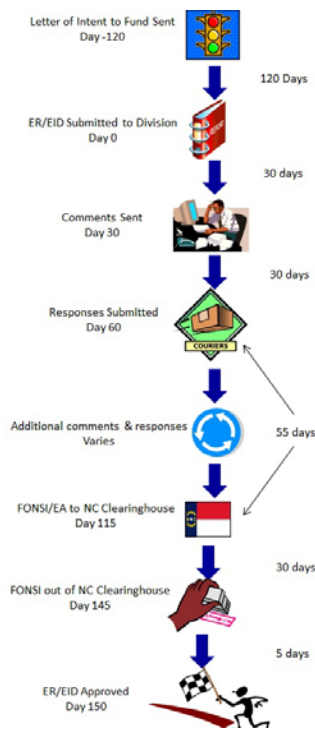

Figure 1.2. ER/EID Review Timeline

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[5] The 2012 IUP is similar to the 2011 IUP but does have changes related to loan amounts, debt load, etc. Users of this guidance are strongly encouraged to review the 2012 IUP.

When reviewing the ER/EID, the Division must ensure that the proposed project is technically sound (viable with an appropriate alternative selected), is consistent with DWR's water quality program goals, and avoids, minimizes, and mitigates environmental impacts to the greatest extent practicable.

When preparing an ER/EID, **follow the guidelines in this document**. Additionally, the format discussed in Section 2.1 must be used, or the Division will not review the ER/EID. Adhering to the guidelines will enable the project to move through the Division's review process quicker by allowing for the reduction of review times. The submittal checklist for original ERs/EIDs is available on the IFS website and **must be submitted** along with the appropriate number of ERs/EIDs. The submittal checklist is available both in Appendix A and the Toolbox. Additionally, provide one copy of the SEPA Minor Construction Activities Checklist, which is available in Appendix B and the Toolbox (CWSRF/SRL projects). Only hard copies of the ER/EID, submittal checklist, and Minor Construction Activities checklist will be accepted. However, appendices with large amounts of data will be accepted in electronic format on CD or DVD on a case-by-case basis.

When review comments are sent by Division staff, it is critical to provide timely and complete responses. Respond to comments in a comment-response document where the responses are placed below each comment. If text, tables, or maps are changed is changed in the ER/EID, note where the changes were made and be sure to incorporate the changes in the revised ER/EID. Provide the submittal checklist for revised ERs/EIDs, which is available both in Appendix A and in the Toolbox. As shown in Figure 1.2, LGUs and/or their consulting engineers have 30 days allotted for response to comments in the CWSRF program.

> **Note: Responding in a timely manner ensures that the project remains in the current application round. Projects not approved by the ER/EID approval deadline will lose their funding commitment and require reapplication during a future round of funding.**

Prepare the ER/EID in accordance with the guidelines to the specific project type. Below outlines the project types covered in these guidelines for wastewater projects.

- Section 3.0 – Wastewater Treatment Plant Construction/Expansion/Modification
- Section 4.0 – Collection System Expansion
- Section 5.0 – Wastewater Equipment Replacement and Rehabilitation
- Section 6.0 – Collection System Rehabilitation
- Section 7.0 –Reclaimed Water Systems
- Section 8.0 – Stormwater Best Management Practices
- Section 9.0 – Stream, Wetland, and Buffer Restoration
- Section 10.0 – Energy Efficiency Projects for Wastewater Equipment
- Section 11.0 – Rainwater Harvesting (coming soon)

For drinking water projects, the following sections are available:

- Section 3.0 – Water Treatment Plant Construction and rehabilitation
- Section 4.0 – Water Main Projects[6]

If the project includes multiple project types from the list above, ensure that the ER/EID covers them in a clear manner. See Section 2.1.2 for more details. Also, the ER/EID must contain the level of detail that is required for the type of project. For example, a WWTP expansion that requires a FONSI will require the preparation of a Major ER/EID.

1.3.2   Program-Specific ER/EID Information

Submittal requirements vary depending on the funding program utilized. This section highlights these submittal variations.

1.3.2.1   Clean Water State Revolving Fund and Drinking Water State Revolving Fund ER/EID Submittal

ER/EID review for CWSRF and DWSRF projects follows a set schedule that lasts for a total of eight months, including ER/EID preparation. Hard deadlines exist for project review and are shown in Table 1.1.

Applications for CWSRF are accepted twice a year, and applications for DWSRF are accepted once a year. Once the State Water Infrastructure Authority (SWIA) meets to award funding, Letters of Intent to Fund are sent to those LGUs receiving CWSRF and DWSRF funding for that round by the first of the following month. For example, the SWIA is meeting in May 2014 to award funding to the CWSRF program. Letters of Notification will be mailed to all LGUs receiving funding by June 1, 2014. Once the letters go out, the LGU then has 120 days (4 months) to submit their ER/EID.

Table 1.1 CWSRF and DWSRF ER/EID Review Process Hard Deadlines		
Event	**March Cycle**	**September Cycle[†]**
CWSRF Application Submitted	March 1st	September 1st
Letter of Intent to Fund Sent	April 1st	October 1st
ER/EID Submitted	July 1st	January 2nd
ER/EID Approved	December 1st	June 1st

[†]September only for DWSRF projects.

ERs/EIDs must be submitted by the deadline shown in Table 1.1 and listed in the Letter of Intent to Fund. ***ERs/EIDs submitted after that date will not be accepted, and the LGU will have to reapply in the next funding round.*** Once the ER/EID is received, the review cycle begins. See Table 1.2 for the

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[6] Sections will be added to the drinking water ER guidance as the need arises.

Table 1.2. Typical ER/EID Review Process by Cycle for CWSRF and DWSRF[a]			
Event	Day	March Round	September Round
Letter of Intent to Fund Sent	-120	4/1	11/1
ER/EID Submitted to IFS	0	8/1	2/2
Comments Sent	30	9/1	3/1
Responses Submitted[b]	60	10/1	4/1
Additional Comments[b]		Varies	Varies
Additional Responses		Varies	Varies
FONSI to Clearinghouse[c]	115	11/25	5/25
FONSI out of Clearinghouse[c]	145	12/25	6/25
ER/EID Approved	150	1/1	7/1

[a]Recommended dates for SRL/SEL/HUC projects as well.

[b]Iterative process between LGU/consultant and Division staff.

dates associated with the review process.

During the ER/EID preparation process, the LGU and/or consultant will first complete a DMCA checklist that will show whether the project is above or below the minor construction activity threshold. For projects that are above the minor construction activities threshold, the ER/EID will be a Major ER/EID. For projects below the minor construction activities threshold, the ER/EID will be a Minor ER/EID. See Section 1.4.1 for more information. The LGU and/or consultant will prepare an ER/EID that follows the outline discussed in Section 2.1.1. Once the LGU and consultant are ready to submit the ER/EID, then the following will be part of the package:

- One Submittal Checklist
- One Minor Construction Activities Checklist
- Six copies (Minor ER/EID) or 19 copies (Major ER/EID)

The submittal checklist is utilized in two ways. First, it provides basic information about the project (e.g., contact information, project type, financial information) that the Division uses to both communicate and track projects. Second, it is a last check for the LGU and/or consultant to ensure that all sections required are present. Note that if the submittal checklist is not included in the submittal package, the package will be held until the submittal checklist is supplied. If it is not supplied within three days, then the submittal package will be returned.

Minor ER/EID – An ER/EID consisting of tables that *must be completed* using the methodologies described in this guidance. Used for projects that are below the minor criteria for SEPA (CWSRF-, SRL/SEL-funded projects) or NEPA (STAG-funded projects).

Major ER/EID – An ER/EID containing more detail in the body of the report than what is found in the minor ER/ED. Additional methodologies with justification are allowed. Used for projects that are above the minor criteria for SEPA (CWSRF-, SRL/SEL-funded projects) or NEPA (STAG-funded projects).

Within 30 days, Division staff will then complete a comprehensive review of the ER/EID to ensure that the project is conceptually sound and fulfills all SEPA requirements. For Major ERs/EIDs that will result in a FONSI/EA, the Division will coordinate with internal and external agencies during the review process.

Complete the entire submittal checklist for initial submissions and submit it as part of the ER/EID package. If it is not submitted, then IFS will not begin reviewing the ER/EID until the checklist is received.

While this mainly concerns the environmental review, the DWR Regional Offices review all ERs/EIDs. The Division's main responsibility is to ensure that reports go out and comments from the agencies come back in a timely manner. Once the initial review is finished, Division staff will prepare a comment package consisting of technical comments, environmental comments, and any agency comments. This package will be sent by e-mail to the LGU and their consultant. IFS will request return receipts, so please respond accordingly.

Once the LGU and consultant have received the comment package, they have 30 days by which to respond to the comments. Comments should be responded to on a comment-by-comment basis. If comments require text changes, then either place the text changes directly into the response or appropriately reference the text change in the ER/EID by section and/or page number, paragraph number, and line number. Be thorough in responding, and be sure to include responses to agencies. If the occasion arises where a comment may not be clear, please contact the review engineer or environmental assessment coordinator listed in the comment package cover letter. The cover letter will also specify the number of copies required.

At times during the environmental review, agencies may have concerns that require additional coordination. The Division will work with the LGU, consultant, and agency in a facilitative role to keep the review process going. Normally, the Division maintains a role as coordinator instead of directly being involved; however, that determination is made on a case-by-case basis.

Once the initial response package has been sent to the Division, an iterative process of comments and responses will begin where the LGU and consultant will work directly with the review engineer to resolve any remaining technical or environmental issues. If comments are deemed to be minor by the review engineer or environmental assessment coordinator, he or she may work with the LGU and consultant with changes being transmitted to and from IFS via e-mail and pages submitted in PDF format. All pages save for pages in the EID must be signed and sealed by the project engineer. If the issues remaining are deemed to be major, then a resubmittal of the full text of the ER/EID may be required. If this is the case, generally, three copies will need to be submitted to the Division. Additional copies may be required if other agencies have concerns. Please contact either the review engineer or the supervisor to verify the amount of copies to be submitted. When sending the revised ER/EID, include a submittal checklist for revised reports, which can be found in the Toolbox on the IFS website.

Once all technical and environmental issues are resolved, the LGU and/or consultant must submit both one hard copy of the ER/EID and one CD or DVD of the ER/EID. The hard copy will be stored in the IFS files until the project is closed out. The electronic copy will be stored in the file system indefinitely.

IFS will not draft an approval letter until the final hard copy and electronic copy of the ER/EID is received.

For Major ERs/EIDs, a FONSI/EA will be required.[7] If this is the case, then once all technical and environmental issues have been resolved, the environmental assessment coordinator will notify the LGU and consultant that the public meeting for the project can be held. Please see Section 2.2.9 for more information regarding this process. Once the public meeting has been held, then the FONSI will be drafted and sent to the State Clearinghouse (SCH) for a 30-day public review period. Once the review period is complete, the SCH will notify the Division that the project has completed review.

In almost all cases, there will be no comment from this review period. Occasionally, the SCH release memorandum will contain minor comments that can be addressed in the approval letter and permitting process that follows. In extremely rare instances, SCH may have a comment that warrants revision to the ER/EID. If this is the case, then the project will miss the deadline and have to reapply for funding.

If the project is a Minor ER/EID that requires a DMCA or CE as the environmental document, then both the approval letter and DMCA or CE will be drafted concurrently. The Division will send the approval package both to the LGU and the consultant via both e-mail and hard copy. A copy of the DMCA or CE will be posted on the Division's website. Additionally, the Division recommends that the LGU post a copy of the DMCA or CE on their website as well. If the project is a Major ER/EID, then the Division will send both an electronic version and hard copy of the approval letter, as the LGU and consultant should have received a copy of the FONSI/EA when it was sent to the SCH.

1.3.2.2   Community Block Development Program for Infrastructure

For the CDBG-I program, the environmental review and ER review are two completely separate processes. Information related to the environmental review process is available in guidance entitled Guidance for the *Preparation of Environmental Documentation related to the Community Block Development Block Grant – Infrastructure Funding Program* and is available on the Division's CDBG-I website along with other associated information.

The ER review process will follow the information related to wastewater and drinking water ERs. Regarding timelines, the same timelines and milestones listed in Table 1.1 apply save for the timelines associated with FONSI reviews. In other words, rather than five months to complete the ER, the LGU will have four months for CDBG-I projects, as the final month is related to review at the SCH.

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[7] In very rare cases, a project will require and EIS and a ROD. In these situations, please contact Division staff at the beginning of the process for public involvement information.

1.3.2.3   State Revolving Loan/State Emergency Loan, High Unit Cost Grant Programs

The ER/EID process for the SRL and HUC grant programs are similar to that for the CWSRF program. Additionally, to ensure that funds are distributed in a timely manner, projects with SRL, SEL, or HUC grant funding will follow a similar schedule to that of the CWSRF program (see Section 1.3.2.1). The type of environmental document prepared (approval, FONSI, or ROD) will be determined by the SEPA minor construction activities regulations (see Appendix B). This document is also available in the Toolbox.

> SRL or SEL projects with no activity by the Owner/Consultant for three months will be returned to the Owner, and they will have to reapply.

When submitting the package, include the following:

- Submittal Checklist.
- SEPA Minor Construction Activity Criteria worksheet.
- Six copies (Minor ER/EID) or 19 copies (Major ER/EID).

Like the CWSRF program, the SRL, SEL, and HUC grant programs fall under the purview of the SEPA; however, a DMCA will not be prepared if the project falls below the SEPA minor construction activities criteria, as the DMCA is specific to the CWSRF program.

If the project is a minor construction activity, then prepare a Minor ER/EID. If the project requires a FONSI or ROD, then prepare a Major ER/EID that has more detail because the potential impact may be greater. Section 1.4 contains more information related to the level of detail for Major and Minor ERs and EIDs.

1.4   Level of Detail Required for Engineering Reports/Environmental Information Documents

The level of detail used in the preparation of the ER/EID will vary depending on the type of environmental document that the Division will prepare. See the above funding program-specific ER/EID information section to determine if a major or minor ER/EID is required. ***Note that for the CDBG-I program, only a minor ER will be prepared.*** Also, the environmental review process is a separate process.

1.4.1   Engineering Reports/Environmental Information Documents

1.4.1.1   Minor Engineering Reports/Environmental Information Documents

Minor ERs/EIDs consist of a set of tables for the body of the report with supplemental information provided in appendices. Additionally, minor ERs/EIDs require that the methodologies set forth in this guidance be followed. The tabular format allows for an efficient review of the project by Division staff and enables a fast turnaround of comments.

> Engineering Report/Environmental Information Document – A document written by the Consultant that provides information about the engineering aspects of the project on a conceptual level, its purpose and need, alternatives considered, current conditions, potential environmental impacts, and mitigative measures taken to minimize impacts.

For projects below the minor construction activities requirements or EPA criteria, the LGU and Consultant may wish to use other methodologies than the ones set forth in this guidance. If this is the case, then the Major ER/EID format must be followed.

1.4.1.2 *Major Engineering Reports/Environmental Information Documents*

The Major ER/EID must adhere to the information presented in the guidance; however, because the ER/EID is a Major ER/EID, other methodologies may be used. If other methodologies are used, then the information requested in the various sections of the ER/EID guidance must be followed. Also, Major ERs/EIDs must contain more detail than the tabular format allowed in Minor ERs/EIDs.

For example, for the future population analysis for wastewater treatment/expansion/construction below the minor construction activities criteria requires a tabular presentation of the data via the methodology described in Section 3.0. If a project of the same type were above the minor construction activities, then the Consultant would have to supply more information about how the population projections were derived (including assumptions), especially if they used a different methodology.

1.4.2 **Environmental Documents**

In addition to a technical review, the required to conduct an environmental review to fulfill the requirements of SEPA for the CWSRF, DWSRF, SRL, SEL, and HUC grant programs. This section explains the types of environmental documents that may be prepared by the Division at the end of the technical and environmental review process. ***Note: This section does not apply to the CDBG-I program, as the environmental document preparation process for this program is a separate process than the ER process.***

> Environmental Assessment – A document prepared by IFS that provides a summary of the information discussed in the EID. The EA is attached to the FONSI when it is submitted to the Clearinghouse.

The ER/EID is reviewed by the Division as well as several regulatory agencies. Upon completion of the review, one of the following documents is prepared depending on the size and impacts of the project:

- Determination of Minor Construction Activity (CWSRF only)
- Categorical Exclusion (DWSRF only)
- Finding of No Significant Impact (CWSRF, DWSRF, SRL, SEL, HUC)
- Record of Decision (CWSRF, DWSRF, SRL, SEL, HUC)

Projects that do not meet SEPA minor construction activities are subject to a more extensive review process. If the review demonstrates impacts from the project will not have significant impact to the environmental and natural resources, a FONSI is issued for the project. The FONSI is accompanied by an environmental assessment (EA), which supports the conclusion that the project will not have any impacts. The EA, which is based on the EID, describes the planned project, the existing environment, potential impacts, and mitigative measures and is written by Division staff. The information provided in the EID enables the Division to write the

EA. Figure 1-3 shows a flowchart used to determine what kind of environmental document the Division will prepare.

If the review indicates that impacts from the project have the potential to be significant, then the consultant must prepare an environmental impact statement (EIS) based on that review. The EIS is similar to the EID but provides more detail, including extensive evaluation of the project's direct, secondary, and cumulative impacts. (See Section 12.1.2) for an explanation of the types of impacts.) The EIS is reviewed in draft and final stages and then a ROD is prepared by the Division to document decisions made and planned actions based on the environmental review.
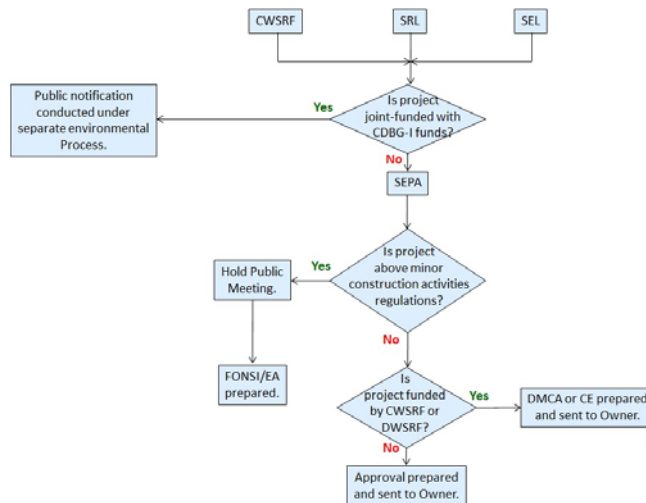

Figure 1.3. Flowchart for Public Participation and Environmental Documents

1.5   Additional Guidance (for projects co-funded with USDA funds only)

In some situations, projects funded by IFS may be co-funded by the United States Department of Agriculture (USDA). Because of the USDA's funding requirements, their ER guidelines have additional requirements. For these co-funded projects, ensure the additional requirements found in the USDA guidance are also provided in the ER/EID. Doing so will allow for both agencies to complete their reviews in an efficient manner. For the additional sections required by the USDA guidance, make it clear that the information is provided for USDA funding purposes only.