

Requirements for Environmental Narrative (only required from those applicants seeking assistance with construction projects that EDA deems 'merit further consideration')

The National Environmental Policy Act (NEPA) requires federal agencies to assess the expected environmental impacts associated with proposed federal actions. EDA cannot make an award unless it has received sufficient information to make a determination regarding a project's environmental impact.

EDA may request detailed information from the applicant (generally referred to as an 'environmental narrative') in the course of the agency's review to obtain an understanding of the present environmental condition and the project's elements that will affect the environment. Upon request, the applicant must provide detailed, comprehensive information for the: (a) site(s) where the proposed project facilities will be constructed and the surrounding areas affected by its operation; and (b) areas to be affected by any primary beneficiaries of the project. The information submitted must be sufficient to evaluate all reasonable alternatives to the proposed project, the direct and indirect environmental impacts, as well as the cumulative impacts on the environment as defined in the regulations for implementing the procedural provisions of NEPA (see 40 C.F.R. parts 1500-1508). The level of detail should be commensurate with the complexity and size of the project, and the magnitude of the expected impact. Previously completed environmental impact documentation (assessments, impact statements, etc.) for activities in the region in which the proposed project will be located may be attached to environmental narrative.

Upon request, applicants must provide information on the items listed below; there is no specific template for this information, but the submission must be of sufficient detail to enable EDA to complete its review. In all cases in which the applicant asserts that an item is not applicable, the applicant must explain the reason(s) for this assertion. Applicants are encouraged to contact the applicable EDA regional office with questions.

**Applicants must provide information on the following items in the environmental narrative:**

1. Beneficiaries

Identify any existing businesses or major developments that will benefit from the proposed project, and those which will expand or locate in the area because of the project.

2. Area Description

Describe the general project area, including topography, economic history, historic land usages, unique geologic features, etc. In addition to maps, which may have been submitted as preliminary proposal exhibits and which should be updated if necessary, attach the following:

a. The FEMA flood plain and USGS topographic maps with legend(s), showing the project location and boundaries, existing and proposed project components and location of all sites and/or companies benefiting from the proposed project. The document should be of sufficient size and clarity for adequate interpretation of the applicant's intentions (originals are preferred).

b. Site photos and/or an aerial photograph of the site, if available.

### 3. Alternatives to the Proposed Project

Provide a detailed description of alternative actions which were considered during project development processes (e.g., alternative locations, designs, other projects having similar benefits, or a "no project" alternative), and explain why this project/site was selected as the preferred alternative with respect to the other choices.

### 4. Shorelines, Beaches and Dunes, Estuary, Wetlands and Floodplains

Identify any shorelines, beaches, dunes, estuaries, wetlands, or flood plain areas located within or adjacent to the project site(s). Indicate potential impact from proposed project activities and specify proposed measures to mitigate probable impacts. Contact the U.S. Army Corps of Engineers/U.S. Fish and Wildlife Service concerning any wetland resources in or near the project location. If wetlands are impacted, a permit from the U.S. Army Corps of Engineers may be required. Indicate if the applicant participates in the National Flood Insurance Program.

### 5. Vegetation and Wildlife Resources

Identify native vegetation and wildlife found in the project area or its immediate vicinity.

a. Identify any designated State and National Parks, or National Game Preserves located on or in the vicinity of the proposed project activities.

b. Identify any Wilderness Areas, as designated or proposed under the Wilderness Act, or wild or scenic rivers, as designated or proposed under the Wild and Scenic Rivers Act, that are located on or in the vicinity of the proposed project activities.

### 6. Endangered Species

Identify any endangered or threatened species of plants or animals, or critical habitats that have been identified in the project site(s) or its immediate vicinity. Contact the U.S. Fish and Wildlife Service and request comments on your proposal for EDA investment assistance.

### 7. Land Use and Zoning

Describe the present formal zoning designation and current land use of the specific project site and adjacent land parcels. These areas include the site of construction activities, adjacent areas, and areas affected by the primary beneficiaries. Land uses

to be considered include, but are not limited to, industrial, commercial, residential, agricultural, recreational, woodlands, mines/quarries, and open spaces.

Identify agriculture land parcels designated as "prime/unique agricultural lands" by the U.S. Department of Agriculture under the Federal Farmlands Protection Act or a local equivalent.

#### 8. Solid Waste Management

a. Indicate the types and quantities of solid wastes to be produced by the project facilities and primary beneficiaries.

b. Describe local solid waste collection and disposal methods, and their expected useful life.

c. Indicate if recycling or resource recovery programs are or will be used.

#### 9. Hazardous or Toxic Substances

a. Describe any toxic, hazardous, or radioactive substances which will be utilized or produced by the proposed project facilities and primary beneficiaries.

b. Describe the manner in which these substances will be stored, used or disposed.

c. Complete and sign the "Applicant Certification Clause" (see Appendix A).

#### 10. Water Resources

Describe surface or underground water resources at or near the project sites.

#### 11. Water Supply and Distribution Systems

Indicate the source, quality, and supply capacity of local domestic and industrial/commercial water resources, and the amount of water that project facilities and primary beneficiaries are expected to utilize.

#### 12. Wastewater Collection and Treatment Facilities

a. Describe all domestic class or process waste waters or other discharges associated with the project facilities and its primary beneficiaries, and the expected composition and quantities to be discharged either to a municipal system or to the local environment.

b. Describe the wastewater treatment facilities available for processing the additional effluent and indicate their design capacities and current loading, and their adequacy in terms of the degree and type of treatment required. Indicate all discharges which will require on-site pretreatment. Local treatment systems are or will be inadequate or overloaded, describe the steps being taken for necessary improvements and their completion dates.

c. Describe any induced changes in local surface water runoff patterns, and the status of storm water discharge permit process.

#### 13. Environmental Justice (Executive Order 12898)

Will this project result in disproportionate adverse human health or environmental impacts relative to minority and low income populations? If so, please explain.

#### 14. Streets, Traffic, Parking

a. Briefly describe the local street/road system serving the project sites and describe any new traffic patterns that may arise because of the project.

b. Indicate if land use in the vicinity, such as residential, hospital, school or recreational, will be affected by these new traffic patterns.

c. Indicate if any existing capacities of these transportation facilities will be exceeded as a direct or indirect result of this project implementation, particularly in terms of car and truck traffic.

#### 15. Air Quality

a. Is the proposed project site classified as a "non-attainment" area for any criteria pollutants? If yes, indicate types and quantities of air emissions (including odors) to be produced by the project facilities and its primary beneficiaries, and any measures proposed to mitigate adverse impacts.

b. Indicate any local topographical or meteorological conditions that hinder the dispersal of air emissions.

#### 16. Noise Pollution

Will operation of project facilities or primary beneficiaries' facilities increase local ambient noise levels? If yes, indicate the areas to be affected.

#### 17. Construction

Describe methods to be employed to reduce adverse impacts from construction, such as noise, dust generation, soil erosion and siltation.

#### 18. Permits

Identify any federal, State, or local permits of an environmental nature needed for the project (e.g., U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, Coastal Zone Management/Shoreline Management, Air Quality, State Environmental Policy Act, etc.), and the status of any such permits. Attach copies of any such permits.

#### 19. Public Notification/Controversy

- a. Provide evidence of the community's awareness of the project, such as newspaper articles or public notification and/or public meetings, as applicable.
- b. If a formal public hearing has been held, attach a copy of the transcript.
- c. Fully describe any public controversy or objections which have been made concerning this proposed project and discuss steps taken to resolve such objections.

20. Cumulative effects (the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency or person undertakes such actions (40 C.F.R. § 1508.7)).

- a. Identify direct and indirect effects of the proposed action;
- b. Which resources, ecosystems, and human communities are affected; and
- c. Which effects on these resources are important from a cumulative effects perspective.

## **B. Historic/Archaeological Resources**

Identify any known historic/archeological resources within the project site(s) that are either listed on the National Register of Historic Places or considered to be of local and State significance and perhaps eligible for listing on the National Register.

Applicants are required to provide the State Historic Preservation Officer (SHPO) with (i) a narrative description of the project's elements and its location; (ii) a map of the area surrounding the project, which identifies the project site, adjacent streets and other identifiable objects; (iii) line drawings or sketches of the project; and (iv) photographs of the affected properties if building demolition or renovation is involved.

**Note that the applicant should only contact the SHPO after EDA has indicated that the proposed projects merits further consideration.**

Additionally, the SHPO must be requested to submit comments on the proposed project to the appropriate EDA regional office. If comments from the SHPO have been received, they should be attached.

Appendix A: Applicant Certification Clause

The applicant represents and certifies that it has used due diligence to determine that the description of the project site described herein is accurate with respect to the presence or absence of contamination from toxic and hazardous substances. The term "site" includes the entire scope of the project, including future phases of the project and all areas where construction will occur.

1. Is the site currently, or has it in the past 50 years, been used for any of the following operations or activities:

a. Generation of hazardous substances or waste?

Yes  No

b. Treatment, storage (temporary or permanent), or disposal of solid or hazardous substances or waste?

Yes  No

c. Storage of petroleum products?

Yes  No

d. Used/waste oil storage or reclamation units?

Yes  No

e. Research or testing laboratory?

Yes  No

f. Ordnance research, testing, production, or storage?

Yes  No

g. Chemical manufacturing or storage?

Yes  No

h. Military weapons or ammunition training or testing?

Yes  No

i. Iron works/foundry?

Yes  No

j. Railroad yard?

Yes  No

k. Industrial or manufacturing operation?

If any of the above operations ever occurred at the site, and if appropriate cleanup or other mitigation actions were performed in accordance with the local, State, and federal laws, please attach documentation of these actions.

2. Do wells draw water from an underlying aquifer to provide the local domestic water supply?

Yes  No

3. Has a federal, State, or local regulatory authority ever conducted an environmental assessment, environmental impact statement, or a preliminary assessment/site inspection, or similar environmental surveyor inspection report at the site? If yes, please attach copies of these reports or results.

Yes  No

4. Have any environmental or OSHA citations or notices of violation been issued to a facility at the site? If yes, please attach copies.

Yes  No

5. Have any unauthorized releases of hazardous substances occurred at any facility at the site which resulted in notification of the EDA's National Response Center?

Yes  No

6. Is any material containing asbestos located at the site? If yes, please attach information concerning State and federal regulatory compliance.

Yes  No

7. Is there any equipment (electrical transformers, etc.) containing polychlorinated biphenyls (PCB) on the site? If yes, please attach a description of the equipment.

Yes  No

8. Are there underground storage tanks on the site? If yes, please attach a detailed description, including the number of underground storage tanks on the site, whether the tanks have been inspected (or removed) and the results of such inspections.

Yes  No

9. Has the site been tested for radon? If yes, please attach results.

Yes  No

10. Have there been or are there now any environmental investigations by federal, State or local government agencies that could affect the site in question? If yes, please attach available information.

Yes

No

The applicant acknowledges that this certification regarding hazardous substances and/or waste is a material representation of fact upon which EDA relies when making and executing an award. EDA reserves the right to terminate any award made in conjunction with the representations contained herein if, at any time during the useful life of the project, EDA becomes aware of the presence of hazardous materials or waste at the site, or that hazardous materials or waste have been inappropriately handled thereon.

Further, if it is determined at any time that the presence of hazardous materials or waste, or handling thereof, has been misrepresented, EDA may pursue other available legal remedies against the applicant.

Applicant Name \_\_\_\_\_

Name and title of applicant's authorized representative \_\_\_\_\_

Signature of applicant's authorized representative \_\_\_\_\_

Date signed \_\_\_\_\_