



# ROUND UP THE USUAL SUSPECTS: COMMON DEFICIENCIES IN US EIAs



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# **THE USUAL SUSPECTS:**

## **Project Description**

- 
- Incomplete Project Description
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- Piecemealed (Segmented) Description
  - Inconsistent or Unstable Description



# **THE USUAL SUSPECTS: Affected Environment/Baseline/Setting**

- 
- Incomplete Description of Setting
- 
- Erroneous Baseline (Spatial & Temporal)
  - Use of Plan Buildout vs. Existing Conditions Baseline


# THE USUAL SUSPECTS: Project Effects/Environmental Impacts

- Incomplete Impacts Analysis
- Omitted Impacts Analysis
- Inaccurate Impacts Analysis
- Skewed/Biased Impacts Analyses
- Conclusatory Impacts Analyses
- Deferred Impacts Analyses





# THE USUAL SUSPECTS:

## Impacts (continued)

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- Skewed or Biased Significance Criteria
  - Impact Conclusions Don't Match Analyses
  - Inadequate Consideration of Short-term Impacts
  - Inadequate Consideration of Long-term Impacts (including sustainability)
  - Inadequate Consideration of Cumulative Impacts





# THE USUAL SUSPECTS: Mitigation

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- Incomplete or Omitted Mitigation Measures
  - Imprecise or Vague Mitigation Measures
  - Measures Lacking Teeth or Commitment
  - Unenforceable Mitigation Measures
  - Un-monitorable Mitigation Measures




# THE USUAL SUSPECTS: Alternatives

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- “Straw-man” Alternatives
  - Alternatives that Don’t Mitigate
  - Inadequate Range of Alternatives
  - Partial Alternatives (mitigation)
  - Inappropriate No Project/No Action Alternative



# THE USUAL SUSPECTS: Process & Procedure


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- Inappropriate Use of Screening Documents to avoid Full EIA
  - Inadequate Noticing (public & agencies)
  - Inadequate Review Periods
  - Inadequate Responses to Comments
  - Substantial New Information added in Response to Comments





# THE USUAL SUSPECTS:

## Stragglers

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- EIA Data Dumps
  - Incomprehensible Jargonistas
  - Internal Inconsistencies