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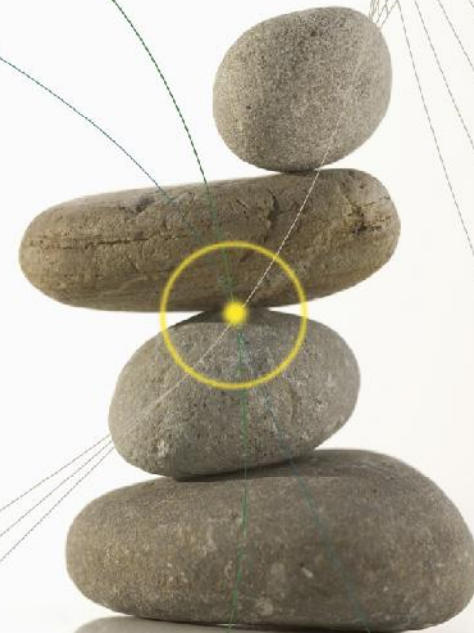


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# Alternatives Discussion

December 9, 2010

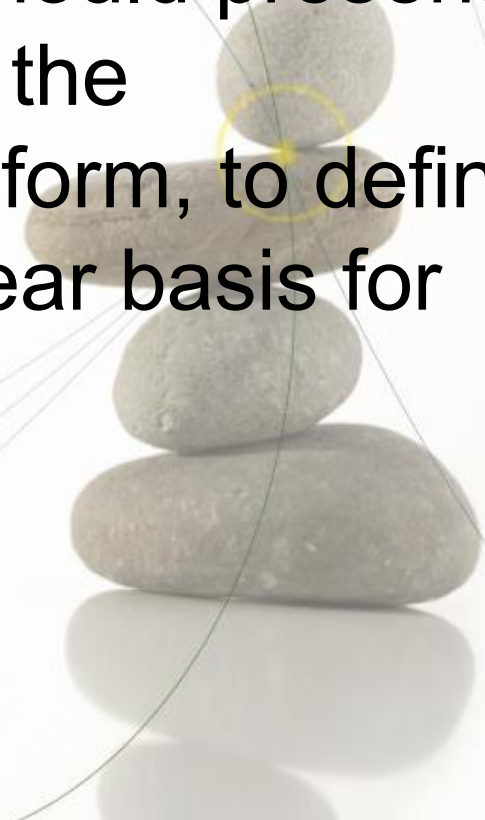


# Alternatives

- Identifying and studying alternatives to a proposal is the key to the NEPA process' objective of finding solutions that help preserve and protect the value of environmental and community resources

# Alternatives

- Evaluation of alternatives should present the proposed action and all the alternatives in comparative form, to define the issues and provide a clear basis for choice among the options.



# CEQ Requirements

- In its regulations implementing NEPA, the Council on Environmental Quality (CEQ) calls the alternatives analysis section the "heart of the EIS", and require that agencies shall:
  - a) Rigorously explore and objectively evaluate all reasonable alternatives and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

# CEQ Requirements

- b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.
- c) Include reasonable alternatives not within the jurisdiction of the lead agency.
- d) Include the alternative of no action.

# CEQ Requirements

- e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.
- f) Include appropriate mitigation measures not already included in the proposed action or alternatives.

# EARIP Alternatives

- Remember, the EIS is the document the USFWS must use in their decision of whether or not to issue the permit
- The federal action is to issue the permit
- “No Action” is to not issue the permit



# EARIP Alternatives

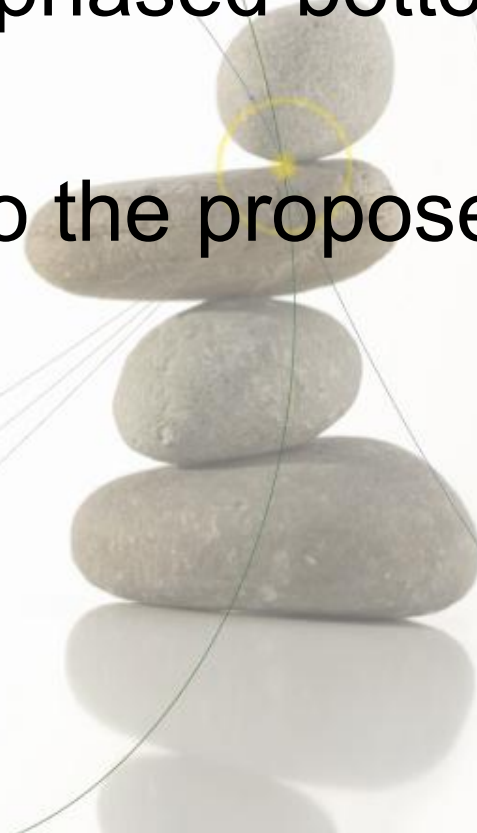
The EARIP HCP EIS will focus on

- The proposed action (i.e., the EARIP HCP)
- “Reasonable” alternatives to the proposed action



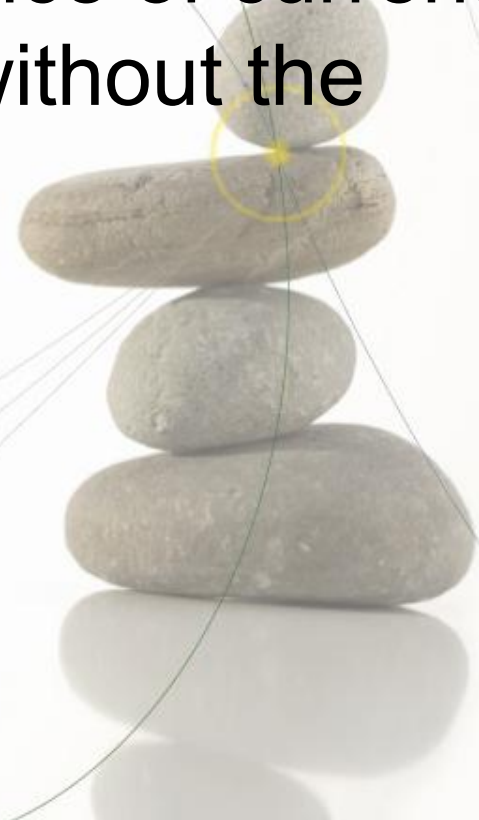
# EARIP Alternatives

- The proposed action is the phased bottom up approach
- “Reasonable” alternatives to the proposed action include:
  - Recharge and Recirculation
  - Large ASR



# EARIP EIS Alternatives

- No Action – is the continuance of current policies and management without the benefit of a 10(a) coverage



# Other Alternatives

- Cover all potentially affected aquifer species and mussels
- Combine with regional land based HCPs
- Individual HCPs for EAA, New Braunfels, San Marcos, other affected parties