



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

AUG 20 2019

In Reply Refer To:
FWS/AWSR/POP-BPOL/FR00003393

To: Service Directorate

From: Principal Deputy Director 

Subject: Process to use the National Oceanic and Atmospheric Administration
Programmatic Environmental Impact Statement for Coastal Restoration Projects

The Wildlife and Sportfish Restoration Program (WSFR) and Regions 1 and 8 have completed the process on behalf of the U.S. Fish and Wildlife Service (Service) to adopt the National Oceanic Atmospheric Administration Restoration Center (NOAA-RC) Programmatic Environmental Impact Statement (PEIS) for coastal restoration projects. The PEIS covers a comprehensive suite of habitat restoration activities in coastal and marine environments (e.g., fish passage improvements, hydrologic/tidal reconnection, freshwater wetland restoration, living shorelines and shellfish restoration, coral recovery, saltmarsh and barrier island restoration, removal of invasive species and marine debris). These activities are similar to and often complement those implemented by the Service through its technical and financial assistance programs. Service projects that fit the project and impact descriptions in this PEIS would be subject to a streamlined review to meet compliance requirements under the National Environmental Policy Act (NEPA).

The Service's adoption of this PEIS promotes efficient NEPA compliance for Service-supported coastal restoration activities and projects that do not generate significant impacts to the human environment and are of little or no controversy. Project-specific compliance with all Federal, State, and local laws must be documented prior to undertaking restoration actions described in the PEIS.

The Service has assembled a Coastal PEIS Review Team (Review Team) to screen and track projects proposed for coverage with the PEIS (Attachment 1). Review Team members are experts in coastal restoration concepts and outcomes and are committed to ensuring the diligent application of this newly adopted PEIS. The Review Team will assess and document whether the proposed habitat restoration actions fall within the range of alternatives and potential environmental consequences analyzed in the PEIS and will not have significant adverse impacts. Region 1 has offered to lead the Review Team for a two-year period to launch the use of the PEIS. This role could rotate to another Region or Program in the future depending on workload and use of the PEIS.

If you have any questions, please contact the Pacific Northwest Regional WSFR Chief, Ms. Kathy Hollar at (503) 231-6257.

Attachment

Process for use of the PEIS

1. The Service project biologist assessing his/her NEPA compliance options reviews the PEIS located at: <https://www.fisheries.noaa.gov/resource/document/restoration-center-programmatic-environmental-impact-statement>, as well as Appendix A of the USFWS Record of Decision (ROD).
2. The project biologist uses the Inclusion Analysis Form to assess whether or not their project qualifies for coverage under the PEIS. This documentation will become part of the administrative record for the project.
 - a. If the analysis demonstrates that the project fits within the scope and analysis of the PEIS, the project biologist finalizes Sections I – IV of the “USFWS / NOAA RC PEIS Inclusion Analysis Form” (attached and also available from any Review Team member) and sends it to the PEIS Review Team Lead.*
 - b. If the analysis shows that the project falls outside the scope covered by the PEIS, the project biologist will conduct additional NEPA review as required by law, and as indicated in the PEIS. In these cases, the Inclusion Analysis Form will not be submitted to the PEIS Review Team Lead *, as the project biologist has already determined that the project is not covered by the PEIS.
3. The Review Team Lead or delegated Review Team member will review the inclusion checklist. Within two weeks, the Review Team Lead or assigned member will inform the requesting project biologist of the review results.
 - a. If the Review Team concludes that the project is covered by the PEIS, the project biologist will send the Inclusion Analysis form to the NEPA signatory authority/decision maker for the project (typically the Office Supervisor or Project Leader) for approval of Section V. The project biologist will maintain the Review Team’s concurrence in the project files.
 - b. If the Review Team concludes that the project has unknown impacts or the actions or impacts are not covered by the analysis within the PEIS, the team will notify the project biologist and the NEPA signatory authority/decision maker for the project (typically the Office Supervisor or Project Leader) for completion of the correct determination in Section V. The project biologist will maintain the Review Team’s concurrence in the project files, and conduct further NEPA review as indicated by the determination, and as required by law.
4. The assigned Review Team member will complete the shared electronic tracking sheet identifying the projects covered by the PEIS.
5. The Review Team Lead will establish a webpage that describes the system used to track usage of the PEIS. The Review Team will update the webpage with a list of the actions that were covered by the PEIS, fulfilling the requirement that a record of the Service’s use of the PEIS will be available to the public.

*The current Coastal PEIS Review Team consists of:

Team Lead: Region 1 WSFR National Coastal Wetland Grant Manager (Heidi Nelson)

Region 1 Ecological Services Coastal Program Coordinator (Holly Freifeld)

Region 8 WSFR Chief (Larry Riley)

Region 4 WSFR National Coastal Wetlands Grant Coordinator (Jim Duffy)

HQ WSFR National Coastal Wetland Grant Program Coordinator (Paul Van Ryzin)

Record of Decision
Department of the Interior, US Fish and Wildlife Service
for the adoption of the Final NOAA Restoration Center's Programmatic
Environmental Impact Statement for Coastal Habitat Restoration

Summary

In compliance with the National Environmental Policy Act (NEPA, 42 U.S.C. § 4321 et seq.), this Record of Decision documents the U.S. Fish and Wildlife Service's (Service) adoption of the Programmatic Environmental Impact Statement (PEIS) for coastal habitat restoration activities developed by the National Oceanic and Atmospheric Administration Restoration Center (NOAA RC). NOAA RC developed the PEIS in 2015 to evaluate coastal habitat restoration activities funded or implemented through its existing programs. The on-the-ground restoration activities evaluated in the PEIS are similar to, and often allied with, those implemented by the Service through its analogous programs. In addition to activities for riverine and coastal restoration, the 2015 PEIS also analyzes technical assistance activities and conservation transactions. The Service will not use those components of the PEIS, only the components that address restoration.

The 2015 PEIS expanded and updated similar analyses that NOAA RC conducted for an earlier Programmatic Environmental Assessment (PEA) and Supplemental Programmatic Environmental Assessment (SPEA) published in 2002 and 2006, respectively. Since adoption, NOAA has effectively applied the 2015 PEIS to hundreds of projects, achieving greater efficiency and effectiveness. Service adoption of this PEIS will streamline the NEPA process for regularly conducted, on-the-ground, riverine and coastal restoration projects supported by the Service by minimizing redundant processes while assuring compliance with NEPA on projects that do not generate significant deleterious impacts to the human environment and that are of little or no controversy.

The NOAA RC PEIS analyzed a suite of restoration activities that have been shown to effectively conserve and restore coastal and marine habitats and ecosystems. Fish passage improvements, hydrologic/tidal reconnection, freshwater wetland restoration, shellfish restoration, coral recovery, saltmarsh and barrier island restoration, coastal erosion prevention, debris removal, and invasive species removal are among the most common project types implemented by NOAA RC and the Service through their respective assistance programs. The purpose, scope, geographic locations, and activities that NOAA RC evaluated also characterize many of the projects implemented in coastal landscapes through Service programs, including those implemented through financial assistance to partners.

In November 2016, the Environmental Protection Agency published a notice in the *Federal Register* (81 FR 85221) announcing the Service's planned adoption of the NOAA RC PEIS. The NOAA RC PEIS complies with all Council on Environmental Quality (CEQ), Department of the Interior, and Service requirements for preparing an Environmental Impact Statement (EIS).

Restoration Activities Analyzed and Covered by NOAA RC PEIS

Coastal restoration activities commonly implemented by the NOAA RC and the Service are described in eleven sections of the NOAA RC PEIS. NOAA RC and the Service have many years of experience with each of these activities, and the two agencies frequently collaborate on coastal restoration projects of shared interest and jurisdiction. Project implementation often employs several of the actions in combination for achievement of restoration objectives. Full descriptions of the activities are included in Section 2 of the PEIS.

- 1) Beach and dune restoration (see PEIS section 2.2.2.1)
- 2) Debris removal (see PEIS section 2.2.2.2)
- 3) Fish passage (see PEIS section 2.2.2.3)
 - dam and culvert removal, modification, or replacement
 - technical and nature-like fishways
- 4) Fish, wildlife, and vegetation management (see PEIS section 2.2.2.4)
 - invasive species control
 - prescribed burns and forest management
 - species enhancement
- 5) Freshwater stream restoration (see PEIS section 2.2.2.5)
 - channel restoration
 - bank restoration and erosion reduction
- 6) Reefs (see PEIS section 2.2.2.6)
 - coral reef restoration
 - shellfish reef restoration
 - artificial reefs
- 7) Road upgrading and decommissioning; trail restoration (see PEIS section 2.2.2. 7)
- 8) Signage and access management (see PEIS section 2.2.2.8)
- 9) Subtidal planting (see PEIS section 2.2.2.9)
 - submerged aquatic vegetation
 - marine algae
- 10) Water conservation and stream diversion (see PEIS section 2.2.2.10)
- 11) Wetland restoration (see PEIS section 2.2.2.11)
 - levee and culvert removal, modification, and set-back
 - fringe marsh and shoreline stabilization
 - sediment removal
 - sediment/material placement
 - wetland planting

Decision Options Considered

1) PREFERRED ALTERNATIVE, Service adopts NOAA RC PEIS and implements streamlined programmatic NEPA process for coastal habitat restoration projects.

After detailed study of the NOAA RC PEIS, the Service recognized the potential efficiencies of the programmatic approach to NEPA compliance afforded by Service adoption of the NOAA RC PEIS. Review and analysis time and costs will be reduced significantly with no reduction in commitment to national environmental policy and human quality of life. Additionally, because fish and wildlife habitat restoration projects are undertaken by the Service for the broad purpose of *improving* the natural and human environments, most of the Service's site-specific, on-the-ground restoration actions are found, upon detailed, site-specific analysis, to have no potential for significant deleterious impacts to those environments. NOAA RC has had similar experience with its coastal restoration actions and developed the PEIS to analyze successful categories of restoration actions and develop specific implementation practices to minimize even short-term negative impacts and maximize long-term benefits to the natural and human environments through improved function in coastal ecosystems. Since its adoption four years ago, NOAA has applied this PEIS to hundreds of projects with no controversy, saving staff time and other resources as a result.

2) NO-ACTION ALTERNATIVE, Service maintains current NEPA processes.

Currently the Service conducts individual NEPA analyses of site-specific restoration actions. Technical assistance and small restoration projects (culvert removal, for example) often are covered by one or more Service or Department of Interior (DOI) Categorical Exclusions (CE), while larger or more complex projects often require more in-depth analyses resulting in an Environmental Assessment (EA) or an EIS. These detailed compliance efforts can be time-intensive and costly, often delaying environmental benefits and reducing funds for project implementation. Maintaining this action-by-action processing results in no change to the Service's existing NEPA compliance strategy.

Public Comment

During the draft PEIS public comment period NOAA RC received 10 comments that addressed 33 topics. The topics ranged from suggestions for additional covered activities, to comments on resources missing from the analysis, to support for the preferred alternative. Comments were received from non-profit organizations, government agencies (federal and state), for-profit organizations, and individuals. Summarized comments are presented in Chapter 5.0 of the PEIS, with a full list of comments included in Appendix B of the PEIS. The final NOAA RC PEIS was published in the *Federal Register* on June 19, 2015, at 80 FR 35305.

The Service published its Notice of Intent to Adopt the NOAA RC PEIS on November 26, 2016 and invited agency and public comment for this adoption action (81 FR 85221, [EIS No. 20160280]). The 30-day comment period for this action ended December 27, 2016; the Service received no comments on the proposed adoption.

Environmentally Preferable Alternative and Rationale for Selection

The Service analyzed the two decision alternatives described above and determined that Alternative I (adopting the NOAA RC PEIS) is the environmentally preferable alternative. This alternative achieves the Service's mission objective of delivering a broad range of coastal habitat restoration projects to benefit trust species and local communities while streamlining NEPA compliance. The preferred alternative enables the Service to maintain a high level of efficiency and flexibility for its habitat restoration and financial assistance programs. With no negative public comments received during NOAA RC's PEIS development process and no public comments received during the Service's adoption scoping, the Service is confident that adoption of the NOAA RC PEIS and institution of the streamlined NEPA approach will achieve strong cost and time efficiencies while preserving strong national, regional, and local commitments.

Minor Corrections to the NOAA RC PEIS

The review associated with the Service's adoption of the NOAA RC PEIS revealed several inconsistencies in the PEIS. These are discrepancies between text and tabular summaries of effects of several activities on some resources. While important to note, the Service has determined that these inconsistencies represent translation or editorial errors and do not detract or diminish from the robust and nature of the analysis itself. These discrepancies are detailed and addressed in Appendix A of this ROD.

Monitoring and Mitigation Measures

The Service works with partners to monitor and evaluate coastal habitat restoration projects to determine and document success of implementation and effectiveness. Construction monitoring is employed as needed to ensure covered restoration actions are carried out as designed. This monitoring may include review of as-built topography or bathymetry or documentation of other structural components of the project such as initial survival of outplantings or final water levels. When appropriate, effectiveness monitoring is initiated following construction to assess the mid- or long-term ecological success of restoration actions and to assess progress toward the desired outcomes of a covered project. Effectiveness monitoring evaluates ecological benefits and/or performance of new techniques and thus guides site-specific adaptive management, informs future Service priorities and project selection, improves Service programs, and advances restoration practice.

All practicable means to avoid or reduce adverse impacts from implementing the preferred alternative will be adopted through best management practices or mitigation measures described in Section 4 (action-specific) and Appendix D (general, used across multiple restoration activities) of the PEIS for each activity type. These practices are not an exhaustive list of best practices used in Service programs but are practices that were considered in the analysis of impacts during development of the PEIS. Project-specific compliance with all Federal, State, and local laws must be documented prior to undertaking restoration actions described in the PEIS. Federal environmental compliance requirements are site- and project-specific, and can

include the Endangered Species Act, the Magnuson-Stevens Fishery Conservation and Management Act, the Marine Mammals Protection Act, the Migratory Bird Treaty Act, the National Historic Preservation Act, the Clean Water Act, the Rivers and Harbors Act, and the Coastal Zone Management Act, among others.

Implementation Strategy

The Service will institute a consistent screening process for use of the PEIS. Project managers will complete a “USFWS / NOAA RC PEIS Inclusion Form” to concisely determine and document if the proposed project activities and site-specific environmental consequences are within ranges analyzed in the PEIS, and that extraordinary, site-specific circumstances would not elevate negative project or activity impacts to a level of significance. This form will be submitted for review to a Service team familiar with coastal restoration concepts and outcomes and committed to diligent application of the NEPA process. Using the analyses provided in the NOAA RC PEIS and additional information as necessary the review team will assess and confirm that the proposed habitat restoration actions, including those funded through financial assistance actions, are within the range of alternatives and potential environmental consequences analyzed in the PEIS and will not have significant adverse impacts on the natural or human environments. Upon review team recommendation, the NEPA signatory authority for the requesting Service unit will sign and date the inclusion form and notify the requesting program or project manager in writing of NEPA coverage for the proposed action(s). This analysis and authorization will be documented in project files maintained by program staff at the Service’s Regional and Field Offices. Documentation of the Service’s use of the PEIS for analysis and NEPA compliance for projects will be made available to the public.

National Environmental Policy Act Compliance

The Service used the NEPA process to guide our decision to adopt the NOAA PEIS for coastal restoration activities. Per NEPA guidelines, the Service reviewed the direct, indirect, and cumulative impacts of adopting the NOAA PEIS before making this decision. The Service adopted the NOAA PEIS and informed the public of the proposed action, alternatives to that action, the environmental impacts of the alternatives, and measures to minimize adverse environmental effects. Future site-specific restoration activities the Service proposes that are not within the scope of environmental consequences considered in this PEIS will require additional and separate NEPA review and analysis.

Secretarial Order 3355 Compliance

Secretarial Order 3355 does not apply. Issued August 31, 2017, SO 3355 establishes page and time limits for the development of EISs prepared by Department of Interior Bureaus and Offices serving as a lead agency for the purposes of NEPA. As the PEIS was developed by NOAA (Department of Commerce) and was finalized in 2015, it is not subject to the limitations imposed by SO 3355. Additionally, the Service’s adoption of another agency’s EIS is not within the scope of SO 3355.

Authorities

This Record of Decision was developed in accordance with NEPA (42 U.S.C. § 4321 et seq.), the CEQ's regulations for implementing NEPA (40 CFR parts 1500 through 1508), and the Department of the Interior's NEPA regulations (43 CFR part 46).



8-20-19

Principal Deputy Director
Exercising the Authority of the Director
for the U.S. Fish and Wildlife Service

Date

APPENDIX A

This table depicts noted translation and editorial inconsistencies contained within the NOAA PEIS, presented here as a revision to Table 11 located on pages 91 - 104. **

Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Beach and Dune Restoration (Section 4.5.2.1)	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse		
		Direct	Long-term	Localized	Moderate	Beneficial		
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Air</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Short-term	Beyond Project Site	Minor	Adverse		
		Direct	Long-term	Beyond Project Site	Major	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short-term	Beyond Project Site	Minor	Adverse		
		Direct	Long-term	Beyond Project Site	Major	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct & Indirect	Long-term	Localized	Minor	Adverse & Beneficial		
<i>Land Use and Recreation</i>	Indirect	Short-term	Localized	Minor	Beneficial			
<i>Socioeconomics</i>	Direct & Indirect	Long-term	Localized	Moderate	Beneficial			
Debris Removal (Section 4.5.2.2)	<i>Geology and Soils</i>	Direct	[Short-term & Long-term]	Localized	Minor	Beneficial	Narrative on p. 112 describes both short and long term impacts.	Revise tables 11 and 17 to include both short and long term impacts
	<i>Water</i>	Direct [& indirect]	Long-term	Localized	Moderate	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse	Narrative on p. 113 describes both direct and indirect impacts.	Revise tables 11 and 17 to include both direct and indirect impacts.
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Short-term	Localized	Minor	Adverse		
		Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short-term	Beyond Project Site	Moderate	Adverse	Tables 11 and 17 list differing Geographic extent impacts to air.	Table 17 is correct per narrative on p.114. Revise Table 11.
		Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Land Use and Recreation</i>	Direct	[Short-term & Long-term]	Localized	Minor	Beneficial	Narrative on p. 112 describes both short and long term impacts.	Revise tables 11 and 17 to include both short and long term impacts
	<i>Socioeconomics</i>	Direct	Short-term & Long-term	Localized	Minor	Beneficial		

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Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Dam and Culvert Removal, Modification, or Replacement (Section 4.5.2.3.1)	<i>Geology and Soils</i>	Direct & Indirect	Short-term & Long-term	Localized Beyond Project Site	Minor & Moderate	Adverse	Narrative on p.116 indicates adverse impacts to geology and soils will be short term. It also describes the impact as reaching beyond the project site.	Revise Tables 11 and 18 to reflect that adverse impacts are limited to short-term, and that they may extend beyond the project site per the narrative on p.116.
		Direct & Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Water</i>	Direct [& indirect]	Short-term	Beyond Project Site	Minor	Adverse	Narrative on p.116-7 indicates that the impacts to water are both direct and indirect. Narrative on p.117 indicates that beneficial impacts to water may be moderate to major.	Revise Tables 11 and 18 to reflect that impacts to water are both direct and indirect Revise Tables 11 and 18 to reflect that the beneficial impacts to water are moderate to major. Overall, the narrative and tables in this section needs to be adjusted to be more clear that the adverse impacts are minor to moderate adverse - the only major impacts are beneficial ones.
		Direct [& indirect]	Long-term	Beyond Project Site	Moderate [to Major]	Beneficial		
		Direct	Short-term	Localized Beyond Project Site	Minor	Adverse		
	<i>Air</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse	Tables 11 and 18 list differing geographic extents for impacts to air	Table 18 is correct. Revise table 11 to reflect impacts beyond the project site.
	<i>Living Coastal and Marine Resources and EFH</i>	Direct & Indirect	Short-term	Beyond Project Site	Moderate	Adverse		
		Direct	Long-term	Beyond Project Site	Major	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short-term	Beyond Project Site	Moderate	Adverse	Overall, the narrative and tables in this section needs to be adjusted to be more clear when adverse impacts are minor or moderate adverse - the only major impacts are beneficial ones.	
		Direct	Long-term	Beyond Project Site	Major	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct	Long-term	Localized	Moderate and Major	Adverse	Tables 1 and 18 list differing magnitude/intensity of impacts to cultural and historic resources	Table 11 is accurate per narrative on p.119; change table 18 to Moderate and Major
		Direct	Permanent	Localized	Major	Beneficial		
<i>Land Use and Recreation</i>	Direct	Long-term	Beyond Project Site	Minor	Adverse	Narrative on p 119 combines these areas in the analysis. Tables appear consistent overall, but future revision could be done to clarify this connection.		
	Direct	Long-term	Beyond Project Site	Moderate	Beneficial			
<i>Socioeconomics</i>	Indirect	Long-term	Localized	Moderate	Beneficial			

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Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Technical and Nature-like Fishways (Section 4.5.2.3.2)	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor & Moderate	Adverse	<p>Magnitude and geographic extent of impacts are not specifically addressed in this narrative section, but handled consistent with rest of PEIS. Recommend revising narrative to restate for the sake of completeness.</p> <p>Narrative on p. 120 describes both short-term and long-term impacts to Living Coastal and Marine Resources and EFH, whereas tables 11 and 19 only list short-term</p> <p>Narrative on p.121 lists both Minor and Major beneficial impacts to Coastal and Marine resources, whereas tables 11 and 19 only include major</p> <p>Narrative on p. 120 describes both short-term and long-term impacts to Threatened and Endangered species, whereas tables 11 and 19 only list short-term</p> <p>Narrative on p.121 lists both Minor and Major beneficial impacts to Threatened & Endangered Species, whereas tables 11 and 19 only list major</p> <p>This is consistent with the previous section, but not covered in this section narrative. Recommend revising narrative</p> <p>Narrative on p.122 lists both direct and indirect, and short-term and long-term socioeconomic benefits, whereas tables 11 and 19 only list indirect and long-term</p>	
	<i>Water</i>	Direct	Short-term	Beyond Project Site	Minor & Moderate	Adverse		
	<i>Air</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct & Indirect	Short-term & Long-term	Beyond Project Site	Minor & Moderate	Adverse		
		Direct & Indirect	Long-term	Beyond Project Site	[Minor to Major]	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short-term & Long-term	Beyond Project Site	Minor & Moderate	Adverse		
		Direct & Indirect	Long-term	Beyond Project Site	[Minor to Major]	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct	Long-term	Localized	Moderate & Major	Adverse		
	<i>Land Use and Recreation</i>	Direct	Permanent	Localized	Major	Beneficial		
		Direct	Short-term & Long-term	Beyond Project Site	Minor	Adverse		
<i>Socioeconomics</i>	Direct	Long-term	Beyond Project Site	Moderate	Beneficial			
	[Direct &] Indirect	[Short-term &] Long-term	Localized	Minor	Beneficial			

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On-the-Ground Riverine and Coastal Restoration								
Invasive Species Control (Section 4.5.2.4.1)	<i>Geology and Soils</i>	Direct	Short-term	Localized	Moderate	Adverse	First summary paragraph of narrative could be revised for clarity Narrative on p. 123 describes moderate to major beneficial impacts to geology and soils, whereas tables 11 and 20 only list moderate. Narrative on p. 123 describes moderate to major beneficial impacts to water, whereas tables 11 and 20 only list moderate. Tables 11 and 20 have differing magnitude of impacts listed for air. Narrative on p. 123 describes moderate to major beneficial impacts to living coastal and marine resources and EFH, whereas tables 11 and 20 only list moderate. Narrative on p. 123 describes moderate to major beneficial impacts to Threatened and Endangered Species, whereas tables 11 and 20 only list moderate	Revise Tables 11 and 20 to include moderate to major beneficial impacts to geology and soils. Revise Tables 11 and 20 to include moderate to major beneficial impacts to water. Revise Table 11. Table 20 is accurate per the narrative on p.123. Revise Tables 11 and 20 to include moderate to major beneficial impacts to coastal and marine resources. Revise Tables 11 and 20 to include moderate to major beneficial impacts to T&E Species.
		Direct	Long-term	Localized	Moderate [to Major]	Beneficial		
	<i>Water</i>	Direct	Short-term	Beyond Project Site	Moderate	Adverse		
		Direct	Long-term	Beyond Project Site	Moderate [to Major]	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized	Minor Moderate	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Short-term	Beyond Project Site	Moderate	Adverse		
		Direct	Long-term	Beyond Project Site	Moderate [to Major]	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct	Short-term	Beyond Project Site	Moderate	Adverse		
Direct		Long-term	Beyond Project Site	Moderate [to Major]	Beneficial			
<i>Cultural and Historic Resources</i>				No Effect				
<i>Land Use and Recreation</i>	Direct	Short-term	Localized	Moderate	Adverse			
<i>Socioeconomics</i>				No Effect				
Prescribed Burns (Section 4.5.2.4.2) P.95 and P. 127	<i>Geology and Soils</i>	Direct	Short-term	Localized	Moderate	Adverse	Tables 11 and 21 have differing geographic extents for impacts to air. Revise table 11. Table 21 is correct and consistent with narrative on page 126.	
		Direct	Long-term	Localized	Moderate	Beneficial		
	<i>Water</i>	Direct & Indirect	Short-term	Localized	Moderate	Adverse		
		Direct	Short-term	Localized Beyond Project Site	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Short-term	Localized	Minor	Adverse		
		Direct & Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct	Short-term	Localized	Minor	Adverse		
		Direct & Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Land Use and Recreation</i>	Direct	Short-term	Beyond Project Site	Moderate	Adverse		
<i>Socioeconomics</i>	Direct	Short-term	Localized	Minor	Adverse			

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On-the-Ground Riverine and Coastal Restoration									
Species Enhancement (stocking) (Section 4.5.2.4.3)	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse			
	<i>Water</i>			No Effect					
	<i>Air</i>	Direct	Short-term	Localized	Minor	Adverse			
	<i>Living Coastal and Marine Resources and EFH</i>	Direct & Indirect	Short-term & Long-term	Beyond Project Site	[Minor & Moderate & Major]	Adverse	Narrative on p. 128-129 describes minor to major adverse impacts to Living coastal and marine Resources and EFH, whereas tables 11 and 22 only list moderate and major.	Revise tables 11 and 22 to list minor to major impacts to coastal and marine resources	
	<i>Threatened and Endangered Species</i>		Direct & Indirect	Short-term & Long-term	Beyond Project Site	Moderate	Beneficial		
			Direct & Indirect	Short-term & Long-term	Beyond Project Site	[Minor & Moderate & Major]	Adverse	Narrative on p. 128-129 describes minor to major adverse impacts to Threatened and Endangered Species, whereas tables 11 and 22 only include moderate and major.	Revise tables 11 and 22 to list minor to major impacts to T&E species.
			Direct & Indirect	Short-term & Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>			No Effect					
	<i>Land Use and Recreation</i>	Indirect	Long-term	Localized	Minor	Beneficial			
	<i>Socioeconomics</i>	[Direct &] Indirect	Short-term & Long-term	Localized	Minor	Beneficial	Narrative on p. 128 describes both indirect and direct beneficial impacts to socioeconomics, whereas tables 11 and 22 only list indirect.	Revise tables 11 and 22 to list both direct and indirect impacts to socioeconomics.	
Channel Restoration (Section 4.5.2.5.1) P.96 & P.132	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse			
	<i>Water</i>	Direct	Short Term	Beyond Project Site	Minor	Adverse			
		Direct	Long-term	Beyond Project Site	Moderate	Beneficial			
	<i>Air</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse	Tables 11 and 23 list differing geographic extents for impacts to air.	Revise Table 11. Table 23 is correct and consistent with narrative on p. 131.	
	<i>Living Coastal and Marine Resources and EFH</i>	Direct & Indirect	Short Term	Beyond Project Site	Minor & Moderate	Adverse			
		Direct	Long-term	Beyond Project Site	Moderate	Beneficial			
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short Term	Beyond Project Site	Minor & Moderate	Adverse			
		Direct	Long-term	Beyond Project Site	Moderate	Beneficial			
	<i>Cultural and Historic Resources</i>	[Direct &] Indirect	Short-term & Long-term	Localized	Minor	Adverse	Narrative on p.131 only describes direct adverse impacts to cultural and historic resources, whereas tables 11 and 23 list both direct and indirect	Revise tables 11 and 22 to list only direct impacts to cultural and historic resources.	
	<i>Land Use and Recreation</i>	Direct	Short Term	Beyond Project Site	Minor	Adverse			
Direct		Long-term	Beyond Project Site	Moderate	Beneficial				
<i>Socioeconomics</i>	Indirect	Short term & Long-term	Localized	Minor & Moderate	Beneficial				

APPENDIX A

This table depicts noted translation and editorial inconsistencies contained within the NOAA PEIS, presented here as a revision to Table 11 located on pages 91 - 104. **

Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Bank Restoration and Erosion Reduction (Section 4.5.2.5.2)	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse	<p>Narrative on p.133 describes both minor and moderate beneficial impacts to water, whereas tables 11 and 24 only list moderate beneficial impacts to water.</p> <p>inclusion of Moderate is supported by section 4.7 and indirectly in narrative on page 133 - Narrative in this section could be modified to explicitly state this</p> <p>Table determinations are supported by the narrative description on p. 132, however the narrative in this section could be modified to be more clear and specific.</p>	
	Water	Direct	Short Term	Beyond Project Site	Minor	Adverse		
		Indirect	Long-term	Beyond Project Site	[Minor & Moderate]	Beneficial		
	Air	Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EPH</i>	Direct & Indirect	Short Term	Beyond Project Site	Minor & Moderate	Adverse		
		Direct	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short Term	Beyond Project Site	Minor & Moderate	Adverse		
		Direct	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct & Indirect	Short-term & Long-term	Localized	Minor	Adverse		
		Direct	Short Term	Beyond Project Site	Minor	Adverse		
<i>Land Use and Recreation</i>	Direct	Long-term	Beyond Project Site	Moderate	Beneficial			
	Indirect	Short term & Long-term	Localized	Minor & Moderate	Beneficial			
Coral Reef Restoration (Section 4.5.2.6.1)	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse	<p>The narrative on p. 136 actually describes impacts as "site specific"; The table determination is still an accurate assessment when viewed in the context of the NHPA.</p>	
	Water	Direct	Long-term	Localized	Moderate & Major	Beneficial		
		Direct	Short-term	Localized	Minor	Adverse		
	Air	Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
		Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EPH</i>	Direct	Short-term	Localized	Minor	Adverse		
		Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
		<i>Cultural and Historic Resources</i>				No Effect		
	<i>Land Use and Recreation</i>	Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
Indirect		Long-term	Beyond Project Site	Moderate	Beneficial			

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Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Shellfish Reef Restoration (Section 4.5.2.6.2) <i>P.98 & P.141</i>	<i>Geology and Soils</i>	Direct & Indirect	Long-term	Beyond Project Site	Moderate	Beneficial	Tables 11 and 26 list differing geographic extents for impacts to air.	Revise Table 11. Table 26 is accurate, consistent with narrative on 139.
		Direct	Short-term	Localized	Minor	Adverse		
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
		Indirect	Long-term	Beyond Project Site	Minor	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Long-term	Beyond Project Site	Moderate & Major	Beneficial		
		Direct	Short-term	Localized	Minor	Adverse		
	<i>Threatened and Endangered Species</i>	Indirect	Long-term	Beyond Project Site	Minor	Beneficial		
	<i>Cultural and Historic Resources</i>	Indirect	Long-term	Beyond Project Site	Minor	Beneficial		
	<i>Land Use and Recreation</i>	Direct	Short-term	Beyond Project Site	Minor	Adverse & Beneficial		
<i>Socioeconomics</i>	Indirect	Long-term	Beyond Project Site	Minor	Beneficial			
Artificial Reef Restoration (Section 4.5.2.6.3)	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse	Narrative on p. 141 lists both direct and indirect, and adverse and beneficial impacts to socioeconomics.	Revise tables 11 and 27 to reflect both direct and indirect, and adverse and beneficial impacts to socioeconomics. Further clarity may be gained by breaking these into two or more lines.
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Air</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Long-term	Beyond Project Site	Moderate	Beneficial		
		Direct	Short-term	Localized	Minor	Adverse		
	<i>Threatened and Endangered Species</i>	Direct	Long-term	Beyond Project Site	Moderate	Beneficial		
		Direct	Short-term	Localized	Minor	Adverse		
	<i>Cultural and Historic Resources</i>			No effect				
	<i>Land Use and Recreation</i>	Indirect	Long-term	Beyond Project Site	Minor	Beneficial		
	<i>Socioeconomics</i>	[Direct &] Indirect	Short-term & Long-term	Beyond Project Site	Minor	[Adverse &] Beneficial		
Road Decommissioning and Upgrading (Section 4.5.2.7)	<i>Geology and Soils</i>	Direct	Short-term	Localized	Moderate	Adverse		
		Direct	Long-term	Localized	Moderate and Major	Beneficial		
	<i>Water</i>	Direct	Short-term	Beyond Project Site	Minor	Adverse		
		Indirect	Long-term	Beyond Project Site	Moderate and Major	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Indirect	Short-term	Beyond Project Site	Minor	Adverse		
		Indirect	Long-term	Beyond Project Site	Moderate and Major	Beneficial		
	<i>Threatened and Endangered Species</i>	Indirect	Short-term	Beyond Project Site	Minor	Adverse		
		Indirect	Long-term	Beyond Project Site	Moderate and Major	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct	Long-term	Localized	Moderate and Major	Beneficial		
	Indirect	Short-term	Localized	Minor	Adverse			
<i>Land Use and Recreation</i>	Direct	Long-term	Localized	Minor	Adverse & Beneficial			
<i>Socioeconomics</i>	Indirect	Long-term	Localized	Minor	Adverse & Beneficial			

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Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Trail Restoration <i>(Section 4.5.2.7)</i>	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse		
		Direct	Long-term	Localized	Moderate and Major	Beneficial		
	<i>Water</i>	Indirect	Short-term	Beyond Project Site	Minor	Adverse		
		Indirect	Long-term	Beyond Project Site	Moderate and Major	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	[Direct & Indirect]	Short-term	Beyond Project Site	Minor	Adverse	The narrative on p.143 describes both direct and indirect impacts to living coastal and marine resources and EFH, whereas tables 11 and 29 only list indirect	Revise tables 11 and 20 to include both direct and indirect benefits to Coastal and Marine resources.
		Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	[Direct & Indirect]	Short-term	Beyond Project Site	Minor	Adverse	The narrative on p.143 describes both direct and indirect impacts to Threatened and Endangered Species, whereas tables 11 and 29 only list indirect	Revise tables 11 and 20 to include both direct and indirect benefits to T&E species.
		Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct	Long-term	Localized	Minor	Beneficial		
<i>Land Use and Recreation</i>	Indirect	Short-term	Localized	Minor	Adverse			
<i>Socioeconomics</i>	Indirect	Long-term	Localized	Minor	Beneficial			
Signage and Access Management <i>(Section 4.5.2.B)</i>	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse		
		Direct	Long-term	Localized	Moderate	Beneficial		
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
		Direct	Long-term	Localized	Moderate	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short-term	Localized	Minor	Adverse		
		Direct	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>			No Effect			Impacts to cultural and historic impacts are not specifically addressed in the narrative for this section, consistent with the no effect summary in Table 11 but revisions could be made to specifically state this.	
	<i>Land Use and Recreation</i>	Direct	Long-term	Localized	Minor	Adverse [& Beneficial]	The narrative on page 145 notes a Beneficial localized land use impact through reduced disturbance by humans, animals, and vehicles, reduced spread of invasive species spread by consolidating or restricting access to sensitive habitats, whereas table 11 only lists adverse impacts.	Revise Table 11 to include beneficial land use impacts
<i>Socioeconomics</i>			No Effect			Impacts to socio-economics are not specifically addressed in the narrative for this section, consistent with the no effect summary in Table 11 but revisions could be made to specifically state this.		

APPENDIX A

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Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Submerged Aquatic Vegetation (Section 4.5.2.9.1) p.145-147 P.100 and P.147	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse	Tables 11 and 30 list differing impacts on air quality. Table 11 is correct, with a correction to "beyond project site"; Revise table 30. NOAA clarifies that these should be the same as the impacts for Water Conservation and Stream Diversion. Though not described in Section 4.5.2.9.1, the collection, transport, and planting of SAV or marine Algae may require use of motorized equipment such as boats or vehicles, and this could create direct, beyond project site, temporary, and very minor air quality impacts (adverse). These impacts are described in section 4.5.2.10 as "These impacts include exhaust emissions from off-road construction equipment, on-road hauling, construction worker employee commuting vehicles, and fugitive dust emissions from paved roads and earthmoving activities."	
		Indirect	Long-term	Localized	Minor	Beneficial		
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
		Indirect	Long-term	Localized	Minor	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Short-term	Beyond Project Site	Minor & Moderate	Adverse		
		Indirect	[Short-term & Long-term]	Beyond Project Site	Minor & Moderate	Beneficial		
		Direct	Short-term	Beyond Project Site	Minor & Moderate	Adverse		
		Indirect	[Short-term & Long-term]	Beyond Project Site	Minor & Moderate	Beneficial		
<i>Threatened and Endangered Species</i>								
<i>Cultural and Historic Resources</i>	Direct	Long term	Localized	Minor	Adverse			
<i>Land Use and Recreation</i>	Direct [& Indirect]	Long-term	Localized	Minor & Moderate	Beneficial			
<i>Socioeconomics</i>	Indirect	Long-term	Localized	Minor	Beneficial			
						Narrative on p.146 describes both short-term and long-term beneficial impacts to living coastal and marine resources and EFH, whereas tables 11 and 30 only include long-term	Correct tables 11 and 30 to include both short-term and long-term impacts to coastal and marine resources.	
						Narrative on p.146 describes both short-term and long-term beneficial impacts to Threatened and Endangered Resources, whereas tables 11 and 30 only include long-term	Revise tables 11 and 30 to include both short-term and long-term impacts to T&E species.	
						Narrative on p. 146 describes both direct and indirect impacts to land use and recreation, whereas tables 11 and 30 only list direct.	Revise tables 11 and 30 to include both direct and indirect beneficial impacts to land use and restoration.	

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Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Marine Algae Restoration (Section 4.5.2.9.2) p.147-148 P.101 and P.148	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse	Tables 11 and 30 list differing impacts on air quality. Table 11 is correct, with a correction to "beyond project site"; Need to revise table 31. NOAA clarification that these should be the same as the impacts for Water Conservation and Stream Diversion. Though not described in Section 4.5.2.9.1, the collection, transport, and planting of SAV or marine Algae may require use of motorized equipment such as boats or vehicles, and this could create direct, beyond project site, temporary, and very minor air quality impacts (adverse). These impacts are described in section 4.5.2.10 as "These impacts include exhaust emissions from off-road construction equipment, on-road hauling, construction worker employee commuting vehicles, and fugitive dust emissions from paved roads and earthmoving activities."	
		Indirect	Long-term	Localized	Minor	Beneficial		
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
		Indirect	Long-term	Localized	Minor	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Short-term	Beyond Project Site	Minor & Moderate	Adverse		
		Indirect	Long-term	Beyond Project Site	Minor & Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct	Short-term	Beyond Project Site	Minor & Moderate	Adverse		
		Indirect	Long-term	Beyond Project Site	Minor & Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>	Direct	Long term	Localized	Minor	Adverse		
<i>Land Use and Recreation</i>	Direct	Long-term	Localized	Minor & Moderate	Beneficial			
<i>Socioeconomics</i>	Indirect	Long-term	Localized	Minor	Beneficial			
Water Conservation and Stream Diversion (Section 4.5.2.10) P. 101, P.151, & P.150	<i>Geology and Soils</i>	Indirect	Long-term	Localized	Minor	Beneficial	Summary narrative could be more clear on associated impacts Tables 11 and 32 list differing geographic extents of impacts to air. Table 32 is correct per narrative on p.149; Revise table 11. Narrative on page 150 lists "no impacts" to land use and recreation, whereas tables 11 and 32 list beneficial impacts. Per conversation with NOAA, revise narrative on p. 150 to read "there are no ADVERSE long-term impacts to land use anticipated." As accurately indicated in the tables, there are long-term BENEFICIAL land use impacts.	
	<i>Water</i>	Indirect	Long-term	Beyond Project Site	Minor	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EFH</i>	Indirect	Long-term	Beyond Project Site	Minor	Beneficial		
	<i>Threatened and Endangered Species</i>	Indirect	Long-term	Beyond Project Site	Minor	Beneficial		
		Indirect	Short-term	Beyond Project Site	Minor	Adverse		
	<i>Cultural and Historic Resources</i>	Indirect	Long-term	Localized	Minor	Beneficial		
	<i>Land Use and Recreation</i>	Direct & Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Socioeconomics</i>	Indirect	Long-term	Localized	Minor	Beneficial & Adverse		

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Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Fish Screens and Pumps <i>(Section 4.5.2.10)</i>	<i>Geology and Soils</i>	No Effect					<p>The narrative on p.149 lumps this analysis in with Water Conservation and Stream Diversion. When looked at them in tandem, the two sections of table 11 are generally supported by the narrative, exceptions noted. Unclear why this is broken out by itself in Table 11, would be most consistent to keep it lumped in with table 32, as that is where it is described in the narrative.</p> <p>Table 11 listed "ne effect" to geology and soils, whereas the narrative on p. 149 include short term impacts</p> <p>Table 11 listed localized impacts to air, whereas the combined narrative on p. 149 suggested impacts beyond the project site</p>	<p>Revise table 11 to better reflect the narrative on p. 149.</p> <p>Revise table 11 to show air impacts beyond the project site.</p>
		Indirect	Short-term	Localized	Minor	[Adverse & Beneficial]		
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Air</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EPH</i>	Indirect	Short-term	Beyond Project Site	Minor	Adverse		
		Direct	Long-term	Beyond Project Site	Major	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short-term	Beyond Project Site	Minor	Adverse		
		Direct	Long-term	Beyond Project Site	Major	Beneficial		
<i>Cultural and Historic Resources</i>	No Effect							
<i>Land Use and Recreation</i>	No Effect							
<i>Socioeconomics</i>	No Effect							
Levee and Culvert Removal, Modification, and Set-Back <i>(Section 4.5.2.11.1)</i> <i>P.102 & P.153</i>	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse [Beneficial]	<p>The narrative on p.152 describes both adverse and beneficial impacts to geology and soils, whereas tables 11 and 33 list only adverse</p> <p>Tables 11 and 33 list differing geographic extents for impacts to air.</p>	<p>Revise tables 11 and 33 to include both adverse and beneficial impacts</p> <p>Table 11 is correct per narrative on p. 153. Revise table 33.</p>
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
		Direct	Long-term	Beyond Project Site	Major	Beneficial		
	<i>Air</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Living Coastal and Marine Resources and EPH</i>	Direct & Indirect	Short-term	Beyond Project Site	Moderate	Adverse		
		Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct & Indirect	Short-term	Beyond Project Site	Moderate	Adverse		
		Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>	Indirect	Long-term	Localized	Minor	Adverse		
	<i>Land Use and Recreation</i>	Indirect	Long-term	Localized	Minor	Adverse		
<i>Socioeconomics</i>	No Effect							

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Restoration Activity	Resource	Type of Impact	Duration of Impact	Geographic Extent	Magnitude / Intensity	Quality	DESCRIPTION OF INCONSISTANCY	RECOMMENDATIONS TO NOAA
On-the-Ground Riverine and Coastal Restoration								
Wetland Restoration and Shoreline Stabilization (Section 4.5.2.11.2) <i>P.103 & P.155</i>	<i>Geology and Soils</i>	Direct [& Indirect]	Short-term [& Long-term]	Localized	Minor, [& Moderate to Major]	Adverse [& Beneficial]	Narrative on p.154 describes a wider range of impacts than reflected in tables 11 and 34.	Revise tables 11 and 34 to include full range of impacts. Recommend splitting into two or more lines to improve clarity.
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Air</i>	Indirect	Long-term	Beyond Project Site	Moderate	Beneficial	Tables 11 and 34 list differing geographic extents for impacts to air.	Table 34 is correct per narrative on p. 153. Revise Table 11.
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Short-term	Localized-Beyond Project Site	Minor	Adverse		
	<i>Threatened and Endangered Species</i>	Indirect	Short-term	Beyond Project Site	Minor & Moderate	Adverse	Tables 11 and 34 list durations for impacts to land use and recreation.	Table 34 is accurate per narrative on page 154. Revise Table 11.
		Direct	Short-term & Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>	Indirect	Long-term	Localized	Minor	Adverse		
	<i>Land Use and Recreation</i>	Indirect	Short-term	Beyond Project Site	Minor	Beneficial		
		Indirect	Short-term-Permanent	Localized	Minor	Adverse		
	<i>Socioeconomics</i>	Indirect	Long-term	Localized	Minor	Adverse		
	<i>Socioeconomics</i>	Indirect	Short-term	Beyond Project Site	Minor	Beneficial		
Wetland Planting (Section 4.5.2.11.3) <i>P.103 & P.156</i>	<i>Geology and Soils</i>	Direct	Short-term	Localized	Minor	Adverse	Table 11 is correct, with a correction to "beyond project site". Revise table 35; Per conversations with NOAA, revise narrative; NOAA clarification that these should be the same as the impacts for Water Conservation and Stream Diversion. Though not described in Section 4.5.2.9.1, the collection, transport, and planting of SAV or marine Algae may require use of motorized equipment such as boats or vehicles, and this could create direct, beyond project site, temporary, and very minor air quality impacts (adverse). These impacts are described in section 4.5.2.10 as "These impacts include exhaust emissions from off-road construction equipment, on-road hauling, construction worker employee commuting vehicles, and fugitive dust emissions from paved roads and earthmoving activities."	
	<i>Water</i>	Direct	Short-term	Localized	Minor	Adverse		
	<i>Air</i>	Indirect	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Living Coastal and Marine Resources and EFH</i>	Direct	Short-term	Localized Beyond Project Site	Minor	Adverse		
		Direct	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Threatened and Endangered Species</i>	Direct	Short-term	Localized	Minor	Adverse		
		Direct	Long-term	Beyond Project Site	Moderate	Beneficial		
	<i>Cultural and Historic Resources</i>	Indirect	Long-term	Localized	Minor	Adverse		
	<i>Land Use and Recreation</i>	Direct	Short-term	Localized	Minor	Adverse		
		Indirect	Permanent	Beyond Project Site	Minor	Beneficial		
<i>Socioeconomics</i>	Indirect	Short-term	Beyond Project Site	Minor	Beneficial			

** Please note that the service is only adopting the On-the-Ground Riverine and Coastal Restoration aspects of this PEIS. Inconsistencies noted outside the Service's scope of use have been provided to NOAA Fisheries for their consideration.

USFWS/NOAA RC NEPA Inclusion Analysis

Award Number

I. IDENTIFYING PROJECT INFORMATION

Project Name		Project State
Project Proponent / Applicant		Project Contact

II. OTHER FEDERAL PARTNERS AND LEVEL OF NEPA ANALYSIS

Has another Federal agency completed NEPA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is USFWS the lead federal agency for this NEPA analysis?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

III. PROJECT DESCRIPTION / SCOPE OF ACTIVITIES FOR ANALYSIS

Please check one of the following conditions:

I am analyzing impacts of project planning and design activities, in order to gather all required project information

I have all information needed to complete the final analysis of impacts for the entire project

Has a NEPA review been conducted for prior project activities?	<input type="checkbox"/> Yes	Date of NEPA completion for prior phase
	<input type="checkbox"/> No	

Describe the full scope of the project, including historic/ geographic/ ecological context, the type of restoration, and how it will be conducted.

Describe the proposed action (i.e. the portion of the project that USFWS is funding/approving).

Check the types of activities being conducted in this project:

Technical Assistance		
<input type="checkbox"/> Implementation and Effectiveness Monitoring	<input type="checkbox"/> Environmental Education Classes, Programs, Centers, Partnerships and Materials; Training Programs	<input type="checkbox"/> Fish and Wildlife Monitoring
<input type="checkbox"/> Planning, Feasibility Studies, Design Engineering, and Permitting		

Riverine and Coastal Habitat Restoration		
<input type="checkbox"/> Beach and Dune Restoration	<input type="checkbox"/> Bank Restoration and Erosion Reduction	<input type="checkbox"/> Water Conservation and Stream Diversion
<input type="checkbox"/> Debris Removal	<input type="checkbox"/> Coral Reef Restoration	<input type="checkbox"/> Levee & Culvert Removal, Modification, Set-back
<input type="checkbox"/> Dam and Culvert Removal & Replacement	<input type="checkbox"/> Shellfish Reef Restoration	<input type="checkbox"/> Fringing Marsh and Shoreline Stabilization
<input type="checkbox"/> Technical and Nature-like Fishways	<input type="checkbox"/> Artificial Reef Restoration	<input type="checkbox"/> Sediment Removal
<input type="checkbox"/> Invasive Species Control	<input type="checkbox"/> Road Upgrading/Decommissioning; Trail Restoration	<input type="checkbox"/> Sediment/Materials Placement
<input type="checkbox"/> Prescribed Burns/Forest Management	<input type="checkbox"/> Signage and Access Management	<input type="checkbox"/> Wetland Planting
<input type="checkbox"/> Species Enhancement	<input type="checkbox"/> SAV Restoration	
<input type="checkbox"/> Channel Restoration	<input type="checkbox"/> Marine Algae Restoration	

Conservation Transactions		
<input type="checkbox"/> Land Acquisition	<input type="checkbox"/> Water Transactions	<input type="checkbox"/> Restoration/Conservation Banking

NEPA Inclusion Analysis

IV. PROJECT IMPACT ANALYSIS

Core Questions

1. Are the activities to be carried out under this project fully described in Section 2.2 of the NOAA RC PEIS?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Are the specific impacts that are likely to result from this project fully described in Section 4.5.2 of the NOAA RC PEIS?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3. Does the level of adverse impact for the project exceed that described in the NOAA RC PEIS for any resource, including significant adverse impact?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4. Describe the project impacts to resources (including beneficial impacts) and any mitigating measures being implemented.		
5. Describe any potential cumulative impacts that may result from past, present or reasonably foreseeable future actions (beneficial or adverse).		
6. Describe the public outreach and/or opportunities for public comment that have taken place to this point. Are any future opportunities for public input anticipated?		
7. Have any public comments raised issues of scientific/environmental controversy? Please describe.		
8. Describe the most common positive and negative public comments on issues other than scientific controversy described above in Question 7.		

V. NEPA DETERMINATION

The action is completely covered by the impact analysis within the NOAA RC Programmatic EIS (PEIS). The project and its potential impacts may be limited through terms or conditions placed on the recipient of USFWS funds. It requires no further environmental review. An EIS Inclusion Document will be prepared.

The action analyzed here has unknown impacts. At this time, funding will be limited to those portions of the action and impacts analyzed in the PEIS. These limitations will be described in terms or conditions placed on the recipient of USFWS funds. If all remaining activities and impacts are later determined to be described in the PEIS, this analysis will be documented in the program record and the applicant may then proceed with the project. If all remaining activities and impacts are later determined to not be described in the PEIS, further NEPA review will be required; see below.

The action or its impacts are not covered by the analysis within the PEIS. It will require preparation of an individual EA, a supplemental EIS, adoption of another agency's EA or EIS, or will be covered by a Categorical Exclusion.

Signature _____

Date Signed _____