

# PROGRAMMATIC ENVIRONMENTAL COMPLIANCE CONSIDERATIONS FOR DREDGING AND PLACEMENT ACTIVITIES

**PACIFIC CHAPTER WEDA FALL 2018 CONFERENCE**

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# INTRODUCTION

- Programmatic Environmental Compliance (Focus on NEPA)
- Potential Applications
- Example Projects
- Benefits
- Challenges
- Conclusion



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# WHAT IS PROGRAMMATIC ENVIRONMENTAL COMPLIANCE?

- The Center for Environmental Quality (CEQ) defines “programmatic” as documentation that describes any broad or high level NEPA review.
- Programmatic NEPA reviews may cover programs, policies or projects for which subsequent actions will be implemented.
- Provides a holistic assessment of potentially broad ranges of effects and can often be tiered off of for subsequent project NEPA review.
- Not limited to NEPA coverage. Also used for Endangered Species Act and water quality compliance.



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# POTENTIAL APPLICATIONS OF PROGRAMMATIC COMPLIANCE

Projects with long-term, routine actions, and relatively predictable environmental effects.



USACE 2017



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# POTENTIAL APPLICATIONS OF PROGRAMMATIC COMPLIANCE

Large scale dredging projects with multiple dredging areas and placements sites i.e., Columbia River 20-year Channel Maintenance Plan (in progress).



# POTENTIAL APPLICATIONS OF PROGRAMMATIC COMPLIANCE

Beneficial use projects with large suites of potential habitat restoration areas to be implemented one at a time.



USACE 2017



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# POTENTIAL APPLICATIONS FOR DREDGING AND PLACEMENT ACTIVITIES

Channel maintenance structure replacements and rehab i.e., Columbia River pile dike repairs.



USACE 1998



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# CHALLENGES OF PROGRAMMATIC COMPLIANCE

- Funding for a large programmatic effort may not be obtainable in a program that typically funds site specific work on a project-by-project basis.
- The level of detail that is needed to predict future environmental effects can be variable and may require analyzing ranges of effects versus site specific effects to a fine scale.
- Varying levels of details included in the programmatic analysis may require subsequent supplemental NEPA documentation as a tiered analysis.



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# BENEFITS OF PROGRAMMATIC COMPLIANCE

- Broader consideration of environmental effects ensures that cumulative effects are considered adequately and may reveal more effective/appropriate mitigation measures.
- Streamlining future compliance efforts through the existence of a high level review instrument that may be assessed for adequacy for application to subsequent actions or may be supplemented/tiered.



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# CONCLUSION

- Programmatic compliance documentation can cover a broad range of activities and effects over long periods of time. Not limited to NEPA.
- Several applications for programmatic compliance for dredging and placement actions.
- Challenges and benefits exist for use of programmatic compliance. Long-term benefits and efficiencies are likely to outweigh the up front challenges.



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