

SUBJECT: Eugene-Springfield Metropolitan Waterways Study Integrated Feasibility Report and Environmental Assessment

1. The environmental assessment portion of the integrated report is incomplete due to the project's history of sporadic funding. An opportunity exists now to complete the report and feasibility phase, using the precedent set by the Illinois River Basin Restoration Comprehensive Plan with Integrated Environmental Assessment (EA) and its signed FONSI. The Illinois Comp report includes a Programmatic Environmental Assessment rather than a traditional project environmental assessment.
2. The level of detail of a Programmatic EA is more appropriate for the Metro Waterways study purpose than a traditional EA. Like the Illinois Comp report, the rationale behind the Metro Waterways study is to create a comprehensive plan for restoration on a watershed level. The programmatic EA and FONSI would be for the overall restoration program and not necessarily have enough detail for individual projects to move into construction. During preconstruction engineering and design (PED), an EA would then be prepared for individual projects as the projects further formulated, ultimately leading to plans and specifications.
3. According to section 2-6(c) of AR 200-2, "Army agencies are encouraged to write programmatic environmental analyses when such programs are being considered for general application (40 CFR 1502.4 (c), 1502.20 and 1508.23). This will eliminate repetitive discussions of the same issues and focus on the key issues at each appropriate level of project review. When a broad EIS or EA has been prepared and a subsequent EIS or EA is then prepared on an action included within the entire program or policy (particularly a site-specific action), it need only summarize issues discussed in the broader statement and concentrate on the issues specific to the subsequent action. This subsequent document will state where the earlier document is available."
4. The District recommends completing the environmental assessment programmatically given that: (1) in all likelihood given the past funding history a traditional EA done during the feasibility phase would have to be updated during PED; and (2) there is recent USACE precedent for this kind of study, the Programmatic EA is recommended by army regulations, and it is suitable for the purpose of completing the feasibility phase of the Metro Waterways integrated study.
5. The District requests NWD concurrence and a memo of support for this environmental compliance strategy—per the wishes of the project sponsors, the cities of Eugene and Springfield.