

# NEPA Pilot Project Update

BRS Stakeholder Meeting  
December 5, 2012  
Rebecca Stankiewicz Gabel, Ph.D.

# NEPA Pilot Project



- Two year voluntary project
  - April 2011- April 2013
- Addresses NEPA analyses for petitions for non-regulated status
- Analyzes different methods to produce effective NEPA analyses
- Evaluates quality, time, cost



# Pilot Project Workshops



- July 14, 2011
  - Environmental Reports (ERs)
  - Cooperative Agreements (CAs)
  
- September 25, 2012
  - NEPA in the new petition process
  - ER evaluation tools
  - Early trends from the pilot

# Environmental Reports



- Can be submitted up to initiation of NEPA analysis for a petition
- Should be separate from petition
- Are not published in Federal Register with petition during initial 60-day comment (scoping) period



# Environmental Report Guidance



- Provide guidance to petitioners wishing to prepare ERs
  - Use feedback from participants to refine guidance throughout the pilot program

[http://www.aphis.usda.gov/biotechnology/nepa\\_pilot\\_documents.shtml](http://www.aphis.usda.gov/biotechnology/nepa_pilot_documents.shtml)

- APHIS is evaluating ERs and documenting ways they contribute to final NEPA analysis

# Environmental Report Rubric Example

Criteria	2 (Meets criteria)	1 (Minimally addresses criteria)	0 (Does not address criteria)	Comments
<b>Purpose and Need</b>	Describes GE organism; explains why needed; IDs how organisms will be used in environment	Not enough info to understand issues or concerns driving need for the organism	This section not developed	2
<b>Action</b>	Action clearly stated	Action vague—what does petitioner seek from APHIS?	Action not stated	2
<b>Range</b>	Geographic area of action clearly identified; focus is on species of GE crop; entire range including other countries, is addressed.	Discussion missing regarding areas GE crop can be grown or location of non-GE crops	Action area not outlined or additional considerations needed. On what types of land is crop grown? Does GE trait expand the cultivation area?	1 – Proportion of crop that is GE reported on national level, only. State-level adoption would be useful.



# Environmental Report Review



- Based on review of four submitted ERs, areas for improvement were identified and presented during Sept. 25 workshop



# Preliminary Measures



- APHIS resources needed:
  - To manage & review contractor-prepared analyses
  - For contracted analyses vs. in-house
  - With and without petitioner prepared ERs
- Using baseline of four contractor-prepared EAs vs. four prepared by APHIS over six months

# NEPA Pilot Project Trends



- Petitions with ERs completed with fewer staff hours than those without ER
  - Trend is expected to continue as proficiency and familiarity increase
    - Petitioners know what to expect
    - APHIS-BRS standardizes processes
- Contractor prepared EAs did not reduce APHIS staff hours for four EAs thus far

# Activities Through Pilot Completion



- Continue evaluating submitted ERs
- Provide feedback to project participants
- Continue to evaluate in-house and contractor EA preparation process
  - Consider all variables in this process
- Petitions still in NEPA Pilot Project at project conclusion will continue to be evaluated until petition completes petition process



# Ultimate Goal



- Build a robust and efficient petition review process
- Input from Pilot Project participants is welcome at any point in time