

Environmental and Cultural Reviews

All proposed actions funded by the SRF Program must undergo an environmental and cultural resource review to assess compliance with the intent of the National Environmental Policy Act (NEPA), the State Environmental Review Process (SERP), and the National Historic Preservation Act (NHPA). The purpose of the review is to evaluate a project’s potential impact on natural and cultural resources. Loans solely for planning and design may not require an environmental review prior to receiving a loan agreement.

No pre-construction ground disturbing or construction activities shall begin before the environmental review is completed, including any public notice or review periods. This includes drilling test wells, geo-technical testing, grading, clearing, etc. If ground-disturbing activities occur before the final completion of the environmental review process, SRF loan funding may be jeopardized.

To initiate the environmental review process, an Environmental Review Checklist must be submitted to the SRF Program for review. The Checklist must include detailed information about the scope of work and a map showing the location of all planned work activities. The Environmental Impact Analyst will review the information and determine which of the three levels of review is required. These levels are described below.

Categorical Exclusion (CE)	If the project meets the conditions for a CE, the DEC Environmental Impact Analyst will document this decision by posting a public notice and issuing a letter to the borrower. Projects that receive a CE are allowed to continue with no further environmental review. The borrower must wait to begin ground disturbing activities until DEC has provided documentation of the CE public notice.
Environmental Assessment Finding of No Significant Impact (EA/FONSI)	If a project is not eligible for a CE, the applicant must prepare an Environmental Information Document to assess all impacts of the proposed project and determine if there are any significant impacts. The applicant must hold a public hearing to present the findings of the Environmental Information Document. Based on the information provided, the DEC Environmental Impact Analyst will prepare an Environmental Assessment (EA) and determine if a Finding of No Significant Impact (FONSI) is appropriate. If applicable, DEC will publish a FONSI followed by a 30-day public comment period. If no significant comments are received, the environmental review will be finalized.
Environmental Impact Statement Record of Decision (EIS/ROD)	Projects not eligible for either a CE or an EA must complete an Environmental Impact Statement and obtain a Record of Decision. The specifics and scope for this effort will be determined on a project by project basis and will be coordinated by DEC.

ADOPTION OF A FEDERAL DETERMINATION

If the proposed project has previously received a CE or FONSI from a federal agency, the federal determination may be adopted. **The previous determination must cover all portions of the project funded through the SRF, and it must cover all required federal cross cutters.**

PREVIOUS ENVIRONMENTAL REVIEWS

If a project was approved more than five years prior, the environmental review must be re-affirmed by the Environmental Impact Analyst.

SCOPE OF WORK CHANGES

Changes to the scope of work may result in the need for additional environmental and/or cultural resource review, especially if the change involves increasing or changing the project location, excavating at a deeper depth or in a different location, or adding new elements to the project scope of work. ***No work related to a change in scope of work is authorized before the SRF project engineer determines whether the change is eligible, all elements of the environmental and/or cultural review are completed for the proposed change, and a loan agreement amendment is fully executed.***

ENVIRONMENTAL REVIEW CHECKLIST

An Environmental Review Checklist is available on the SRF Program website. Submittal of this form to the Environmental Impact Analyst initiates the environmental review process and serves as a request for a Categorical Exclusion. The Environmental Impact Analyst will review the submitted project information and notify the applicant of the type of environmental documentation required, if any.

The applicant is encouraged to provide as much information as possible in the Environmental Review Checklist in order to expedite the review process.

Historic Properties: Cultural Resource Review

- The applicant will be required to obtain concurrence from the State Historic Preservation Officer (SHPO). This requires sending a letter to the SHPO to provide a description of the project and request concurrence with the finding of effect.
- If assistance is requested, the DEC Environmental Impact Analyst will review the project description and location maps to make a determination regarding impacts to cultural resources.
- The applicant can request a template letter for submittal to SHPO from the DEC Environmental Analyst.
- Presence of a National Historic Landmark will require additional consultation through the National Park Service (NPS).
- If impacts to historic sites are unavoidable, the project may not qualify for a CE.

Wetlands

- The U.S. Fish and Wildlife Service [Wetlands Mapper](#) website allows you to check an area for wetlands. Not all locations will have current wetland mapping. Contact the DEC Environmental Impact Analyst if you have questions.
- If wetlands are present, a Clean Water Act Section 404 permit may be required from the U.S. Army Corps of Engineers. Many projects will qualify for a Nationwide Permit (NWP), a general permit that authorizes activities that have minimal adverse environmental effects. The loan applicant is responsible for obtaining any needed permits.

Floodplains

- Floodplain information may be obtained from the [FEMA Flood Map Service Center](#). Some locations may not have FEMA mapping. Floodplain information may be available through the local community or through the [Community Profile Maps](#) prepared by the Alaska Department of Commerce, Community and Economic Development, Division of Community and Regional Affairs.
- If floodplains are present, a floodplain permit may be required. The applicant is required to obtain needed permits.

Contaminated Sites

- The presence of contaminated sites within the project area may require coordination with Alaska Department of Environmental Conservation Spill Prevention and Response. The online [Contaminated Sites Search](#) function allows you to check the project area for the presence of contaminated sites.

FEDERAL ENVIRONMENTAL CROSS-CUTTERS

Cross-cutting federal authorities are requirements of federal laws and executive orders that apply in federal financial assistance programs. They're called cross-cutters because they cut across programs due to the federal funding source. Because the Alaska SRF Program is capitalized by federal grants, federal cross-cutters apply to wastewater and drinking water infrastructure projects. A list of the possible applicable cross-cutters follows.

FEDERAL CROSS-CUTTING AUTHORITIES	
National Historic Preservation Act	Archeological and Historic Preservation Act
Archeological Resources Protection Act	Protection & Enhancement of the Cultural Environment (EO11593)
Native American Graves Protection and Repatriation Act	Consultation/Coordination w/Indian Tribal Governments (EO 13175)
Endangered Species Act	Fish and Wildlife Coordination Act
Marine Mammal Protection Act	Magnuson-Stevens Act – Essential Fish Habitat
Migratory Bird Act	Bald and Golden Eagle Protection Act
Clean Water Act	Protection of Wetlands (EO 11990, 12608)
Floodplain Management (EO 11988, 12148)	Rivers and Harbors Act
Wild and Scenic Rivers Act	Coastal Zone Management Act
Coastal Barrier Resources Act	Farmland Protection Policy Act
Clean Air Act	Environmental Justice (EO 12898)
Safe Drinking Water Act	

QUESTIONS?

Please contact the SRF Program Environmental Impact Analyst if you have questions about the environmental and cultural review for an SRF project.

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