



DEPARTMENT OF THE ARMY  
JACKSONVILLE DISTRICT CORPS OF ENGINEERS  
10117 PRINCESS PALM AVENUE, SUITE 120  
TAMPA, FLORIDA 33610

August 8, 2013

REPLY TO  
ATTENTION OF

Tampa Permits Section  
SAJ-2011-00551 (IP-TEH)

Ms. Georgianne Ratliff  
Ratliff Consulting Group, LLC  
11300 Suncreek Place  
Tampa, Florida 33617

Mr. John Post, Jr.  
Florida Department of Transportation  
Florida's Turnpike Enterprise  
Post Office Box 613069  
Ocoee, Florida 34761

Dear Ms. Ratliff and Mr. Post:

This is in reference to your permit application requesting authorization from the U.S. Army Corps of Engineers (Corps) to impact waters of the United States in association with a project known as "Ridge Road Extension" (SAJ-2011-00551 (IP-TEH)). At your request, a meeting was held on June 24, 2013 between Pasco County, the Corps, and Congressman Gus Bilirakis. The purpose of this letter is to address the concerns you raised during the meeting as well as those presented in your July 26, 2013 correspondence.

**Project Purpose**

According to Corps Regulations, 33 C.F.R. §325 Appendix B, Paragraph 9.b.(4), the Corps must independently define the overall project purpose for both National Environmental Policy Act (NEPA) and Clean Water Act (CWA) with input from the applicant, the public, and other Federal Agencies. The Corps defined the project purpose in accordance with our regulations and with input from Pasco County. On September 29, 2011, the Corps attached a draft public notice and associated public notice drawings to an email to Pasco County with the subject line "RRE – draft public notice verification of factual accuracy" in which the Corps stated:

Please find attached a draft of the public notice we plan to publish for this project. I have also attached the set of drawings/maps that will accompany the public notice. It is important to present concise and accurate information in the public notice. Please verify the factual accuracy of the information featured in this draft by no later than October 7, 2011.

In the draft public notice attached to the September 29, 2011 email, the overall project purpose was stated as follows:

To improve east-west roadway capacity between US-19 and US-41 and enhance overall mobility in both west and central Pasco County in accordance with the County's current Comprehensive Plan and the Metropolitan Planning Organization's Long Range Transportation Plan. The project will also provide additional roadway capacity and improved routing away from coastal hazard areas and improve hurricane evacuation clearance times in the event of a hurricane or other major weather-related occurrence in accordance with State of Florida requirements and the County's current Comprehensive Plan.

The alternatives analysis featured in an attachment to the September 29, 2011 email listed alternatives that included SR-52, SR-54 and Tower Road (see Figure 1, below). Pasco County did not revise the public notice or the alternatives analysis and the public notice was subsequently issued with the above project purpose<sup>1</sup> and the depiction of the alternatives analysis in Figure 1. During the public comment period Pasco County, the public, and other Federal Agencies did not propose to revise the project purpose to a centrally-located arterial roadway.

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<sup>1</sup> The project purpose was narrowed by the Corps to ensure that the alternatives analysis was comparing alternatives within a similar east-west boundary as the preferred alignment as follows:

To improve east-west roadway capacity and enhance overall mobility within the area bounded by SR-52 to the north, SR-54 to the south, US-41 to the east, and Moon Lake Road / DeCubellis Road / Starkey Boulevard to the west in accordance with the County's current Comprehensive Plan and the Metropolitan Planning Organization's Long Range Transportation Plan. The project will also provide additional roadway capacity and improved routing away from coastal hazard areas and improve hurricane evacuation clearance times in the event of a hurricane or other major weather-related occurrence in accordance with State of Florida requirements and the County's current Comprehensive Plan.

**Figure 1**



When the Corps received your December 17, 2012 correspondence regarding revising the overall project purpose to specify the construction of a “centrally located arterial roadway,” the Corps analyzed its regulations, case law, and applicable statutes and determined that the effect of narrowing the overall project purpose in this way would be to preclude any analysis of offsite alternatives that could be less environmentally damaging practicable alternatives. The Corps determined that this would be contrary to its regulations, the NEPA, and the CWA and informed you that the Corps could not limit the project purpose as requested. Your counsel reiterated your request to narrow the project purpose in a January 4, 2013 letter, and, for the reasons discussed above and in subsequent correspondence with you, the Corps determined that narrowing the project purpose as you requested would not be consistent with our regulations, the NEPA, and the CWA.<sup>2</sup>

<sup>2</sup> During the June 24, 2013 meeting with you and Congressman Bilirakis you again requested that the Corps narrow the project purpose. In support of this revision, you note that the proposed Ridge Road Extension is featured in Pasco County’s Long Range Transportation Plan (LRTP). While the Corps recognizes the role of the LRTP in the County’s planning process, the mere existence of the proposed Ridge Road Extension in the plan does not eliminate the possibility of reasonable alternatives worthy of further evaluation. Many of the project alternatives you have been asked to evaluate are featured, in some form or fashion, in the LRTP.

You further offer that the Institute of Traffic Engineers recommends that arterial roadways be spaced a minimum of every one mile in rural areas and note that SR-52 and SR-54 are 10 miles apart. This recommendation of the Institute of Traffic Engineers does not eliminate the need to evaluate alternatives that may not be centrally located, but that may improve east-west roadway capacity, enhance overall mobility, and improve hurricane evacuation clearance times. Pasco County also notes that the extension of Ridge Road was contemplated during the evaluation

### Practicable Alternatives

In correspondence dated April 24, 2013, the Corps provided a detailed analysis of the information provided in your April 15, 2013 submittal. Your April 15<sup>th</sup> submittal proposed the elimination of various alternatives based on their impracticability due to cost, residential/business impacts, and/or obstacle to construction. The Corps has reconsidered this information, as follows, in light of the discussions at our recent meeting.

You proposed the elimination of alternatives from further analysis that exceed 125% of the cost of the proposed project, resulting in the elimination of 12 alternatives based on this factor alone.<sup>3</sup> This threshold is based on the contingency cost allowance of 25% employed by the FDOT. The Corps believes that elimination of alternatives that are featured in whole or part on the Cost Affordable Long Range Transportation Plan (LRTP) is inappropriate. The vast majority of project alternatives are featured in whole or part on the Cost Affordable LRTP. The Guidelines require an analysis of all alternatives which are reasonable in terms of the overall scope and cost of the proposed project. Your calculations indicate that construction of elevated lanes on SR-52 and SR-54 would be very costly (\$746 million and \$1.3 billion, respectively) in comparison to the \$65 million cost of the proposed project. The Corps finds the cost of elevating SR-52 and SR-54 to be unreasonable in terms of the overall scope and cost of the proposed project and therefore determined that those alternatives (Alternatives 3 and 15) are not practicable and may be eliminated from further evaluation.

You proposed the elimination of alternatives from further analysis that exceed the average amount of residential and business impacts for the identified project alternatives, resulting in the elimination of 10 alternatives. Given alternatives of roughly 8 miles in length,

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of the Suncoast Parkway (SAJ-1996-4305) project and offers this as support for revision of the project purpose. Although Ridge Road was contemplated during the evaluation of the Suncoast Parkway, the Suncoast Parkway permit was limited to permitting of the Suncoast Parkway. The Suncoast Parkway permit does not obviate the need to fully evaluate the Ridge Road permit under the CWA, NEPA, or Corps regulations, or serve to narrow the project purpose in such a way as to preclude the review of off-site alternatives.

<sup>3</sup> The Corps also notes that you propose to eliminate alternatives as impracticable based solely on construction costs. As there are many other project factors that affect cost (right-of-way acquisition, design, compensatory mitigation, etc.), the Corps finds it inappropriate to consider further elimination of alternatives based solely on construction costs. Also, further comparison of alternatives based on cost must not include those that are not the responsibility of Pasco County (e.g., costs that are the responsibility of a developer per a development order/agreement resulting from a Development of Regional Impact or Master Planned Unit Development). For example, costs associated with Bexley Ranch, Starkey Ranch, and the Legacy development that are the responsibility of the developer, which include construction costs and/or providing right-of-way for large portions of Tower Road and SR-54, should not be considered in Pasco County's cost of development. Additionally, the Metropolitan Planning Organization's 2012 List of Priority Projects states that advanced right-of-way purchases will be made in 2015-2016 for the portion of SR-52 east of the Suncoast Parkway for widening from 2 to 6 lanes and features interchange improvements related to the project alternatives and their costs. To the extent that these costs are not incurred by Pasco County, they should not factor into Pasco County's cost analysis.

the “average” alternative requires only 2.5 residential/business impacts per mile. The Corps finds the elimination of alternatives from further analysis based on the average amount of residential and business impacts for the identified project alternatives to be arbitrary in nature. You have not explained why exceeding such a threshold renders an alternative impracticable. Also, the range of impacts to residences and businesses (i.e., 0-43, excluding Alternative 6B) is modest for alternatives of this length in a rapidly developing county.<sup>4</sup> Additionally, you have determined that the residential/business impacts associated with Alternatives 9-14 of your April 15, 2013 submittal renders these alternatives impracticable, but these alternatives are featured in whole or in part on the LRTP, which appears to be inconsistent with your determination. Therefore, the Corps maintains that it is inappropriate to exclude alternatives as impracticable based on this information.<sup>5</sup> The Corps has reconsidered the proposed impacts Alternative 6B. This alternative would impact 144 residences, which far exceeds the impacts of any other alternative. The high number of impacts is due to the fact that Alternative 6B would traverse through an existing subdivision south of the proposed alignment near the western terminus. The Corps finds the high number of impacts associated with Alternative 6B unreasonable in terms of logistics with respect to the overall scope of the proposed project and therefore determined that Alternative 6B is not practicable and may be eliminated from further evaluation.

You proposed the elimination of alternatives from further analysis that require major modifications to interchanges or bridges. Specifically, you state that SR-52 and SR-54 cannot be widened past the 6 lanes given the constraints of the Suncoast Parkway. The Corps finds that use of transitional zones outside the constraints of the Suncoast Parkway renders such alternatives practicable. Underpasses of the Suncoast Parkway could also be modified to accommodate additional lanes or the Suncoast Parkway could be bridged.<sup>6</sup> You have not demonstrated that these possibilities are impracticable. Therefore, the Corps finds that elimination of the Alternatives 2 and 14 from further analysis is inappropriate.

You proposed the elimination of alternatives from further analysis that involve the construction of Tower Road based on easement issues associated with a Tampa Bay Water (TBW) utility line. You based this in part on TBW’s guidance that its utility line cannot extend more than 500 feet under or run parallel to pavement or concrete. Per Pasco County’s provided cross-sections, the right-of-way for a 4-lane Tower Road is 136.5 feet; therefore, perpendicular

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<sup>4</sup> For the same reason, the Corps does not consider construction of a 4-lane Tower Road east of the CSX rail line, which will impact 20 residential properties, to be impracticable.

<sup>5</sup> This information may be used to compare alternatives in the full alternatives analysis.

<sup>6</sup> The Pasco County Metropolitan Planning Organization 2035 Long Range Transportation Plan anticipates including a new bridge over the Suncoast Parkway in the development of Tower Road. The Corps has determined that this demonstrates the practicability of constructing a bridge over the Suncoast Parkway for Tower Road and potentially for other alternatives.

crossings of the TBW utility line are practicable.<sup>7</sup> Additionally, many planning documents exist that call for the construction of Tower Road.<sup>8</sup> Given this information, the Corps determined that alternatives involving Tower Road cannot be eliminated from further analysis.

In summary, the alternatives that must be fully evaluated include: 1) the no-action alternative;<sup>9</sup> 2) the Ridge Road Extension alignments (6D-6G); 3) improvements to (or construction of) SR-52, SR-54, Tower Road, and Ridge Road Extension that combine to provide 4 additional/new lanes;<sup>10</sup> and 4) a fully elevated Ridge Road Extension through the Serenova Tract.

The Corps is committed to providing any assistance you may need as you prepare the alternatives analysis and other outstanding information. You may find the attached guidance document helpful in preparing the alternatives analysis. As the practicable alternatives have already been identified for this project, you may proceed with Step 5 (“Compare alternatives to identify which is the least Environmentally Damaging Alternative”). After the alternatives analysis is provided and the Corps identifies the Least Environmentally Damaging Practicable Alternative (LEDPA), the proposed compensatory mitigation will be evaluated in detail in accordance with our regulations at 33 CFR Part 332. A favorable permit decision will be rendered only if the proposed project represents the LEDPA, is not contrary to the public interest, and meets all other applicable laws and regulations.

A full response to the Corps’ July 23, 2012 Request for Additional Information letter must be provided to the Corps no later than September 30, 2013. If you do not respond with the requested information or a justification why additional time is necessary, then your application

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<sup>7</sup> The Corps notes that a perpendicular crossing of the TBW utility line is planned within the Starkey Ranch development near Gunn Highway. Additionally, the portions of the Tower Road that parallel TBW’s utility line within the Bexley Ranch development were coordinated with Newland Communities and TBW and it was determined that installing protective casings at future road crossings with the Bexley Ranch development would be sufficient for TBW.

<sup>8</sup> The 2035 LRTP, published December 10, 2009, features the future construction of Tower Road. The Development Order for Bexley Ranch, authorized by Pasco County on April 7, 2008, requires the developer to construct Tower Road through the property and eastward to US-41. The Development Agreement for the Starkey Ranch Master Planned Unit Development, authorized by Pasco County on November 15, 2012, requires the construction of Tower Road from its western to eastern property boundary. The Development Agreement for the Legacy Development, authorized by Pasco County on December 15, 2009, requires the developer to donate right-of-way along the project boundary for the future construction of Tower Road. These Development Orders and Agreements require the construction and/or allocation of right-of-way for roughly 90% of the alignment for the Tower Road alternative.

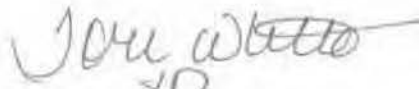
<sup>9</sup> As FDOT intends to begin widening SR-54 from 4 to 6 lanes between the Suncoast Parkway and US-41 in July 2014, this widening should be considered as part of the no-action alternative. Please redefine project alternatives 4, 5, 12, and 14 accordingly.

<sup>10</sup> E.g., adding 2 lanes to SR-52 and 2 lanes to SR-54, for a total of 4 lanes, etc.

will be considered withdrawn or a final decision will be made, whichever is appropriate. If additional time is requested, the district engineer will either grant the time, make a final decision, or consider the application withdrawn.

If you have any additional questions or concerns, please contact Tracy Hurst at 813-769-7063, or by email at Tracy.E.Hurst@usace.army.mil.

Sincerely,



Donald W. Kinard  
Chief, Regulatory Division

Enclosure  
Alternatives Analysis Process guidance document

CF: (w/encl):  
Ms. Michele Baker, Pasco County Board of County Commissioners, 7530 Little Road, Suite 320,  
New Port Richey, Florida 34654

Mr. Ron Miedema, Wetlands and Marine Regulatory Section, U.S. Environmental Protection  
Agency, 61 Forsyth Street, Atlanta, Georgia 30303-8960

## Alternatives Analysis Process

As part of the Department of the Army (DA) permit process the U.S. Army Corps of Engineers (USACE) is required to identify, review and analyze alternatives that could achieve the purpose and need for a project. In effect, the USACE must evaluate alternatives that are reasonable, feasible, prudent, and practicable that might accomplish the overall project purpose. The Corps conducts this analysis pursuant to the following regulations:

- 1) 404(b)(1) Guidelines (40 CFR 230.10)
- 2) National Environmental Policy Act (NEPA) analysis (CEQ regulations 40 CFR 1500-1508)

Although these two requirements of alternative analysis are discussed separately below; applicants should not conduct or document separate alternatives analysis for the two regulations. There is sufficient overlap that one review will likely satisfy both regulations if the identified alternatives are adequately developed, considered, and analyzed. The amount of analysis performed must be commensurate with the severity of the environmental impact. That is, the more severe the impacts (quantity and/or quality) the more in-depth and detailed the applicant's alternatives analysis must be.

### Alternatives under 404(b)(1) (restrictions on discharges CFR230.10):

USACE may only permit discharges that represent the **least environmentally damaging practicable alternative (LEDPA)** so long as the alternative does not have other significant adverse environmental consequences. The 404(b)(1) Guidelines require a detailed discussion of "practicable" alternatives to the proposed project. In all cases, where discharge (filling) of material into special aquatic sites is not "water dependent", practicable alternatives that do not involve special aquatic sites are presumed a) to be available and b) to have less adverse impact on the aquatic environment, unless clearly demonstrated otherwise.

### Alternatives under NEPA:

Identifying and studying alternatives to a proposal is the key to the NEPA process. NEPA requires a detailed discussion of "reasonable" alternatives to the proposed action and requires that the Corps to take "a hard look" at the alternatives. NEPA does not require that the alternative chosen be the least impactful, but does require that all reasonable alternatives that satisfy the project purpose and need be evaluated fairly and consistently. Applicants should present an evaluation of the proposed action and all the alternatives in a comparative form, to define the issues and provide a clear basis for the choice among the options. For NEPA, alternatives that are not available to the applicant may be considered.



## STEPS FOR AN ALTERNATIVES ANALYSIS

### 1. Define Purpose and Need

Under NEPA, the Corps looks at Alternatives that meet the Project's purpose and need. Under the 404(b)(1) Guidelines the Corps looks at Alternatives that meet the overall project purpose.

In an Alternatives Analysis, the applicant should clearly state the project purpose and need and the Overall Project Purpose. Significant thought should be applied when developing the project purpose as it will drive the alternatives analysis under both NEPA and the 404(b)(1) Guidelines.

- a. A well-described justification of the projects' purpose and need can often prevent the long, drawn out negotiations or additional analysis to clearly demonstrate that an alternative is not practicable. It is highly recommended that the applicant identify the project's purpose and need upon submittal of an application to the Corps.
- b. Note that the Corps determines the Overall Project Purpose in the Public Notice for a project. Although the Corps considers the applicant's stated project purpose when determining the Overall Project Purpose, the Corps can modify that project purpose without approval from the applicant.
- c. The applicant should use the Overall Project Purpose given in the Public Notice to identify the Alternatives (next step). The applicant should not modify the Overall Project Purpose from that identified by the Corps in the Public Notice without approval. Doing so may result in an Alternatives Analysis that does not satisfy the Corps requirements. The applicant may identify their project purpose as well as the Corps defined project purpose, but the review should be based on the Corps identified project purpose.
- d. The overall project purpose must be specific enough to define a permit applicants' needs, but not so restrictive to preclude alternatives. It should also not be too wide ranging without consideration for the applicant's needs.
  - i. Too restrictive because there are no alternatives: To develop a 150-unit residential development at the Southeast intersection of I-95 and America Boulevard.
  - ii. Too wide if the applicant intends to construct homes for the Jacksonville market: To develop a residential development in North Florida.

- e. The geographic boundary in the overall project purpose also defines the geographic boundary of the alternatives analysis. In the examples above, the geographic boundaries were either the "southeast intersection of I-95 and America Boulevard" or all of "north Florida". The geographic boundary should be reasonably set to define the area of alternatives and should be based on the project purpose.

## **2. Identify Alternatives**

Describe Alternatives that would meet the Corps given Overall Project Purpose including

- a. The proposed alternative
- b. Alternatives that would involve no discharges of dredged or fill material into waters of the US. (no-action, off-site, on-site options).
- c. Any alternatives that would involve less adverse impact to waters of the US. (off-site, on-site options). These would include design modifications to projects (see more in #5).
- d. Any alternatives that would involve greater adverse impact to waters of the US., but less impacts to the environment overall (off-site, on-site options), (for example: impacting more low quality wetlands instead of fewer acres of high quality wetlands; impacting a site surrounded by development instead of a site that has been identified as a potential restoration site).
- e. Any alternative site layouts, alignments, or design options in the physical layout and operation of a facility. Presenting these options as alternatives to the public and the regulatory agency early in the process will facilitate the NEPA process and provide an effective Alternatives Analysis. This approach may reduce revisions to the proposed project which can save time and may also reduce reasons for appeals or legal challenges later on.

Tip - At this stage, do not rule out Alternatives based on their being impracticable or unavailable.

## **3. Screen the Identified Alternatives for future Analysis**

Which of the alternatives should NOT be screened out??

- a. The "No-Action Alternative" Alternatives that would involve no discharge of dredge or fill material into Waters of the U.S. (**No-Action Alternative**, upland alternative on-site, upland alternative off-site) are required. Although the "No-

Action" alternative might not seem reasonable, **it must always be included in the analysis.** The no-action alternative can serve several purposes. First, it may be a reasonable alternative, especially for situations where the impacts are great and the need is relatively minor. Second it can serve as a benchmark, enabling decision makers to compare the magnitude of the environmental effects of the action alternatives.

- b. The proposed or preferred alternative should be clearly identified and discussed objectively at a comparable level of detail to all other action alternatives.
- c. All reasonable alternatives. The maximum amount of reasonable alternatives will vary and depends on the nature of the proposed project but there typically should be multiple alternatives considered. Unreasonable alternatives do not have to be considered. [This is not intended to rule out things that are "unreasonable" according to the applicant, but things that would be considered "unreasonable" to a non-interested party, like a judge.]

Which of the alternatives CAN be screened out??

- d. Alternatives that could not reasonably satisfy the project purpose.
- e. Alternatives that are outside the geographic boundary identified in the Overall Project Purpose.

For projects with a large number alternatives using an "alternatives screening process" which separates alternatives into categories or levels based on the parameters for which they were evaluated may prove helpful. If any alternatives were eliminated from detailed study because they could not reasonably satisfy the project purpose, provide a brief discussion of reasons for eliminating them.

#### **4. Analyze the Identified Alternatives**

What are issues I should address in the alternatives analysis?

- a. *Include the following minimum information for each alternate site examined:*
  - i. Specific parcel information including, but not limited to; parcel ID numbers, aerial photos, location maps, FLUCCS codes and GPS coordinates;
  - ii. Presence, quantity and quality of wetlands;
  - iii. County/City zoning designation;
  - iv. Availability for purchase, and an evaluation explaining if the proposed costs are reasonable or practicable;
  - v. The presence or any federal listed endangered species or the presence of any historical properties

- vi. Existing site access. Will the site require new access roads/infrastructure? What are the potential impacts associated with these improvements?
- vii. In addition to the in depth analysis, alternatives should be clearly listed and numbered for ease of reference and comparison by the Corps project manager.

*b. Identify the Environmental Impacts.*

- i. State what the impacts are (beneficial or adverse) to the aquatic ecosystem.
- ii. State the overall (beneficial or adverse) environmental impacts.
- iii. Be specific and qualitative in this identification of impacts.
  - 1) Instead of "Alternative A results in a large impact to low quality wetlands and ditches with little vegetation,
  - 2) Use "Alternative A will result in filling of 2.1 acres of herbaceous wetland habitat and 1.2 acres of fallow farm ditches with a herbaceous fringe of wetland habitat. The function and value of the herbaceous wetland and ditch system have been calculated with Uniform Mitigation Assessment Method and are valued at 0.3 and 0.15, respectively."
- iv. Be fair and accurate in the representation of impacts. Neither NEPA nor the 404(b)(1) Guidelines require the alternative chosen be the alternative with the least impacts. NEPA requires a "hard look" and a "fair disclosure" of impacts; the 404(b)(1) Guidelines require that the Least Environmentally Damaging Practicable Alternative be chosen. Do not attempt to minimize a favored alternative's effects or maximize the effects for an un-preferred alternative.

*c. Address the consequences on the applicant and the public if the project is not implemented.*

*d. Address practicability of each alternative.*

- i. Alternatives that are **practicable** are those that are available and capable of being done by the applicant after considering the following (in light of the project purpose):
  - **Cost** (Transportation cost or transportation needs, utilization of existing infrastructure such as existing power or water supplies or the requirement to construct infrastructure)
  - **Existing Technology** (is the most efficient/ less impacting construction methods currently available being used)
  - **Logistics** (placement of facilities within a required distance, utilization of existing storage or staging areas, safety concerns, what access does the applicant have to a parcel)

- ii. The 404(b)(1) Guidelines state that if it is otherwise a practicable alternative, an area not presently owned by the applicant which could reasonably be obtained, utilized, expanded, or managed in order to fulfill the overall purpose of the proposed activity should be considered. In other words, if the applicant doesn't own an alternative parcel, that doesn't rule that parcel out as a practicable alternative.

**5. Compare alternatives to identify which is the least Environmentally Damaging Practicable Alternative.**

- a. An alternatives comparison matrix is a very effective way to present multiple alternatives and highlight the main parameters (e.g. wetland impacts, listed species, cultural resources, high value uplands, etc.) that were considered during the evaluation.
- b. Be specific in the comparisons that lead to the choice of the LEDPA. Explain why the alternative was chosen based on quantitative review. This is intended to be a fair comparison of alternatives that meet the project purpose.
- c. Remember, the LEDPA is the *Least Environmentally Damaging Practicable Alternative*. Do not attempt to sell the project in this analysis. Of the alternatives that meet the project purpose, the LEDPA must be the one that is actually the *least environmentally damaging*. It may result in less impacts, but it will also result in a quicker decision and much less time spent in permitting if the analysis provided is accurate.
- d. An effective Alternatives Analysis can be undone in the end through a biased analysis. Stating the facts and explaining clearly why a particular alternative was chosen over another alternative is the most effective use of an applicant's time and money.