

## **NEPA Efficiencies and EA Length**

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In a recent Shipley workshop the sample Environmental Assessment (an actual agency document) was at least 30 percent longer than it needed to be. Workshop attendees concluded that much of the information in the EA was not relevant to impact conclusions actually discussed in the Environmental Assessment (EA). They also noted that the organization of the text in Chapter 4 (the traditional chapter for disclosing impacts) did not highlight specific impact conclusions, nor explain conclusions with credible rationales.

The workshop participants were unanimous that the EA did not support a Finding of No Significant Impact (FONSI). Their reasons mainly reflected the EA's failure to clearly label and then to explain impact conclusions.

The EA's flaws validate conclusions in the recent Council on Environmental Quality (CEQ) memo on possible NEPA Efficiencies. That memo suggests ways to streamline NEPA analyses. In simplest terms, EAs should be concise, clear discussions of major impacts that influence decisions! Nancy Sutley, the Chair of the CEQ issued this memo in its final version on March 6, 2012. For additional information about this memo see Shipley newsletter 87 (February 2012), which is available in the Shipley archive of newsletters at <http://www.shipleygroup.com/environmental/index.html?pg=news>.

Shipley National Environmental Policy Act (NEPA) workshops routinely address two legal mandates for either an Environmental Assessment or an Environmental Impact Statement (EIS):

- 1. Identify and analyze all potential impacts.**
- 2. Disclose impacts to all interested and affected parties**, including the agency's decision makers, other governmental groups, Native American tribes, and individual citizens (or groups of citizens).

**The following newsletter covers a federal agency's legal responsibility for identifying impacts and for efficiently interpreting these impacts for any and all readers/users to use in evaluating alternatives.** Here are the potential steps for an agency to use in identifying and then disclosing the impacts both clearly and efficiently:

- 1. Identify/list all potential impacts, both major ones and negligible ones.**
- 2. Prioritize impacts, with a focus on those that might be significant (that is, relevant to the agency's final decision).**
- 3. Identify and briefly mention impacts that are judged as not relevant to a decision on the agency's Proposed Action.**

4. Choose a strategy for measuring and then disclosing the projected context and intensity for all impacts judged to be relevant to the final decision.
5. For all major impacts of relevance, translate the prior steps into scope decisions about the depth of the necessary analysis and the length of the necessary impact analyses in an EA or EIS.
6. Include step 5 information into task assignments for both external NEPA contractors and for internal resource specialists who will be working on sections of an EA or EIS.
7. Check the evolving EA or EIS to verify that it is clearly providing context and intensity information for all impacts of relevance to the decision.

These steps are clearly present in most agency NEPA handbooks and other documentation guidance. I am summarizing the steps in these seven separate recommendations. My 30 years of NEPA experience suggests to me that many agency EAs and EISs fail to follow these steps very carefully.

### **1. Identify/list all potential impacts, both major ones and negligible ones.**

Identify all potential impacts/effects in an early scoping meeting (usually, after both the Proposed Action and likely alternatives are known).

Agency checklists are often a good starting point, as a reminder not to overlook impacts of possible concern.

Attached at the end of this newsletter is a Shipley checklist from *How to Write Quality EISs and EAs* (a Shipley Group publication). This checklist originally came from a Forest Service list of resource topics. The column heading are Shipley Group suggestions for tracking information about possible impacts.

### **2. Prioritize impacts, with a focus on those that might be significant (that is, relevant to the agency's final decision).**

Prioritizing impacts has been a NEPA analysis step for over 40 years. The Council on Environmental Quality (CEQ) Regulations (issued in 1978) suggest in Section 1501.7(a)2 that agencies should identify "significant [resource] issues." Then Section 1501.7(a)3 suggests "eliminat[ing] from detailed study the issues which are not significant."

CEQ's memo of March 6, 2012 lists in the first bullet item in its summary of basic principles the recommendation that "reviews and documentation are proportionate to potential impacts and effectively convey the relevant considerations to the public and decisionmakers." This step is what I am recommending in step 2 of this newsletter.

Major issues (often called impact topics) have one or several of these features:

- **Measurable impacts (from their projected context and intensity) of a moderate or even major degree**, such that anyone reviewing the agency's potential decision would need to consider these impacts in choosing between alternatives.
- **Measurable impacts (especially when adverse) to special legal and regulatory resources, such as threatened or endangered species, cultural resources or properties, or adversely affected wetlands.** Note that all such impacts require consultation with specific agencies and often a regulatory response/permit.
- **Measurable impacts on any valuable resources likely to be affected, besides those listed in the preceding bullet.** See CEQ Regulations, Section 1508.27 for a checklist of important resources (ones of high concern to governmental agencies and to the public).
- **Special impact concerns from any interested or affected parties.** Such concerns should properly arise during routine NEPA scoping activities. Such activities often begin with a written notice that an agency is beginning to conduct scoping; next come one or more public meetings; finally, most agencies routinely circulate a review copy of an EA or a Draft EIS for public review and comment. Note that agencies must track and respond to all comments even if the agency judges that a specific comment is not relevant or is not based on valid information.

### Highlighting Major Impacts

Once identified, major, relevant impacts should be highlighted in the document. Readers of an EA or EIS should learn in Chapter 1 what impacts are of major importance and which impacts are to be briefly discussed. Shipley's recommended outline for an EA or EIS suggests that Section 1.6 list and then briefly profile major issues/impact topics. As an option, Section 1.6 ends with a list of minor impacts to be given only brief discussions in an EA or EIS.

No reader should finish Chapter 1 in an EA or EIS without a clear roadmap as to which impact topics will be most important throughout later chapters. This recommendation parallels plainlanguage.gov standards, which apply to NEPA documents as well as other government documents. Good chapter or section previews have always helped make technical documents clearer and more credible.

### **3. Identify and briefly mention impacts that are judged as not relevant to a decision on the agency's Proposed Action.**

Limiting minor, unimportant information is a key step in any NEPA scoping discussion. NEPA practitioners need to learn when enough is enough!

Minor issues (or impact topics) are just what it says, minor concerns. Minor impacts are those that do not influence the final agency decision to any measurable degree. So, as in a trivial case, if minor construction work creates dust and generates vehicle exhaust fumes for up to a month, the impacts

are so trivial as to be considered negligible. Text discussing such impacts should be accordingly negligible.

As a more complex example, suppose the State Historic Preservation Officer (or optionally, a Tribal Historic Preservation Officer) agrees that the impacts on cultural resources of a chosen alternative are a low probability. If the SHPO/THPO provides a concurrence letter, then the cultural resource discussion in an EA or EIS should be appropriately brief. Notice that this brief discussion does not remove the need for early and careful consultation. Documents about this consultation would be in the project records, but the scope of impact projections in an EA or EIS would be limited to a brief discussion of the unlikely and negligible impacts. So as I suggest below in steps 5 and 6, the actual cultural resource text should be at most a page or two.

#### **4. Choose a strategy for measuring and then disclosing the projected context and intensity for all impacts judged to be relevant to the final decision.**

**Agency specialists should consider as early as possible in project planning how they intend to disclose the context and the intensity of identified impacts.** See Section 1508.27 in the CEQ Regulations for guidance that highlights the need for context and intensity information as part of any impact discussion.

If possible, impact projections should have quantified values that differ across the alternatives to be analyzed.

**Context** suggests the potential area, as in a geographic area. A designated area of potential impacts are especially important in cases where cumulative impacts are a concern.

Context also covers the stipulated scope of the discussion. For example, impacts on deer might deal only with their reproductive success (that is, the survival rates of fawns). Subjects such as predator population estimates might be outside the scope of analysis on the actual deer population.

**Intensity** often links to quantified measurements of identified variables. Classic examples of such indicators are ones such as these:

- Acres of habitat, wetlands, or other land to be affected. The quantified acres function as a summary tool for analyzing overall effects. For example, acres of habitat might serve as forage/food, escape terrain (for goats, perhaps), or cover during winter storms. So as in these examples, even a numerical value must be explained as to its usefulness.
- Days of recreational access. Again, what sort of recreational access or activities will occur? Explanation is essential.

- Miles of stable shoreline habitat. The accompanying text could profile the amount and kind of riprap, the density of shoreline vegetation, and even the plant species in the shoreline vegetation.
- Useful floor space in a newly renovated facility (likely expressed in square feet per occupant or for an activity).
- Projections of fawn survival rates. Note that the rate estimates reflect all sorts of factors from the amount of spring rain to predation from hungry mountain lions.

As in the preceding examples, even common terms and useful assumptions need careful explanations. Remember to always provide a clear explanation of “because” for every impact discussion.

### Subjective Judgment Words as Impact Indicators

NEPA practitioners often use a judgment word along with quantified analysis information, such as the quantified numerical indicators listed above. The purpose of such judgment words is to help lay readers understand just how important or unimportant numerical values are.

Such scales of judgment words often reflect a scale of increasing values—for example a range of terms: *negligible*, *minimal*, *moderate*, and *major*. Credible documents include careful discussions about what each of these judgment terms means for each separate resource and the associated quantified impact projections.

Note that the range of judgment words avoids introducing discussions of “significance.” Agency NEPA practitioners are responsible for sound, credible context and intensity information. Judgments about possible significance are properly the agency’s decision when it decides if the context and intensity information in an EA supports a possible FONSI.

### **5. For all major impacts of relevance, translate the prior steps into scope decisions about the depth of the necessary analysis and the length of the necessary impact analyses in an EA or EIS.**

A resource specialist should address this step, with input and review from a NEPA team leader and, if possible, agency managers. In specific terms, each resource specialist (for major impacts of concern) should answer a number of analysis and documentation questions:

- **How many hours/days will be required for a search of the relevant published research literature?** The estimated times should include all the times necessary for recording the relevant information, including copies of key pages or sections of the published information. (Reminder: If a recent NEPA document has recorded this information, then the time estimates are appropriately shortened.)
- Does any recent agency document already have available a good survey of the published literature? **How many hours/days would it take to adapt this prior NEPA information into a**

**form usable in a new EA/EIS?** Tasks include verifying citations and consolidate bibliographies.

- How many hours/days of field work will be necessary? Can this time be done in a block or does it need to be spread over several seasons? Times include the collation and processing of the field notes into memos for the NEPA analysis file.
- **How many hours/days are necessary for recording the information into usable information for publishing in an EA or EIS?** Documents include these: Appendix report (if necessary); issue profiles (for Chapter 1); resource profile for Chapter 3 (Affected Environment); impact discussions for Chapter 4 (Environmental Consequences); Impact summary information for Chapter 2; and a brief Data Adequacy discussion, combining information from the published literature with comments and questions from other agencies or the public.
- **How many additional hours/days reviewing other sections of the EA or EIS and validating the consistency of all recorded information?**
- **How many hours/days are needed to meet with other team members to design alternatives, identify mitigations, and coordinate and review all of the necessary NEPA information?**

The preceding questions ask for hours or days. Such questions are the only way to control both project times and associated costs. After all, if a NEPA project is contracted out, the contractor and the contractor's employees will be asking and answering the same questions. So agency employees need to begin projects with the same information.

If an agency NEPA team ignores questions about times and budgets, then management of contract activities are out of control. As I suggest below in step 6, NEPA practitioners need to begin with aggressive decisions about the scope of needed information and necessary sections to be written.

If agency personnel (especially resource specialists) don't address these questions, the agency is at the mercy of a contractor's decisions about times and budgets.

### **6. Include step 5 information into task assignments for both external NEPA contractors and for internal resource specialists who will be working on sections of an EA or EIS.**

Review the questions above in step 5. Answers to the step 5 questions translate into a list of tasks for contributors to a NEPA project.

Next, an agency NEPA coordinator and/or agency manager should review the proposed tasks for their reality/acceptability. Agencies need to control the time and the nature of submitted NEPA information, whether from agency employees or from contractor employees.

**Let me end with a plea for starting with target page estimates before ever beginning to write/draft sections of an EA or EIS or even do field work for a NEPA project.**

As a contractor, my first question in bidding a federal project is this: How long is the estimated EA or EIS (in pages)? Often the agency's Statement of Work fails to include page targets. If so, I check for the number of alternatives and an estimate of what resources are major impact topics. Then, in my proposal back to the agency, I base my tasks (and final bid) on a not-to-exceed page estimate. My formal proposal will say that tasks and associated budgets assume an EA/EIS of no more than 125 pages of text and graphics (not including appendixes, if prepared by agency personnel).

The preceding discussion attempts to simplify the contracting/bidding process. Both internally and in a contract situation, I always start with a projected vision of the length (in pages) of the final product. My current boss often asks me how long it will take me to reply to a request or to prepare a more detailed report. My first concern is how long the document is likely to be. Only then can I tell my boss an estimated deadline.

As a suggestion, survey your agency's last EAs or EISs for their average length (in page numbers). For your next EA or EIS, start with a page estimate perhaps 20 percent shorter than the prior average. A target of 30 percent shorter would be even better.

As CEQ's guidance memo (cited in the opening paragraphs of this newsletter) suggests, use appendixes, incorporation by reference, and other streamlining techniques in your EAs and EISs.

### **7. Check the evolving EA or EIS to verify that it is clearly providing context and intensity information for all impacts of relevance to the decision.**

This last step is essentially a Quality Assurance (QA) check. A content reviewer (preferably one who has not worked on the EA or EIS) checks all Chapter 4 impact sections for clear impact conclusions, quantified if possible. Then does each identified conclusion have a clear discussion of its context and intensity? Could a lay reader understand the seriousness of the impacts identified?

For additional QA information, see Shipley newsletter 75 (September 2010).

If the external reviewer fails to find impact conclusions, the NEPA team needs to do repair work!

Repairs were what the EA needed that I mentioned in the opening page of the newsletter. That EA failed to complete most of the seven listed steps in this newsletter. As the workshop participants observed, without good impact information, clearly presented, a FONSI is impossible despite pages or pounds of technical information.

# Environmental Factors Checklist

*Directions: Check the appropriate columns to indicate that the interdisciplinary team has addressed each of these factors. For those factors with background documentation, indicate where readers can find the information—in the EA, in the appendices, or in the analysis file. As appropriate, include this checklist in an appendix or in the analysis file.*

Factors	In EA	Analyzed, Not in EA	Not Applicable	Background Documentation (Location)
<b>Physical Factors.</b>				
1. Location.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. Geomorphic/physiographic.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Geologic hazards.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Unique land forms.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. Climate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
4. Soils.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Productivity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Capability.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
(1) Erodibility.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
(2) Mass failure.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
5. Minerals and energy resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Locatable minerals.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Leasable minerals.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Energy sources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
6. Visual resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
7. Cultural resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Archaeological.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Historical.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Architectural.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
8. Wilderness resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
9. Wild and scenic rivers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
10. Water resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Water quality.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Streamflow regimes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Floodplains.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d. Wetlands.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e. Ground water recharge areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
11. Air quality.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____



## Environmental Factors Checklist

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Factors	In EA	Analyzed, Not in EA	Not Applicable	Background Documentation (Location)
12. Noise.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
13. Fire.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Potential wildfire hazard.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Role of fire in the ecosystem.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
14. Land use including prime farm, timber, and rangelands.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
15. Infrastructure improvements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Roads.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Trails.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Utility corridors and distribution.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d. Water collection, storage.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e. Communications systems.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
f. Solid waste collection and disposal.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

### Biological Factors.

1. Vegetation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Forest, including diversity of tree species.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Rangeland, including conditions and trends.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Other major vegetation types.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d. Threatened or endangered plants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e. Research natural area (RNA) potentials.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
f. Unique ecosystems (other than RNAs).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
g. Diversity of plant communities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
h. Noxious weeds.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. Wildlife.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Habitat.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Populations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Threatened or endangered species.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d. Diversity of animal communities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e. Animal damage control.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Factors	In EA	Background Analyzed, Not in EA	Not Applicable	Documentation (Location)
3. Fish.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Habitat.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Populations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Threatened or endangered species, including State- listed species.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
4. Recreation resources (usually a combination of physical and biological factors).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
5. Insects and diseases.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
6. Exotic organisms; for example, Russian thistle, Siberian ibex.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

**Economic Factors.**

1. Economic base.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. Employment/unemployment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. Housing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
4. Land use requirements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
5. Community service requirements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
6. Revenue base.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Local general government.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Special service districts.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
7. Plans and programs of other agencies.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
8. Income.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Sources.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Amounts.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Distribution.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
9. Cost.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Financial analysis (who pays for what, when).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

**Social Factors.**

1. Population dynamics.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Size (growth, stability, decline).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Composition (age, sex, minority).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Distribution and density.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

## Environmental Factors Checklist

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Factors	In EA	Background Analyzed, Not in EA	Not Applicable	Documentation (Location)
d. Mobility.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e. Displacement.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. Social institutions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Educational.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Family.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Economic.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d. Political.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e. Military.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
f. Religious.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
g. Recreation/leisure.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. Special concerns.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Minority (civil rights).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Environmental justice.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Historic/archaeological/ cultural.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
4. Ways of life—defined by.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a. Subcultural variation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Leisure and cultural opportunities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Subsistence hunting and fishing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d. Personal security.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e. Stability and change.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
f. Basic values.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
g. Symbolic meaning.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
h. Cohesion and conflict.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
i. Community identity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
j. Health and safety.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
5. Land tenure and land use.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
6. Legal considerations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____