Texas Department of Transportation
Environmental Affairs Division

Standards of Uniformity for Projects Without Federal Highway Administration Involvement

A Guide to Projects without FHWA Involvement

Indirect and Cumulative Impacts

	YES	NO	N/A	Description of Item Sufficiency	References/Guidance
Indirect and Cumulative Impacts					
1				**1.** To determine if **an indirect impacts analysis** is required, follow the Screening tools in Appendix C of the current *Revised Guidance on Preparing Indirect and Cumulative Impact Analyses*. The *Screening Tool for Indirect Impacts Documentation* must be completed and retained in the project file and/or appended to the environmental document, along with any additional information needed to explain how the screening tools were applied to the project.	*Revised Guidance on Preparing Indirect and Cumulative Impact Analyses*
2				**2.** To determine if a **cumulative impacts analysis** is required, follow the Screening tools in Appendix C of the current *Revised Guidance on Preparing Indirect and Cumulative Impact Analyses*. The *Screening Tool for Cumulative Impacts Documentation* must be completed and retained in the project file and/or appended to the environmental document, along with any additional information needed to explain how the screening tools were applied to the project.	
3				**3.** If both of the above checklists indicate that no further analysis is required, the document should indicate that no analysis is required. (item sufficiency triggers **4 through 27** do not apply in this situation). The following text may be used: *A screening level analysis was performed for the proposed project. The results of this analysis indicated that the project is not likely to result in indirect or cumulative impacts; therefore, no further analysis is required.* This statement must be followed by a discussion of how the screening tool was applied. Discuss any question in the tool that corroborates the conclusion that no	

	YES	NO	N/A	Description of Item Sufficiency	References/Guidance
				further analysis is needed, and describe how that question was answered for the project. All answers should be fully supported in this discussion. This discussion should be similar to the example provided in the guidance.	
4				**4.** If the screening checklist indicates that an analysis of indirect effects is required, the item sufficiency triggers outlined in rows **5 through 16** below must be met.	
5				**5.** The indirect impacts analysis must clearly address each of the following seven steps described in TxDOT's *Revised Guidance on Preparing Indirect and Cumulative Impact Analyses*.	
6				**6.** *Step 1: Scoping* includes a description of, and the rationale behind the selection of, the Area of Influence (AOI) defined for the project.	
7				**7.** *Step 1: Scoping* includes a description of, and the rationale behind the selection of, the future year that defines the temporal boundary of the analysis.	
8				**8.** *Step 2: Identify the Study Area's Goals and Trends* describes any plans or policies that would affect development in the AOI.	
9				**9.** *Step 2: Identify the Study Area's Goals and Trends* describes ongoing growth trends in the AOI.	
10				**10.** *Step 3: Inventory the Study Area's Notable Features* includes a discussion of any specific sensitive, unique, vulnerable, or valued features of the AOI's ecosystem or community(ies).	
11				**11.** *Step 4: Identify Impact-Causing Activities of the Proposed Action* breaks the project down into component activities that may result in impacts to the environment. These may be described in relation to the general categories of	

	YES	NO	N/A	Description of Item Sufficiency	References/Guidance
				impact-causing activities listed below: • Modification of regime • Land transformation and construction • Resource extraction • Processing • Land alteration • Resource renewal activities • Changes in traffic • Waste emplacement • Chemical treatment • Access alteration	
12				**12.** *Step 5: Identify Potentially Substantial Indirect Effects For Analysis* clearly describes the reasons why an impact does or does not need to be analyzed further. Impacts may be discussed in terms of three general categories: • Encroachment-alteration effects • Induced growth effects • Effects related to induced growth	
13				**13.** *Step 6: Analyze Indirect Effects and Evaluate Results* includes a detailed analysis of each effect that was identified in Step 5 as requiring further analysis. The methods of analysis should be appropriate for the scale and scope of the project (see Appendix D of the *Revised Guidance on Preparing Indirect and Cumulative Impact Analyses* for an overview of analysis types).	
14				**14.** *Step 6: Analyze Indirect Effects and Evaluate Results* includes details on the underlying logic and assumptions, adequate to clearly support each conclusion.	
15				**15.** *Step 6: Analyze Indirect Effects and Evaluate Results* includes a discussion of the uncertainty associated with the	

	YES	NO	N/A	Description of Item Sufficiency	References/Guidance
				analysis results, including the assumptions used and any unavailable data.	
16				**16.** *Step 7: Assess Consequences and Consider/Develop Mitigation (When Appropriate)* discusses the relative importance of the impact and identifies any potential mitigation strategies that could offset the impact.	
17				**17.** If an indirect impacts analysis was required, but the screening checklist indicates that a cumulative impacts analysis is *not* required, the document should indicate that no analysis is required. (Item sufficiency triggers **18 through 27** do not apply in this situation.) The following text may be used: *A screening level cumulative impacts analysis was performed for the proposed project. The results of this analysis indicated that the project is not likely to contribute to cumulative impacts; therefore, no further analysis is required.* This statement must be followed by a discussion of how the screening tool was applied. The discussion should cover each question in the tool needed to reach the conclusion that no further analysis is needed, and how each question was answered for the project. All answers should be fully supported in this discussion; it should be similar to the example provided in the guidance.	
18				**18.** If the screening checklist indicates that an analysis of cumulative effects is required, item sufficiency triggers **19 through 27** must be met.	
19				**19.** The cumulative impacts analysis clearly addresses each of the following eight steps described in TxDOT's *Revised Guidance on Preparing Indirect and Cumulative Impact Analyses*.	

	YES	NO	N/A	Description of Item Sufficiency	References/Guidance
20				**20.** *Step 1: Identify the Resources to Consider in the Analysis* clearly indicates which resources are to be analyzed and the rationale behind selection of those resources.	
21				**21.** *Step 2: Define the Study Area for Each Resource* describes the boundaries of, and the rationale behind the selection of, an appropriate Resource Study Area (RSA) for each resource identified in Step 1.	
22				**22.** *Step 2: Define the Study Area for Each Resource* gives a past and a future year to be used for the temporal boundaries of the analysis, and describes the reasons for the selection of these years.	
23				**23.** *Step 3: Describe the Current Status/Viability and Historical Context for Each Resource* describes the status and context of each resource within its RSA.	
24				**24.** *Step 4: Identify Direct and Indirect Impacts of the Project that Might Contribute to a Cumulative Impact* briefly summarizes the direct and indirect effects of the project on each resource. This information must match the results of the direct and indirect impacts analyses.	
25				**25.** *Step 5: Identify Other Reasonably Foreseeable Future Effects* must describe other transportation and non-transportation-related impacts within each RSA. If no other reasonably foreseeable future actions are identified, the document must describe the steps taken to determine that no future actions are planned.	
26				**26.** *Step 6: Identify and Assess Cumulative Impacts* describes the total impact on each resource when direct impacts of the project, indirect impacts of the project, and impacts of other	

	YES	NO	N/A	Description of Item Sufficiency	References/Guidance
				reasonably foreseeable future actions are added together.	
27				**27.** *Step 7: Report the Results* should briefly summarize the results of the analysis and put them into the context of the status of each resource.	
28				**28.** *Step 8: Assess the Need for Mitigation* discusses the relative importance of the impact and identifies any potential mitigation strategies that could offset the impact.	
29				**29.** All conclusions in the document must be clearly supported by facts, logic, and appropriate analyses.	