



2.0 DEVELOPMENT AND DESCRIPTION OF ALTERNATIVES

2.1 ALTERNATIVES ANALYSIS

This EIS will identify and evaluate a range of reasonable and practicable alternatives for the proposed action. The analysis of alternatives serves two purposes: (1) it must meet the requirements of NEPA (reasonable alternatives), and (2) it must provide the basis for the Corps to make specific findings under Section 404(b)(1) of the CWA (practicable alternatives).

NEPA

To comply with NEPA, guidelines developed by the CEQ and the Corps require a detailed analysis of reasonable alternatives and the potential environmental consequences of each so that their comparative merits may be considered by agency decision makers (40 C.F.R. 1502.14[b]). The alternatives evaluation must include the applicant's Proposed Project, a no-action or no-build alternative, and a range of other reasonable alternatives for the Proposed Project. The range of reasonable alternatives can include alternative sites, alternative project configurations, alternative technologies, and alternative project sizes.

Section 404(b)(1) Guidelines

In addition to meeting the requirements of NEPA, the Section 404(b)(1) Guidelines stipulate that the Corps may not issue a Department of the Army (DA) permit without identifying whether the proposed action is the least environmentally damaging practicable alternative (LEDPA). This regulatory review must be supported by an alternatives analysis.

After alternatives have been identified and evaluated, only those alternatives that are found to be reasonable (40 C.F.R. 1502.14[a]) and practicable (40 C.F.R. 230.10 [a][1-3]) are moved forward for detailed review in the Draft EIS (DEIS). "Reasonable" is understood to mean those technically and economically feasible project alternatives that would satisfy the primary objectives of the project defined in the statement of project purpose. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.³⁸ An alternative is considered to be "practicable" if it is, "available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes. If it is otherwise a practicable alternative, an area not

³⁸ 46 Fed. Reg. 18026, at 18027 (March 23, 1981), Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations (<https://ceq.doe.gov/nepa/regs/40/40P1.HTM>)

presently owned by the applicant which could reasonably be obtained, utilized, expanded or managed in order to fulfill the basic purpose of the proposed activity may be considered.”³⁹

An EIS informing a DA permit decision by the Corps must be thorough enough to determine compliance with NEPA and the Section 404(b)(1) Guidelines, as well as all federal, state, and local requirements with respect to the Proposed Project activities and permit approvals. Based on information submitted by Palmetto Railways (Appendix B) and the Corps’ independent review, the Corps has completed an initial identification, screening, and evaluation of all alternatives for the Navy Base ICTF, and has identified the alternatives to be evaluated in detail in the EIS. The alternatives analysis conducted by the Corps and described in this EIS complies with NEPA, and provides the basis for the Corps to make the required findings under the Section 404(b)(1) Guidelines.

2.2 SCOPING AND DEVELOPMENT OF ALTERNATIVES

Participation by the public, governmental agencies, tribes, and non-governmental organizations is critical to the NEPA process, which requires an early and open process for determining the scope of the issues to be addressed as part of the preparation of an EIS. The Corps has provided and will continue to offer opportunities for participation through review of the Final EIS. Input for the scope of the EIS was obtained through a scoping process that included the following elements:

- **Initiation of the scoping process via the Notice of Intent (NOI).** The Corps, Charleston District, initiated the public scoping process with the publication of the NOI in the *Federal Register* on October 23, 2013.
- **Public scoping meeting and comments.** The Corps conducted a public scoping meeting on November 14, 2013, to solicit public, agency, and Tribe comments.
- **Scoping comment period.** Written and oral comments were received via email, letters, and the project website (www.NavyBaseICTF.com) during the public scoping meeting and during the scoping period, which ended on December 14, 2013.
- **Additional Comments:** The Corps received additional comments after the formal scoping period, and these comments have been considered in the development of the EIS.
- **Second public scoping meeting and comments.** The Corps conducted a second public scoping meeting on October 27, 2015, to inform the public, agencies, and Tribes of the revised project and to solicit comments.
- **Second scoping comment period.** Written and oral comments were received via email, letters, and the project website during the additional public scoping meeting and during the scoping period, which ended on November 27, 2015.
- **Additional Comments:** The Corps received additional comments after the second formal scoping period, and these comments have been considered in the development of the EIS.

³⁹ 40 C.F.R. 230.10 [a][1-3]