

No-Action Alternative

Terminology

- ***No-Action Alternative (NEPA)*** - Discussion required in EISs
- ***No-Project Alternative (CEQA)*** - Discussion required in EIRs
- **The term *No-Action Alternative* will be used to encompass both concepts**
- ***Baseline*** - Any scenario that is used as a basis of comparison in an EIS or EIR. The *No-Action Alternative* is a “baseline” for comparing the impacts of the alternatives

No-Action Alternative

What it is

The *No-Action Alternative*:

- Represents changes to the environment that are likely to occur in the absence of a proposed action
- Provides a “reasonable” baseline for assessing the impacts of the action alternatives
- Discusses the consequences of *predictable* actions by others if the *No-Action Alternative* is selected

No-Action Alternative

What it is not

The No-Action Alternative is not:

- **A comprehensive listing of the facilities or projects that will actually be constructed or implemented during the period of analysis**
- **An endorsement or denial of any actions that might be undertaken by others**
- **Intended to analyze the environmental consequences of actions that might be undertaken by others. Actions by others that are not included in the *No-Action Alternative* will be considered for inclusion in the cumulative actions list and impact analysis**

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Use in environmental analysis

NEPA

- **The *No-Action Alternative* serves as the *baseline* for determining the impacts of the action alternatives by analyzing the incremental effects of the action alternatives to conditions expected under the *No-Action Alternative***

CEQA

- **While action alternatives may be compared to conditions expected under the *No-Action Alternative*, impact significance must be determined based on changes from the *Environmental Setting* (existing conditions)**

Calfed Bay-Delta Program

- **EIS/EIR will compare the action alternatives to both the *No-Action Alternative* and *Existing Conditions***

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Suggested criteria for determining actions by others to be included in the *No-Action Alternative*

An action proposed by others must meet all of the following criteria to be included in the *No-Action Alternative*:

- Criterion 1:* Has the action been approved for implementation?**
- Criterion 2:* Does the action have funding for implementation?**
- Criterion 3:* Does the action have final environmental documents?**
- Criterion 4:* Does the action have final environmental permits and approvals?**
- Criterion 5:* Will the action be part of the No-Action Alternative and not part of an action alternative?**
- Criterion 6:* Would the effects of the action be identifiable at the level of detail being considered for analysis?**