

Indirect and Cumulative Effects FAQ

If I don't have any direct or indirect effects on a resource, do I have to study it for cumulative effects?

No, if you do not have any direct or indirect effects on a resource, you cannot have any cumulative effects, so you do not have to study it.

Is the 2008 Joint Guidance required for WSDOT EISs and EAs? How often will it be required for DCEs?

Yes. The 2008 Joint guidance has been adopted and agreed upon by WSDOT, FHWA, and US EPA for all WSDOT environmental documents. Although it applies to DCE, it generally will not be used since the nature of a DCE should indicate that there are no cumulative effects. The intent is that the guidance be scalable.

How can I tell the difference between indirect and cumulative effects?

Ask yourself "does the proposed project cause the effect?" If the answer is "yes", then it is an indirect effect. Indirect effects are greater in time or further in distance than direct project impacts. They do not consider other's actions or past actions. Cumulative effects include both direct and indirect effects as well as past and reasonably foreseeable future actions. They consider other's actions as well. Table 412 -1 summarizes the differences.

Can significant cumulative effects raise the level of the environmental document from an EA to an EIS?

No, the amount of level of significance of cumulative effects will not change the level of environmental from an EA to an EIS. Cumulative effects are, by definition, not caused by the project. Still, we must identify them.

When should I use the terms "significant" or "significance"?

The term significant or significance has a meaning specific in NEPA (National Environmental Policy Act). For instance, with an EA (Environmental Assessment), identifying significant effects can mean that it is not possible to receive a FONSI (Finding of No Significant Impacts) and an EIS (Environmental Impact Statement) will have to be done. The Council on Environmental Quality (CEQ) published guidance uses both the legal meaning and the common meaning. Unless you are trying to establish that there are significant effects, it often is wiser to use a different term. We recommend caution when using these terms.

How can partnerships with other agencies help me with my cumulative analysis?

Other agencies and organizations may have quantified data, or historical information about a resource useful in your analysis. Involving other organizations can build support for your project, influence design, aid in identifying mitigation opportunities and assist with monitoring.

How do I know a cumulative effect has risen to the level of significance?

Consider the context and level of intensity. For instance: Has the effect moved a species toward extinction, endangered the survival of a historic district or seriously degraded a wetland? These conclusions could definitely be determined to be significant. In other cases, it will not be as clear and the analyst will have to judge whether the cumulative effect is significant or not. Also consider whether it might affect the outcome of your document.