

August 20, 2020 Webinar
NEPA 101 - Roles and Responsibilities
Attendee Questions

If a project in which students or educators plan to collect data is meant to happen in year three of the Omnibus, but we don't know the specific location at the submission stage, does that lead to a SAC on the project? If so, how much time should programs budget for? For example, identify the locations by day X to ensure the SAC can be fully processed by the time the work is meant to start?

- **We recommend you work with you PO. While the exact details of some project activities may not be fully described for out years, if you know the range of possible activities and locations for these activities your PO may be able to complete the full environmental review. If that is not possible then yes, a SAC will be placed on your award. The time required to complete NEPA can vary depending on how many other federal regulations it may trigger, so please engage your PO early and often.**

Does a SAC just restrict funding for that research project or for all research projects submitted for that RFP?

- **Generally SACs restrict funding for a specific project, and often only for specific activities on a project.**

Can we address extension-related activities that require NEPA in the Omnibus or do we need to do NEPA for each activity before it occurs?

- **Engage with your PO early to discuss which elements of your extension proposal will need environmental review. In general if the extension activity includes any research or field activities you will need a worksheet. However, your PO will help you tease out the activities that are exempt from a worksheet, group similar extension-research activities into single worksheets, and identify extension projects that will need individual environmental review and worksheets.**

Re: "If it is a research project, regardless of whether it is in the field or not, we need a questionnaire in order to categorize it correctly": What about extension or education activities?

- **If the extension or education projects involve research or field activities then you need to complete a NEPA questionnaire.**

Why would a NEPA questionnaire be required for modeling work (these projects generally consist of computer time) if there is no field or lab work involved?

- **NOAA's Categorical Exclusions (CEs) are characterized by different types of activities. We need to know the exact activities for the project in order to assign the correct CE. Additionally, researchers will often describe the modeling component of their work in the overall project narrative and scope of work; but in the NEPA worksheet we may discover that they are also conducting sampling or research activities to ground-truth the model. These activities trigger a different environmental review than the overall modeling work. The worksheet helps us**

better understand the full scope of the activities, which may not always be clear in the project narrative.

Which is worse, sending in a NEPA form when you don't need to, or not sending one in when you should have?

- **Having extra NEPA documentation will not hurt you. However, failure to send the NEPA questionnaire can result in delays to processing your awards. Consult with your PO if you don't know whether you need the NEPA questionnaire; they should be able to tell you pretty easily.**

Should we submit PD NEPAs via email?

- **Yes. Please send the PD project NEPA questionnaires to your PO and they will complete the environmental review of these projects.**

Curious about NEPA reporting requirements for Sea Grant extension activities that are not part of research grants and more day-to-day activities or internal project efforts. Should these be reported to the PO and how?

- **If these are new activities not previously described and reviewed in your omnibus then yes you should be sending these projects to your PO. However, we encourage you to work with your PO at the omnibus stage to describe and review the broad scope of your extension portfolio to the extent possible.**

Could you remind us whether student research projects require a NEPA form?

- **If the student is undertaking research activities you need the NEPA questionnaire.**

In GOL, selecting AAR and then SAC, takes you to a drop-down menu for "SAC Name," this is confusing as I have had to hunt and peck looking for the exact SAC to respond to. Can more information be provided than just "new SAC award" or "post award data management." There are usually multiple listings of these. Perhaps attach the amendment number to the specific SAC name?

- **Unfortunately, NSGO does not have control over when an application becomes an amendment to your Omnibus (GMD assigns amendments). As a result, we can not provide this information in the title of the SAC when we write the SAC. If you are in the situation where you are unable to find the correct SAC, please contact your PO and they should be able to look up the amendment for you pretty easily.**

Do we need a separate NEPA for each specific task within a research or extension award?

- **Generally no. Usually you can address all of the activities for a given project into one NEPA form.**

Do all small projects funded at \$5000 or less require NEPA review even if they do not involve any sampling in the environment (like in-facility wastewater sampling)?

- **The funding level does not matter with regards to NEPA. If Sea Grant is funding research activities, regardless of whether it takes place in the field or not, we need the NEPA questionnaire.**

Do undergrad research fellowships need NEPA review?

- **It depends. If the fellowship is funding research activities then you need the NEPA questionnaire. If the fellowship is simply funding salary or a scholarship then you do not.**

Where do we add the explanation for projects that do not need the NEPA compliance form?

- **We want you to treat this NEPA explanation like you do the Data Management Plan explanation. Usually programs include the statement explaining their lack of a Data Management Plan at the end of the project narrative or as a separate page with just one line (to not count against page limit of project narrative).**

We work with EPA and NYSG on a research competition in the Long Island Sound, do we need these forms completed for the EPA funded research?

- **No. You only need to complete this form for Sea Grant funded research.**

Do I need to get these forms from PIs of current development awards that are research focused?

- **No, we are looking to conduct a more comprehensive environmental review for all projects in the future.**

Does the MMPA cover freshwater mammals (e.g. beavers, otters, and similar)?

- **No. The otters protected under the MMPA are the northern sea otter, the southern sea otter, and the marine otter. However, there may be other laws or regulations (e.g. the Endangered Species Act) protecting freshwater mammals that we will consider during the review process. .**