2.1 Project Definition/Classification/Initial Study

2.1.1 Project Definition

The correct and complete definition of all reasonably foreseeable elements of a proposed project is the single most important element of the CEQA compliance process.

Defining the Project

CEQA applies to all “discretionary projects.” The term discretionary refers to situations in which a governmental agency can exercise its judgment in deciding whether and how to approve or carry out a project.

The term project refers to the whole of an action that has the potential, directly or ultimately, to result in a physical change to the environment (CEQA Guidelines Section 15378 http://ceres.ca.gov/topic/env_law/ceqa/guidelines/art20.html). This includes all phases of a project that are reasonably foreseeable, and all related projects that are directly linked to the project.

For the University of California, typical projects that could have a significant effect on the environment include capital construction projects, LRDPs, leases, acquisition of property, substantial changes in the use of facilities, and series of actions such as seismic renovation or asbestos removal. Real estate transactions such as leases and acquisitions of property may be considered projects that could have a significant effect on the environment.

The proposed location for the project is also essential as it is frequently the site of a project that determines the type, intensity and extent of the environmental impacts. There must also be a rational, documented process for site selection among alternative sites.

The Time to Define a Project

Within the University of California, the Project Planning Guide (PPG) (UC CEQA Handbook, Appendix B) is the document that describes the proposed capital improvement project. Project definitions should include a description of the policy objective(s) to be served by the proposed project and a general description of the project itself. The project description should include detail sufficient to ascertain the nature and general magnitude of environmental impacts.

The Facilities Manual (Volume 2 - Planning, Chapter 6 Pre-Design Phase http://www.ucop.edu/facil/fmc/facilman/volume2/ch6.html) describes the elements of project development that precede design. Sections include Site Analysis, Existing Building Analysis (for remodeling), Surveys of Existing Hazardous Materials (Due Diligence), Data Compilation, Facilities Infrastructure Analysis, Programming and Construction Cost. Elements in these sections are helpful to the environmental analysis for a project. Consultation during the project definition phase may enable some potential environmental impacts to be avoided, thereby reducing documentation and mitigation requirements.
Practical Considerations

The way a project is defined directly affects how the proposed action is analyzed for environmental compliance with CEQA, particularly in relation to such issues as primary and secondary effects and alternatives. For these reasons it is advisable to define the project as specifically as possible in terms of purpose, reasonably foreseeable population, development, and proposed uses as early as possible. Furthermore, it is helpful to discuss the use of replacement, released, or reallocated space, if any, in terms of square footage, population, and increased generation of traffic.

Early consultation with the Offices of the President and the General Counsel is strongly recommended for projects that may have significant environmental effects or which may be controversial. Consultation is most efficient if initiated at an informal level before campus decisions regarding the project have been made.

One very useful tool, especially for complex projects, is a project element summary table. A project element summary table describes all the elements of a project in a dated, one-page table format. This table can then be shared with the project manager, environmental consultant, project architects, and others involved with the project. If and when any of these elements change, a revised table can be recirculated to the project team to make all aware of project changes. Changes may have ramifications for the environmental analysis, which would need to be communicated to the project team at the time changes are made.