

Attachment 21A

Explanatory Note for National Aeronautics & Space Administration (NASA) Report November 2, 2009

NASA has a total of 74 NEPA Actions, including 61 Categorical Exclusions (CE) actions, 12 EA actions, and one EIS action in support of all four NASA Programs funded under the American Recovery and Reinvestment Act (ARRA). Although no obligations have been made under Aeronautics, 20 CE actions have been identified. No projects have been identified where NEPA is not applicable, no projects have been withdrawn, and there are no NEPA actions that have remained in pending status through multiple reports.

NASA's attached excel spreadsheet was completed using the following internal NASA explanations and guidelines:

1. Total Obligation is defined as “a binding agreement that will result in outlays, immediately or in the future. Budgetary resources must be available before obligations can be incurred legally. This term includes obligations as well as recoveries of the current and prior year obligations. Recoveries of prior year obligations are reported as budgetary resources in budget execution reporting rather than as obligations” (per the OMB Updated Implementing Guidance for the ARRA of 2009, dated April 3, 2009).
2. Categorical Exclusions (CE) are reported under the same Title/Program and Project/Activity if they are similar in nature. For example, CEs for roof replacements and building repairs at Johnson Space Center due to Hurricane Ike in 2008 are reported under a single Project/Activity entitled “Hurricane Repairs at JSC,” and include nine individual facility repair projects and activities. This same methodology will be used for Environmental Assessments (EAs) and Environmental Impact Statements (EISs). In the case where several CE's are grouped together under the same Project/Activity, the “Date NEPA is Done” will reflect the date the most recent CE was completed.
3. Date of Completion for CEs fall into one of three categories: (1) the date a NASA Record of Environmental Consideration (REC) was signed; (2) The date an environmental checklist was completed for an action not requiring a REC; or (3) the date either the NASA HQ NEPA Program Manager or Center NEPA Manager determined that the project/activity fell under a CE and no REC was required.
4. As of September 30, NASA has identified 14 ARRA-funded projects. Project/Activities may have multiple NEPA actions indicated on the report because multiple tasks are occurring under the same ARRA project/activity. NASA has an Agency work breakdown structure for ARRA funded activities, which defines each project. A project is generally highly complex, and has many activities occurring at multiple NASA sites that contribute to its completion. A project often constitutes a single mission into space which is comprised of multiple subsystems, and consists of multiple tests and development activities. A project may contribute to a single research objective, and hence have multiple experiments and activities associated with it. Activities may occur at

more than one NASA Center and each Center may prepare its own environmental review documentation in support of the project/activity.

As a result, a “project” as defined for Recovery Act budgeting/accounting purposes does not always align with the “project” as defined for NEPA purposes on a one-to-one basis. There is a considerable difference between the number of NEPA actions and the number of Recovery-Act funded projects in this report. Most ARRA-funded projects in this report consist of several individual tasks or activities, each with its own discrete NEPA action. The ARRA-funded project identifies either:

(1) A broad project with several interdependent tasks which would involve one programmatic NEPA analysis, followed by subsequent tiered actions or site specific analyses; or

(2) Multiple component “projects” that have independent utility and are individually analyzed under NEPA.

5. On Page 2 of NASA’s second report spreadsheet, three additional CEs were completed for *Cross Agency Support Activities - Hurricane Repairs at JSC*. Page 1 of the 2nd report indicated that there were 9 ARRA funded projects under the Cross Agency Support Program. NASA has since determined that for clarity and consistency purposes, with other reporting, funds allocation, and the management structure for the ARRA-funded projects/activities, there is only one ARRA project/activity indicated for the Cross Agency Support Program on Page 1 of the report (in the “Number of ARRA Funded Projects/Activities” column). The 9 CE actions are still indicated on Page 2 of the report, and in columns describing NEPA actions on Page 1. This reporting method is applied to all the projects/activities within NASA’s ARRA Programs.

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