

# memorandum

DATE December 15, 1994

From: Office of NEPA Oversight

SUBJECT: Benefits of Site-wide National Environmental Policy Act (NEPA) Review

To Distribution

The purpose of this guidance memorandum is to describe potential benefits of conducting a site-wide NEPA review (environmental impact statement or environmental assessment). I believe that this information will help program and field offices prepare their annual NEPA planning summaries and their overall NEPA compliance strategies. Site-wide reviews can aid the Department of Energy (DOE) in meeting its goals to streamline the NEPA process, to make that process more useful to decision makers and the public, and to reduce the time and cost required to prepare NEPA documents.

## Background on DOE's approach to site-wide NEPA reviews:

The Secretarial Policy on NEPA (June 13, 1994) requires that every three years, starting with the first year, Heads of Field Organizations include in their annual NEPA planning summary an evaluation of whether a site-wide environmental impact statement would facilitate future NEPA compliance efforts. The first annual NEPA planning summaries are due to the Office of Environment, Safety and Health on January 31, 1995.

The DOE NEPA regulations, at 10 CFR 1021.330(c), establish a Departmental policy to prepare site-wide environmental impact statements for certain large, multiple-facility DOE sites to assess the impacts of all or selected functions at those sites. The regulations also state that DOE may prepare site-wide environmental impact statements or environmental assessments for other sites.

The preamble to DOE's final NEPA regulations (57 FR 15128; April 24, 1992) explained the role that DOE expects site-wide reviews to play in DOE's overall NEPA compliance program. A site-wide review would evaluate the potential individual and cumulative environmental impacts of ongoing and reasonably foreseeable activities at a DOE site (including potential mitigation of any environmental impacts). The review would provide an overall NEPA baseline that would be particularly useful for tiering or as a reference when preparing project-specific NEPA reviews for new proposals. Site-wide reviews could be conducted for a number of reasons, such as to improve and coordinate site and agency planning and to maximize cost-savings. Guidance regarding alternatives that should be considered in site-wide NEPA reviews also has been issued. (See memorandum from Assistant Secretary for Environment, Safety and Health to Secretarial Officers and Heads of Field Organizations entitled Recommendations on Alternative Actions for Analysis in Site-wide NEPA Reviews, dated May 26, 1992).

## Potential benefits of site-wide NEPA reviews:

### o Cumulative impacts analysis.

A site-wide review is an efficient way to present cumulative impact information so that the decision makers have a clear understanding of the totality of impacts from past, present and reasonably foreseeable future activities at a site.

### o Efficiency.

A site-wide review provides an efficient NEPA review strategy by assessing multiple proposed projects in one document. When there are a number of proposed actions for a site, each of which would undergo a separate NEPA review in the same time period, a single site-wide NEPA review saves both time and money by consolidating impact analyses and public participation activities and streamlining internal review procedures.

### o Tiering.

A site-wide review lays the foundation for a strong NEPA compliance program and supports future NEPA reviews. The environmental impact information that a site-wide review provides can be incorporated by reference in later NEPA reviews, so that later reviews can be simpler in scope and focus on project-specific issues. A site-wide review, however, needs to be supplemented periodically to retain this usefulness. Supplements, too, are simplified if a solid foundation is provided by the initial site-wide review.

### o Avoiding segmentation.

A site-wide review is one method of avoiding segmentation (division of actions with significant impacts into smaller actions, thereby hiding significance).

### o Land use planning.

A site-wide review facilitates comprehensive and responsible land use planning, consistent with the Secretary's ecosystem-based initiative for land and facility use which is under development. Consideration of the potential impacts of all reasonably foreseeable future activities at a site helps the Department exercise good stewardship of resources entrusted to its care.

### o Public participation.

A site-wide NEPA review supports the Secretary's public participation policies. As DOE plans for changes in its operations in response to mission changes, a site-wide NEPA review invites public participation in DOE's planning (through the environmental impact statement public scoping and comment process, or through public participation opportunities during preparation of an environmental assessment).

### o Addressing stakeholder concerns.

A site-wide review is an effective and efficient means of responding to stakeholder concerns. DOE's stakeholders want information on past, present, and future activities at DOE sites in order to better understand the impacts that DOE's activities have had or may have on their health and environmental quality. The comprehensive nature of a site-wide NEPA review (with its analysis of past, present, and reasonably foreseeable future impacts) would provide the type of information stakeholders are seeking.