DOE F 1325.B
(8-89)
EFG (07-90)

United States Government **Department of Energy**

memorandum

DATE: May 08, 1995

REPLY TO ATTN OF: Office of NEPA Policy and Assistance:Borgstrom:6-4600

SUBJECT: Guidance for Site-wide Environmental Impact Statements

TO:

Henry Garson, NEPA Compliance Officer
Office of Defense Programs

You have raised a concern that several programmatic and site-wide environmental impact statements (EISs) related to the nuclear weapons complex involve potential overlaps in scope. If not addressed appropriately, such overlaps could result in unnecessary cost, delay, and stakeholder concern regarding the Department's decision making process. In addition, given the interrelationships among proposed actions and alternatives in the programmatic and site-wide EISs, it is not clear how to cover reasonably foreseeable cumulative impacts in these documents. This memorandum is in response to your request for guidance on how to address this Issue, particularly with respect to the ongoing Pantex and Nevada Test Site site-wide EISs. Following discussion with you and in consultation with the Office of the General Counsel, I recommend that we pursue the approach outlined below:

1. A site-wide EIS is intended to support decision making at a given geographic location. As a general rule, a site-wide EIS should address environmental impacts that occur as a result of past, present, and reasonably foreseeable future activities at the site. (The consideration of off-site alternatives for storage of weapons components that result from Pantex dismantlement activities in the Pantex Site-wide EIS is an exception to this rule, based on prior Secretarial commitments to stakeholders.)

2. Although the focus of a site-wide EIS is clearly on activities at the site, in some circumstances it is necessary to take into account proposals originating elsewhere that may affect facilities management or land use planning at the site. Such external proposals would be subject to a separate NEPA review and decision making process, but would need to be identified, and in varying degrees assessed, in the site-wide EIS.

3. For a given site, if relocation of some or all of its functions to another site is reasonably foreseeable (e.g., because such relocation is a proposal or a reasonable alternative being evaluated in another EIS), the site-wide EIS would normally address the impacts at the current site of such relocation, but not the impacts anticipated to occur at the remote site; i.e., the site-wide EIS would address the impacts of the loss of the function, but not the impacts that would occur at alternative locations.

4. Conversely, if receiving a new function is a reasonable alternative being evaluated in another EIS, the site-wide EIS would address the impacts of this potential new activity as part of the cumulative impact analysis. If receiving the new function at the site is an actual, specific proposal in another DOE NEPA document, that activity should be included as part of the proposed DOE action in the site-wide EIS as well and would be fully addressed.

5. In the example in 4 above, the site-wide EIS should summarize and incorporate by reference the pertinent material developed for the separate NEPA review of the potential new activity. If information is incomplete or unavailable (e.g., because work on the related EIS is in progress) then the best available information would be used in the site-wide EIS, in accordance with the provisions of 10 *CFR* 1502.22. We do not anticipate that new data would need to be collected nor extensive new analyses performed to prepare the cumulative impact analysis.

For example, the Pantex Site-wide EIS should consider in its cumulative impact analysis the impacts of locating a tritium supply source at Pantex because, at this stage, siting at Pantex is "reasonably foreseeable." Information from the Tritium Supply and Recycling Draft EIS should be summarized and incorporated by reference in the Pantex Site-wide EIS. It should be made clear that a decision on the location of a new tritium supply facility would be supported by the Tritium EIS, not the Pantex EIS. If the scoping process for the Stockpile Stewardship and Management (SS&M) Programmatic EIS determines that the relocation of the assembly/disassembly function is a reasonable alternative for the future weapons complex, the Pantex Site-wide, EIS should address impacts of the potential loss of the assembly/disassembly function at Pantex, to the extent possible. However, the Pantex Site-wide EIS would not address impacts at Nevada (or other alternative sites) of the potential relocation of the assembly/ disassembly function. Since it appears likely that the relocation of the assembly/ disassembly function will be considered in the SS&M Programmatic EIS, we suggest that the Pantex Site-wide EIS include an analysis of this option, as appropriate. Any decision to relocate the assembly/disassembly function would be supported by the SS&M Programmatic EIS, not the Pantex EIS.

In the same vein, the Nevada Site-wide EIS should address in its Cumulative impacts analysis all of the "reasonably foreseeable" future activities that are being contemplated for the Nevada Test Site, limited, of course, by the availability of information. There should be no delay or duplication of effort because the pertinent analyses would be summarized and incorporated by reference from other EISs. Alternately, "best available" information would be used.

Thank you for focussing attention on this important issue. This guidance is somewhat flexible. We, of course, need to apply judgment in each specific case in determining the best approach to use. Close coordination among sites is essential to achieve efficiency and consistency. If you have any questions regarding these recommendations, please call me.

Carol Borgstrom

Carol Borgstrom
Director
Office of NEPA Policy and Assistance

cc: David Rosson, AL
Mary Ellen Giampaoli, NV
William Dennison, GC