

LESSONS LEARNED

December 1, 2000; Issue No. 25

For Fourth Quarter FY 2000

CEQ Fosters Communication Among Federal NEPA Liaisons

The President's Council on Environmental Quality (CEQ) periodically sponsors meetings of senior NEPA representatives from Federal agencies to discuss emerging environmental policy issues and matters concerning NEPA implementation. Carol Borgstrom, Director, Office of NEPA Policy and Compliance, is the NEPA Liaison for DOE Headquarters. On October 11, 2000, she joined 35 representatives from other agencies at the most recent CEQ Federal Agency NEPA Liaisons meeting, in Washington, D.C. [The NEPA Points of Contact link (ceq.eh.doe.gov/nepa/liaisons.cfm) on CEQ's NEPA net lists the NEPA Liaisons.]

In this issue of *Lessons Learned*, we present several matters discussed at the recent CEQ NEPA Liaisons meeting that are of potential interest to the DOE NEPA Community.

- Do you know the EPA regional office staff assigned to review your NEPA documents? You should. The article on page 3 identifies such EPA reviewers.
- Do you list all cooperating agencies on the cover sheets of EISs? CEQ reminds you of the regulatory requirement to do so, and notes that this will aid EPA tracking. See page 4.
- Are you aware that amphibian population declines may indicate an overall worsening of environmental quality? And that NEPA reviews present an opportunity to address the problem? See page 4 for further information.



Horst Greczmiel, CEQ's Associate Director for NEPA Oversight, has invited Carol Borgstrom to discuss DOE's NEPA Lessons Learned Program at the next NEPA Liaisons meeting, scheduled for December 4, 2000. **LL**

DOE NEPA Order Revised, National Nuclear Security Administration Responsibilities Outlined

On October 26, 2000, the Deputy Secretary of Energy issued DOE O 451.1B, National Environmental Policy Act Compliance Program, to accommodate National Nuclear Security Administration (NNSA) NEPA responsibilities. The revised Order has an expanded section on applicability and a new section on NNSA procedures. With respect to an EIS for an NNSA activity, the NNSA Administrator will fulfill the responsibilities of a Secretarial Officer (including consulting with the NNSA General Counsel), and the Secretary or Deputy Secretary will approve an NNSA EIS. The Assistant

Secretary for Environment, Safety and Health, after consulting with the Assistant General Counsel for Environment, will provide recommendations on EIS approval to the Secretary or Deputy Secretary. These NNSA NEPA procedures were developed jointly by the affected Offices and coordinated with NNSA's NEPA Compliance Officers.

The Office of NEPA Policy and Compliance is working with NNSA NEPA Compliance Officers on day-to-day implementation issues.

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Carol Borgstrom

Director
Office of NEPA Policy and Compliance

Be Part of Lessons Learned

We Welcome Your Contributions

We welcome suggestions and contributed drafts for the *Lessons Learned Quarterly Report*. Draft articles for the next issue are requested by February 1, 2001. To propose an article for a future issue, contact Yarden Mansoor at yarden.mansoor@eh.doe.gov or phone 202-586-9326.

First Quarter Questionnaires Due February 1, 2001

Lessons Learned Questionnaires for NEPA documents completed during the first quarter of fiscal year 2001 (October 1 through December 31, 2000) should be submitted by February 1, but preferably as soon as possible after document completion. The Questionnaire is available interactively on the DOE NEPA Web at tis.eh.doe.gov/nepa/ under DOE NEPA Process Information. For Questionnaire issues, contact Vivian Bowie at vivian.bowie@eh.doe.gov or phone 202-586-1771.

Feedback on LLQR

Do you have a comment or a suggestion? Please submit feedback to either of the contacts listed above.

LLQR Online

Current and past issues of the *Lessons Learned Quarterly Report* are available on the DOE NEPA Web at tis.eh.doe.gov/nepa/ under DOE NEPA Process Information.

LLQR Index

A cumulative index of the LLQR is provided in the September issue each year.

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Annual Planning Summaries Due in January Site-Wide EIS Evaluations Required

Members of the DOE NEPA Community are reminded to support the preparation of their organization's Annual NEPA Planning Summary by providing appropriate information to their NEPA Compliance Officers.

DOE Order 451.1B requires each Secretarial Officer and Head of a Field Organization to submit an Annual NEPA Planning Summary to the Assistant Secretary of Environment, Safety and Health (EH-1) by January 31 of each year. The Annual NEPA Planning Summary also must be made available to the public.

Annual planning for NEPA reviews promotes efficient resource management and reduces delays. The Summary is to include:

- (1) The status of ongoing NEPA compliance activities
- (2) Any EAs expected to be prepared in the next 12 months
- (3) Any EISs expected to be prepared in the next 24 months
- (4) The planned cost and schedule for completion of each NEPA review identified, and
- (5) **Every three years starting with 1995 (and therefore, in 2001), an evaluation of whether a site-wide EIS would facilitate future NEPA compliance efforts.**


For further information, contact Jim Daniel at james.daniel@eh.doe.gov, phone 202-586-9760, or fax 202-586-7031. 

Get to Know Your EPA EIS Reviewers

“Have lunch with your EPA reviewer.”

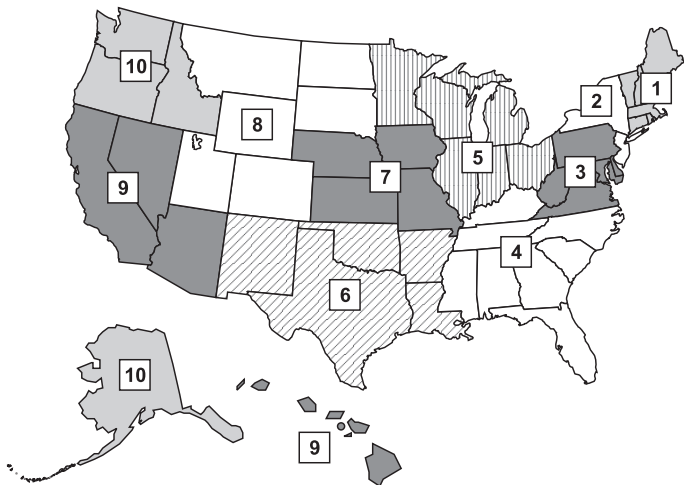
Anne Miller, Acting Director, Office of Federal Activities, U.S. Environmental Protection Agency (EPA), didn’t actually say that. But she did strongly encourage Federal agency field personnel to get to know the EPA NEPA document reviewers in their regions. Speaking at the Council on Environmental Quality’s Federal Agency NEPA Liaisons meeting in October, Ms. Miller urged agency EIS preparers in the field to engage in dialogue about a draft EIS with the EPA regional EIS reviewers before EPA submits comments on the document. Other priorities may limit EPA staff’s ability to get actively involved in every EIS process, she said, but “we like to discuss issues before they become big problems.”

To facilitate early contact with EPA’s EIS reviewers, here is information on reviewers in EPA regional offices that have specialists for energy or radiation issues. This supplements the list of EPA regional points of contact that we present in our *Directory of Potential Stakeholders for Department of Energy Actions under the National Environmental Policy Act* and to whom you send NEPA documents. (We will include both contacts and reviewers in future editions of the Directory.)

We thank Susan Absher, the EPA Headquarters NEPA/DOE point of contact, for her assistance with this article. Please get to know your EPA EIS reviewer. 

EPA Regional NEPA Counterparts		
EPA Region	Regional Points of Contact	DOE Reviewer(s)
1	Elizabeth Higgins 617-918-1051	Tim Timmermann 617-918-1025
2	Robert Hargrove 212-637-3495	Grace Musumeci 212-637-3738
3	John Forren 215-814-2705	None specified – Region receives few DOE documents
4	Heinz Mueller 404-562-9611	None specified
5	Ken Westlake 312-886-2910	Mazin Enwiya 312-353-8414
6	Michael Jansky 214- 665-7451	None specified
7	Joe Cothorn 913-551-7148	None specified
8	Cindy Cody 303-312-6228	Dana Allen (DOE) 303-312-6870 or Richard Graham (radiation) 303-312-7078
9	David Farrel 415-744-1584	David Tomsovic 415-744-1575
10	Richard Parkin 206-553-8574	Chris Gebhardt 206-553-0253

EPA Regions




An EIS Must List Cooperating Agencies on its Cover Sheet

A Council on Environmental Quality (CEQ) memorandum of September 25, 2000, reminds Federal agencies to identify Federal and non-Federal cooperating agencies on the cover sheets of their EISs, as required by the CEQ NEPA regulations (40 CFR 1502.11). The Environmental Protection Agency's Office of Federal Activities, which maintains an EIS database for CEQ, relies on EIS cover sheets for accurate and complete information on cooperating agencies, which will now be included in the database. In an earlier July 28, 1999, memorandum, CEQ urged agencies preparing an EIS to actively solicit the participation of Tribal, state, and local

governments as cooperating agencies (40 CFR 1508.5) (*Lessons Learned Quarterly Report*, September 1999, page 5).

To check the completeness of its own records, the Office of NEPA Policy and Compliance examined EISs that DOE issued beginning in 1995. (See table on next page.)

DOE has issued 24 final EISs that involved cooperating agencies – 16 Federal agencies and their component organizations, eight Tribes, five counties, two states, and one city. Please send information on any additional cooperating agencies for EISs to Yardena Mansoor at yardena.mansoor@eh.doe.gov. 

Amphibian Declines – NEPA Can Help Resolve Problems

Amphibian declines – decreases in populations and increases in physical deformities, both in the United States and worldwide – may signal an overall worsening of environmental quality. A recently issued guide, *Amphibian Declines: An Issue Overview*, discusses the phenomena of amphibian declines, potential causes, and conservation and other mitigation opportunities.

The guide discusses the geographic extent, severity, and consequences of amphibian declines. As it explains, amphibians are a diverse class of cold-blooded vertebrates that includes frogs, toads, salamanders, and caecilians. They inhabit both terrestrial and aquatic habitats. Factors implicated in amphibian declines and deformities include: climate change, habitat loss and fragmentation, introduced species, ultraviolet radiation, contaminants (especially biocides), acid precipitation, pathogens, and unsustainable commercial trade in amphibians.

In suggesting actions to help curb this problem, the guide identifies the NEPA process as an opportunity to analyze impacts on amphibian populations. Possible mitigation actions include habitat protection and enhancement, and regulation of toxic chemicals, invasive species, and ozone-depleting gases. The guide lists useful resources for further information, including organizations, publications, and Web sites.


The guide was issued jointly by the Federal Taskforce on Amphibian Declines and Deformities, Partners in Amphibian and Reptile Conservation, the Declining Amphibian Populations Task Force, and the Amphibian Conservation Alliance. After the Council on



© Jamie K. Reaser

Abnormalities, such as the extra legs on this Pacific treefrog (Hyla regilla), may be occurring more frequently.

Environmental Quality recently recommended this publication to the Federal Agency NEPA Liaisons, the Office of NEPA Policy and Compliance distributed copies to DOE's NEPA Compliance Officers. The author, Jamie K. Reaser, formerly with the U.S. Department of State, now Assistant Director, International Policy and Programs, Department of the Interior, will speak to the Federal NEPA Liaisons at their December 4 meeting on considering amphibian issues during environmental impact analysis.

Visit www.frogweb.gov/tadd/ for more information. *Amphibian Declines: An Issue Overview* is available at this Web site (as a pdf) under Publications. Copies also may be ordered from the Government Printing Office at www.access.gpo.gov/su_docs/sale.html. 

Cooperating Agencies in DOE EISs, 1995 – 2000

Environmental Impact Statement						Cooperating Agencies
	Federal	Tribe	State	County	City	
DOE/EIS-0150: Salt Lake City Area Integrated Projects Electric Power Marketing	✓					Interior (Fish and Wildlife Service, National Park Service, Bureau of Reclamation)
DOE/EIS-0161: Tritium Supply and Recycling	✓					Environmental Protection Agency
DOE/EIS-0169: Yakima Fisheries Project		✓	✓			Yakama Indian Nation; Washington
DOE/EIS-0189: Hanford Tank Waste Remediation System			✓			Washington
DOE/EIS-0197: Delivery of Canadian Entitlement (joint lead with Army Corps of Engineers)	✓					Department of State
DOE/EIS-0203: Programmatic Spent Nuclear Fuel Management and INEL...	✓					Navy
DOE/EIS-0213: Nez Perce Tribal Hatchery Program	✓	✓				Interior (Bureau of Indian Affairs); Nez Perce Tribe
DOE/EIS-0218: Foreign Research Reactor Spent Nuclear Fuel	✓					Department of State
DOE/EIS-0222: Hanford Comprehensive Land-Use Plan	✓	✓		✓	✓	Interior (Bureau of Land Management, Bureau of Reclamation, Fish and Wildlife Service); Nez Perce Tribe, Confederated Tribes of Umatilla Indian Reservation; Benton, Franklin, Grant Counties; City of Richland
DOE/EIS-0225: Pantex Plant and Storage of Nuclear Weapon Components	✓					Army
DOE/EIS-0231: Navajo Transmission Project	✓	✓				Agriculture (Forest Service), Interior (Bureau of Land Management, Fish and Wildlife Service, Bureau of Indian Affairs, National Park Service); Navajo Nation, Hopi Tribe, Hualapai Tribe

Environmental Impact Statement						Cooperating Agencies
	Federal	Tribe	State	County	City	
DOE/EIS-0232: 2004 Power Marketing Program	✓					Interior (Bureau of Reclamation)
DOE/EIS-0236: Stockpile Stewardship and Management	✓					Environmental Protection Agency
DOE/EIS-0238: Continued Operation of Los Alamos National Laboratory Site-wide				✓		Los Alamos County
DOE/EIS-0240: Disposition of Surplus Highly Enriched Uranium	✓					Environmental Protection Agency
DOE/EIS-0241: Hood River Fisheries Project		✓	✓			Confederated Tribes of the Warm Springs Reservation; Oregon
DOE/EIS-0243: Nevada Test Site and Off-site Locations Site-wide	✓			✓		Air Force, Defense Nuclear Agency, Interior (Bureau of Land Management, Fish and Wildlife Service); Nye County
DOE/EIS-0265: BPA Watershed Management Program	✓					Interior (Bureau of Reclamation, Natural Resources Conservation Service)
DOE/EIS-0281: Sandia National Laboratories Site-Wide	✓					Air Force
DOE/EIS-0285: Transmission System Vegetation Management	✓					Agriculture (Forest Service), Interior (Bureau of Land Management)
DOE/EIS-0287: High-Level Waste and Facilities Disposition, Idaho				✓		Idaho
DOE/EIS-0288: Production of Tritium in a Commercial Light Water Reactor	✓					Tennessee Valley Authority
DOE/EIS-0293: Conveyance and Transfer of Certain Land Tracts at Los Alamos National Laboratory	✓	✓		✓		Agriculture (Forest Service), Interior (National Park Service, Bureau of Land Management, Bureau of Indian Affairs); San Ildefonso Pueblo; Los Alamos County
DOE/EIS-0297: Griffith Energy Project	✓					Interior (Bureau of Land Management)

Federal Agencies Adopt Unified Watershed Management Policy

A Unified Federal Policy on watershed management has been adopted by the Departments of Agriculture, Commerce (National Oceanic and Atmospheric Administration), Defense, Energy, and the Interior; the Environmental Protection Agency; the Tennessee Valley Authority; and the Army Corps of Engineers (65 FR 62565; October 18, 2000). Dr. David Michaels, Assistant Secretary of Environment, Safety and Health, signed the policy for DOE.

The policy is “intended to provide a framework to enhance watershed management for the protection of water quality and the health of aquatic ecosystems on Federal lands.” As one of 111 action items in the President’s 1998 *Clean Water Action Plan: Restoring and Protecting America’s Waters*, the policy is part of the administration’s initiative to enhance Federal progress toward achieving the goals of the Clean Water Act. Agencies will implement this policy as individual agency laws, missions, funding, and fiscal and budgeting authorities permit.


The policy has two goals: for Federal agencies to use a watershed approach to prevent and reduce pollution of surface and ground waters resulting from Federal land and resource management activities, and to accomplish this in a unified and cost-effective manner. To accomplish these goals, the signatory agencies will:

- (1) Develop a science-based approach to watershed assessment for Federal lands. Watershed assessment information will become part of the basis of

identifying management opportunities and priorities and for developing alternatives to protect or restore watersheds.

- (2) Use a watershed management approach when protecting and restoring watersheds.
- (3) Improve their compliance with water quality requirements under the Clean Water Act.
- (4) Enhance collaboration in general: improve cooperation among Federal agencies and with States, Tribes, and local governments; expand opportunities for stakeholder participation and for dialogue with private landowners; and coordinate monitoring and share training, information, and technical expertise.

In responding to public comments concerning NEPA review for the policy, the preamble states that the policy is a broad statement that speaks to general concepts and principles, does not establish or alter existing agency programs, and is not defined to the point that it can be meaningfully analyzed. The agencies will fully comply with NEPA and other applicable laws at the appropriate time, such as when the policy is used to develop proposals for specific policies, programs, or projects.

The policy and related information, including the 1998 Clean Water Action Plan, are available at www.cleanwater.gov/. For more information on DOE’s partnership in the Unified Federal Policy, contact Colleen Ostrowski, Office of Environmental Policy and Guidance, at colleen.ostrowski@eh.doe.gov or phone 202-586-4997. 


Advisory Council on Historic Preservation To Issue Revised Regulations for Section 106

The Advisory Council on Historic Preservation on November 17, 2000, voted to adopt revised regulations governing Section 106 of the National Historic Preservation Act (16 USC 470f). The Council expects to publish the revised regulations and accompanying preamble in the *Federal Register* in early December, and the regulations would become effective 30 days later. Until then, the current Section 106 regulations, “Protection of Historic Properties” (36 CFR Part 800, effective June 17, 1999), remain in effect. (See *Lessons Learned Quarterly Report*, June 1999, page 3.)

The revised regulations result from a rulemaking process in which the Council republished its current regulations as a proposed rule for public comment (ending in August

2000). The Council states that, while the revised regulations incorporate changes responding to public comments, the core Section 106 review process is maintained, and the Council does not anticipate any serious problems in a transition from the current regulations to the newly revised regulations.

Facing litigation that might invalidate its 1999 rulemaking, the Council had proposed (65 FR 55928; September 15, 2000) to suspend its current regulations and adopt them as guidelines. Commentors overwhelmingly advised against suspension, however, and in response, the Council has withdrawn its proposal.

Check the Council Web site (www.achp.gov/news.html) in early December for more information. 

An e-NEPA Reminder: Accurate Electronic Files Are Essential for Web Publication

By: Denise Freeman, Acting NEPA Webmaster, *Office of NEPA Policy and Compliance*

Electronic files of NEPA documents published on the DOE NEPA Web must be complete and accurate. For this reason, we ask a NEPA Document Manager or NEPA Compliance Officer who submits a file for Web publication to complete a DOE NEPA Document Certification and Transmittal Form (available on the DOE NEPA Web at tis.eh.doe.gov/nepa/ under DOE NEPA Tools). The signed certification form tells us that a quality control review of the electronic file has been performed and the file is a true copy of the approved NEPA document. (See *Lessons Learned Quarterly Report*, June 2000, page 11, for additional information concerning Web publication, including timing recommendations and electronic file submittal procedures.)

Unintentional Conversion of “ μg ” to “mg” in Web-published EIS Causes Public Concern

The importance of ensuring the accuracy of electronic files for Web publishing was highlighted recently when a reader questioned the beryllium exposure data presented in the Web-published version of the EIS for Continued Operation of the Lawrence Livermore National Laboratory (LLNL) and the Sandia National Laboratories (DOE/EIS-0157; August 1992). The reader, a former LLNL employee concerned about potential past exposure to beryllium, became alarmed because the beryllium exposure data in the on-line EIS indicated exposure to beryllium at far greater levels than the Bay Area Quality Management District Regulation’s governing standard of 10^{-5} micrograms/cubic meter ($\mu\text{g}/\text{m}^3$).

Upon investigation, however, the Web-published version of the EIS was found to be wrong; when a paper copy of the EIS was scanned and saved electronically, some of the correct “microgram” units were converted into incorrect “milligram” units – that is, the scanner misread “ μg ” as “mg.” A representative from DOE’s Office of Environment, Safety and Health contacted the former worker and provided the correct information.

This EIS was among the first documents to be Web-published and technology has since improved, but this


incident reminds us of the need to be sure that our NEPA documents are accurate – for both Web publishing and in general. The electronic files for the LLNL EIS are being corrected. In the interim, we have added notes to the Web files for this EIS alerting users to the incorrect characters.

Quality Control Measures

The need to publish information on-line promptly and resource limitations may make it difficult to perform the thorough proofreading necessary to ensure character-for-character correspondence between an electronic document and the paper copy. A good way to ensure 100% accuracy is to verify that the electronic file submitted for Web publication is identical to the file used to print the document, and then compare the electronic file to a printed copy.

Recommendations

- ✓ Follow EH’s *Electronic Publishing Standards and Guidelines* (Version 6, February 2000), available at tis.eh.doe.gov/nepa under DOE NEPA Tools.
- ✓ Coordinate early with the DOE NEPA Webmaster on technical and timing requirements.
- ✓ Convert the document files into a Web-ready electronic format, such as portable document format (pdf) or hypertext markup language (html).
- ✓ Compare the electronic file version closely against an authentic paper copy. This is particularly important for graphics, documents translated from one word processing software program to another, and any scanned pages.
- ✓ Make sure the e-files are complete (e.g., not missing a volume).

When submitting an electronic file for Web publication, provide a completed DOE NEPA Document Certification and Transmittal Form to Denise Freeman, Office of NEPA Policy and Compliance. She may be contacted at denise.freeman@eh.doe.gov or phone 202-586-7879. 

Use QCPTEEA to Reduce Abbreviations

The Draft EIS for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain (DOE/EIS-0250; July 1999) commendably uses only 15 abbreviations – a list short enough to be presented on the inside cover. Typically, however, DOE NEPA documents contain far too many abbreviations.


Abbreviations, as shortened forms of longer and often complex terms, names, and phrases, can help both writer and reader. Reader-friendliness suffers, however, when a reader must deal with many unfamiliar abbreviations – and even those that are commonly understood within DOE may be unfamiliar to general readers. Using few abbreviations helps make documents more comprehensible to decision makers and the public.

Recommendations

- ✓ Consider whether an abbreviation is appropriate, weighing whether it is better to be concise or more complete and explicit.
- ✓ In DOE NEPA documents, it is usually appropriate to abbreviate NEPA terms (NEPA, EIS), the subject site or facility name (LANL for Los Alamos National


Laboratory, WIPP for Waste Isolation Pilot Plant), or an important component of the proposed action (HLW for high-level waste).

- ✓ Do not abbreviate a term or phrase that will appear infrequently; such an abbreviation is unnecessary and the reader will forget its meaning.
- ✓ If an abbreviation is useful (for example, because a long name or phrase is prevalent throughout the document), define it the first time it appears in each chapter.
- ✓ A shortened phrase or word can be used in place of an abbreviation. After introducing a phrase like Quality Control Process to Eliminate Excessive Abbreviations, instead of QCPTEEA, use “abbreviation elimination process,” or even “Process.”

Additional guidance is available at many Web sites. See the Plain Language Action Network at www.plainlanguage.gov/library/abbreviation.htm, for example, or the Good Grammar, Good Style™ Archive at www.protrainco.com/info/grammar-archives.htm (under the Articles menu, select “How to Get Rid of Acronyms”). 

NEPA Mini-guidance Collection Available


The Office of NEPA Policy and Compliance has issued a collection of mini-guidance articles compiled from the *Lessons Learned Quarterly Report* from December 1994 to September 2000. These articles, developed by the NEPA Office in consultation with the Office of General Counsel and others, contain procedural interpretations and recommendations on a variety of NEPA-related topics. A draft version of this collection was distributed at the May 2000 NEPA Compliance Officers Meeting.

“Mini-guidance Articles from *Lessons Learned Quarterly Reports*” will be mailed to members of the DOE NEPA Community and will be available in electronic format on the DOE NEPA Web at tis.eh.doe.gov/nepa/ under DOE NEPA Tools. Paper copies will be available upon request from the Office of NEPA Policy and Compliance. For more information, contact Yardena Mansoor at yardena.mansoor@eh.doe.gov. 

Reminder: Use the *Glossary of Terms*

In reviewing recent DOE EISs, the Office of NEPA Policy and Compliance has noticed that some glossaries have “reinvented the wheel.” They contain newly composed – and sometimes rather peculiar – definitions of technical and regulatory terms that DOE commonly uses in its NEPA documents.


Technical and regulatory terms used in NEPA documents should be defined to aid readers’ understanding, of course. To foster efficiency and consistency in the preparation of DOE NEPA documents, the DOE NEPA Office prepared a *Glossary of Terms Used in DOE NEPA Documents* (Office of Environment, Safety and Health, September 1998). It provides authoritative definitions for a glossary or related explanatory material, such as text-box explanations of technical concepts. Document preparers sometimes may need to thoughtfully modify the definitions in the glossary to adequately describe how a term is used in a particular document. Wholesale reinvention of definitions is unwarranted and wasteful, however.

The *Glossary* is available on the DOE NEPA Web (tis.eh.doe.gov/nepa/) under DOE NEPA Tools or in booklet form from the Office of NEPA Policy and Compliance. Please address requests and suggestions for additions or further improvements to Denise Freeman at denise.freeman@eh.doe.gov. 

NAEP Award Nominations Are Due March 15

The deadline for submitting nominations for the National Association of Environmental Professionals (NAEP) Environmental Excellence Awards is March 15, 2001. For the past four years, this organization has recognized projects and programs that serve as models of excellence in environmental professional practice. Awards are given in a range of categories. Both government and private organizations are eligible to nominate their projects. In June 2000, DOE received three Environmental Excellence Awards, including one for its NEPA Lessons Learned Program (*Lessons Learned Quarterly Report*, September 2000, page 3).

NAEP is a nonprofit professional association with about 5,000 members, many of whom are NEPA practitioners. The association publishes a peer-reviewed journal, *Environmental Practice*, and sponsors an annual conference that typically includes a substantial NEPA component. (See the cumulative index in *Lessons Learned Quarterly Report*, September 2000, for previous NAEP articles.)

The 2001 NAEP conference, “Environmental Policy and Process: New Directions or Staying on Course?” will be held June 24 to 28 in Arlington, Virginia. For the award nomination form, more information on the 2001 conference, and additional information about NAEP, visit the NAEP Web site at www.naep.org. 

NEPA Order Revised (continued from page 1)

The revised DOE NEPA Order is available on the DOE Directives Home Page (peak.lanl.gov:1776/htmls/directives.html) under DOE Current Directives, and on the DOE NEPA Web, tis.eh.doe.gov/nepa/, under DOE NEPA Tools.

For more information on NNSA NEPA activities, contact a NNSA NEPA Compliance Officer:

Defense Programs

Henry Garson
henry.garson@ns.doe.gov
301-903-0470


Jay Rose
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Materials Disposition

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202-586-0750

Nonproliferation and National Security

Richard Speidel
richard.speidel@hq.doe.gov
202-586-5009

For general matters relating to the DOE NEPA Order, contact Yardena Mansoor, Office of NEPA Policy and Compliance, at yardena.mansoor@eh.doe.gov or phone 202-586-9326. 

NEPA Contracts: Measuring Performance Quality – Or, What Have You Done for Me Lately?

By: Dawn Knepper, Contracting Officer, Albuquerque Operations Office

Services can be ambiguous to define – and even more difficult to measure. How do you know if you are getting the quality of service you think your project requires? How can your answer help others who need similar services? These questions are not as daunting as they may seem. There is a simple answer.

Service quality is best measured by customer satisfaction. When you issue a task under the DOE-wide NEPA contracts, you know if you are happy with the work you receive. As NEPA Document Manager, you know if the resulting NEPA document meets the program needs or not. You certainly know if the contractor performance has made your work easier, faster, and better. When reduced to these terms, measuring service quality is suddenly easier, isn't it?

But it isn't enough for you to know if you are pleased with the quality of the NEPA work provided. You have to tell other NEPA Document Managers and the performing contractor what you think. Keeping knowledge like this to yourself is robbing other document managers of important information and inhibits the contractors in improving their performance. Sharing what you know not only is easy – it is essential.


**Sharing
what you
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only is
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essential.**

The DOE-wide NEPA contracts require NEPA Document Managers to rate contractor performance using the DOE NEPA Contractor Performance Evaluation Form. This evaluation also is required by the DOE NEPA Order and by the procurement regulations at FAR 42.15. You can fulfill all three of these requirements by filling out one simple form. Detailed procedures and the evaluation form are in Section 7 of DOE's *National Environmental Policy Act Contracting Reform Guidance* (December 1996), available in the DOE NEPA Compliance Guide and on the

DOE NEPA Web at tis.eh.doe.gov/nepa/ under DOE NEPA Tools. Check the blocks, add a sentence or two where you see fit, and you have met three requirements in one swell foop (oops, fell swoop). It takes only a few minutes.

Do you like the work you have been getting from the DOE-wide NEPA contractors? Do you hate the work you have been getting? You can help other NEPA Document Managers by documenting your opinion. Past performance information should be considered in assigning new task orders. Also, the contractors may use these forms to support their bids for future work from DOE and other agencies.¹

We can measure how well you like using the DOE-wide NEPA contracts by knowing that 17 offices have issued 65 tasks for more than \$40 million, in an average time of only 24 days. We hear new users exclaim how easy the contract is to use and how happy they are with the process. But to best help us plan the next acquisition for DOE-wide NEPA contracts, we also need to demonstrate the quality of performance under the contracts. **We need you** to protect this useful vehicle by completing your performance evaluation.

For additional information, contact Dawn Knepper at dknepper@doeal.gov or phone 505-845-6215, or Yardena Mansoor at yardena.mansoor@doe.eh.gov or phone 202-586-9326. Also see Lessons Learned Quarterly Reports, March 1996, page 7, and June 1996, page 5. 

¹ Completed evaluations are source selection information and will be released only to government personnel and the contractor whose performance is being evaluated, per FAR 42.1503. Past performance information is shared with other government agencies when requested to support future award decisions for a period of three years after completion of contract performance.

DOE-Wide NEPA Contracts Update

The following tasks have been awarded recently under the DOE-wide contracts. For previously reported tasks, see “Contracting, NEPA” in the *Lessons Learned Quarterly Report Cumulative Index* in the September 2000 issue. For questions or comments on the DOE-wide NEPA contracts, contact David Gallegos at dgallegos@doeal.gov or phone 505-845-5849.

Task Description	DOE Contact	Date Awarded	Contract Team
EA for Restoration of Energy Technology Engineering Center Site	Donna Sutherland 510-637-1563 donna.sutherland@oak.doe.gov	8/31/00	Battelle
EA for Facilities Revitalization Project at Oak Ridge National Laboratory	Mark Belvin 865-576-7321 belvinwm@ornl.gov	9/26/00	Tetra Tech, Inc.
EA for US Enrichment Corp. Centrifuge, East Tennessee Technology Park	Phil Stumbo 865-576-1828 stumbopi@oro.doe.gov	9/28/00	Tetra Tech, Inc.
EA for Alternative Energy Generation Facility at Nevada Test Site	Kevin Thornton 702-295-1541 thornton@nv.doe.gov	10/16/00	Battelle
EIS for Proposed Relocation of LANL TA-18 Missions	Jay Rose 202-586-5484 james.rose@ns.doe.gov	12/1/00	SAIC

Transitions

Mary Greene Leaves NEPA Office

Mary Greene, who served in DOE’s Office of NEPA Policy and Compliance since 1994, has taken a position as Chief of the Hazardous Waste Disposal Section at the Drug Enforcement Administration (Department of Justice) in Arlington, Virginia. She will manage the program that ensures that hazardous wastes from illegal drug operations are cleaned up in compliance with all applicable requirements.

While at DOE, Ms. Greene worked with the Environmental Management Program on its EISs for the Rocky Flats and Oak Ridge sites and with Defense Programs on its Site-wide EIS for Sandia National Laboratories. She also provided leadership for the Office of Environment’s April 2000 guidance on “Clean Air Act Conformity Requirements and the National Environmental Policy Act Process.”


Mary wishes to thank all the people that she has worked with during the last six years, especially the Program and Field NEPA advocates and the many contractors who provided NEPA-related assistance. She can be reached at 202-353-9644. The Office of NEPA Policy and Compliance thanks Mary for her excellent contributions to the Department’s NEPA compliance program and wishes her well in her new position.

Welcome to Carl Sykes

The Office of NEPA Policy and Compliance welcomes Carl Sykes to its ranks. He joins us from the Los Alamos Area Office, where he worked with the NEPA Compliance Officer and later as the DOE Facility Representative at the Los Alamos Neutron Science Center. Previously, he worked for nine years at the Rocky Flats Field Office, where he contributed to the development and review of several NEPA documents involving nuclear projects at the site, among other assignments.

Carl Sykes joins the Science/Nuclear Unit of the NEPA Office. He can be reached at carl.sykes@eh.doe.gov or phone 202-586-9924.

Darlene Low: New NCO at Southwestern Power

Darlene Low now serves as the NEPA Compliance Officer for the Southwestern Power Administration, replacing Gary Bridges. Ms. Low has been with Southwestern since 1989. In addition to serving as NCO and as Special Assistant for Environment, Safety, and Health, she is also responsible for Southwestern’s occupational safety and health programs. Prior to Southwestern, she worked for the Alaska Power Administration, the Veterans Administration, and the U.S. Fish and Wildlife Service. She can be reached at low@swpa.gov or phone 918-595-6750. 



DOE Litigation Update

DOE Sued on Paducah Experimental Cleanup Technology – Injunction Denied on CERCLA Grounds; Related Lawsuit Partially Settled

In September 2000, the Regional Association of Concerned Environmentalists (RACE) and two individuals sued DOE in the U.S. District Court for the Western District of Kentucky. The complaint alleged that DOE violated NEPA by failing to prepare an EA or an EIS for the implementation of the Permeable Treatment Zone project at the Paducah Gaseous Diffusion Plant. RACE is an environmental organization whose members live in and around Paducah.

The proposed project, part of DOE's Innovative Technology Remedial Demonstration Program at Paducah, is an experimental technology intended to treat contaminated groundwater and help prevent migration by injecting a permeable "wall" of treatment material into the ground at depths up to 120 feet. Contaminated groundwater flows through and reacts with, or is absorbed by, the treatment material.

Arguing that the experimental technology has never been used on radioactively contaminated groundwater, nor at these depths, the plaintiffs claim that potential problems could occur with the use of the technology that could cause further contamination of the groundwater or discharge into the Ohio River or aquifers.

The plaintiffs' NEPA claim asserts that this proposal has never been subject to a hard look at the impacts of the action or at reasonable alternatives. They sought an injunction to prevent DOE from implementing its proposal before completion of an EA or EIS. On October 24, 2000, the judge denied the plaintiffs' request for injunction, on the grounds that Section 113(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) bars legal challenges to a removal action under CERCLA until the action is completed.

In a lawsuit filed earlier by the same plaintiffs (*Lessons Learned Quarterly Report*, June 2000, page 18) regarding DOE's proposed Vortec demonstration project at Paducah, the judge issued an order on November 22, 2000, that settles one of the plaintiffs' claims. In the settlement, DOE agrees not to conduct thermal waste treatment at the Vortec facility for at least one year, and correspondingly to issue a revised Finding of No Significant Impact for the Vortec project. Further, DOE would provide at least 30 days notice to the plaintiffs and further NEPA review, including a public comment opportunity, for any subsequent proposal to use Vortec for thermal treatment. Litigation will continue on the remaining issue in the lawsuit, that is, whether DOE must prepare a site-wide EIS for the Paducah site. **LL**

Training Opportunities

NEPA-related courses are listed in the Lessons Learned Quarterly Report for information only, without endorsement.

- **Environmental Laws and Regulations**
Las Vegas, NV: December 13, 2000
Fee: \$545

An Overview of Environmental Laws and Regulations for Citizens Advisory Boards
Albuquerque, NM: January 30, 2001
Fee: \$335

An Overview of Environmental Laws and Regulations for Managers
Oklahoma City, OK: February 1, 2001
Las Vegas, NV: February 13, 2001
Fee: \$335

Communicating with the Public
Paducah, KY: February 27, 2001
Fee: \$TBD

*USDA Graduate School/
DOE National Environmental Training Office (NETO)*
Phone: 803-725-0818
E-mail: NETO@srs.gov
Internet: www.em.doe.gov/neto/
- **Advanced Topics in Environmental Impact Assessment**
Dallas, TX: February 21 to 23, 2001
Fee: \$695

*Environmental Impact Training
Dr. Larry Canter, University of Oklahoma*
Phone: 830-596-8804
E-mail: info@eiatraining.com
Internet: www.eiatraining.com
- **Environmental Law**
Washington, DC: February 7 to 9, 2001
Fee: \$795

ALI-ABA/National Trust for Historic Preservation
Phone: 800-253-6397
E-mail: phunt@ali-aba.org
Internet: www.ali-aba.org
- **Making the NEPA Process More Efficient: Scoping and Public Participation**
Durham, NC: January 10 to 12, 2001
Fee: \$640

Socioeconomic Impact Analysis Under NEPA
Durham, NC: February 6 to 8, 2001
Fee: \$640

*Nicholas School of the Environment
Duke University*
Phone: 919-613-8082
E-mail: britt@duke.edu
Internet: www.env.duke.edu/
- **Clear Writing for NEPA Specialists**
Boise, ID: December 5 to 7, 2000
Anchorage, AK: March 6 to 8, 2001
Fee: \$795

How to Manage the NEPA Process and Write Effective NEPA Documents
Annapolis, MD: January 9 to 12, 2001
Fee: \$995

How to Manage the Environmental Impact Analysis Process
Orlando, FL: February 6 to 9, 2001
Fee: \$995

Overview of the NEPA Process
Phoenix, AZ: February 27, 2001
Fee: \$195

Reviewing NEPA Documents
Phoenix, AZ: February 28 to March 2, 2001
Fee: \$795

The Shipley Group
Phone: 888-270-2157 or 801-298-7800
E-mail: ben@shipleygroup.com
Internet: www.shipleygroup.com
- **Risk Analysis for Chemicals and Radionuclides: A Review of the State-of-the-Art**
Kiawah Island, SC: March 5 to 9, 2001
Fee: \$1,295 (government employees)
\$1,195 (through January 31, 2001)

Risk Assessment Corporation
Phone: 312-372-1255
E-mail: capsLtd@mcs.com
Internet: www.racteam.com

EAs and EISs Completed (July 1 – September 30, 2000)

EAs

Albuquerque Operations Office/Defense Programs – National Nuclear Security Administration

DOE/EA-1247 (3/9/00)¹

Electrical Power Systems Upgrade Project at Los Alamos National Laboratory, NM

Cost: \$250,000

Time: 26 months

Bonneville Power Administration

DOE/EA-1328 (65 FR 51817; 8/15/00)

Tanner Electric Transmission Line Project, North Bend, WA

Cost: \$70,000

Time: 9 months

Los Alamos Area Office/Defense Programs – National Nuclear Security Administration

DOE/EA-1329 (8/10/00)

Wildfire Prevention Projects, Los Alamos National Laboratory, Los Alamos, NM

Cost: \$150,000

Time: 9 months

National Energy Technology Laboratory/Fossil Energy

DOE/EA-1331 (7/31/00)

Remediation of Subsurface and Groundwater Contamination at the Rock Springs In Situ Oil Shale Retort Site, Sweetwater, WY

Cost: \$44,000

Time: 7 months

Oak Ridge Operations Office/Environmental Management

DOE/EA-1324 (7/10/00)

Sale of Zinc Bromide for Reuse, Oak Ridge National Laboratory, Oak Ridge, TN

Cost: \$40,000

Time: 9 months

EISs

Bonneville Power Administration

DOE/EIS-0285 (65 FR 39146; 6/23/00)²

(EPA Rating: EC-1)

Transmission System Vegetation Management Program for CA, ID, MT, OR, UT, WA, WY

Cost: \$317,000

Time: 35 months

Nuclear Energy, Science and Technology

DOE/EIS-0306 (65 FR 47988; 8/4/00)

(EPA Rating: EC-2)

Treatment and Management of Sodium-Bonded Spent Nuclear Fuel, Idaho National Engineering and Environmental Laboratory, ID, and the Savannah River Site, SC

Cost: \$2,600,000

Time: 18 months

ENVIRONMENTAL PROTECTION AGENCY (EPA) RATING DEFINITIONS

Environmental Impact of the Action

LO – Lack of Objections

EC – Environmental Concerns

EO – Environmental Objections

EU – Environmentally Unsatisfactory

Adequacy of the EIS

Category 1 – Adequate

Category 2 – Insufficient Information

Category 3 – Inadequate

(See the March 1997 *Lessons Learned Quarterly Report* for a full explanation of these definitions.)

¹ Not previously reported in Lessons Learned.

² Cost not previously reported.

NEPA Document Costs and Completion Times

Costs

EISs

- The costs of the two EISs reported in this quarter were \$317,000 (completed last quarter) and \$2,600,000.
- Cumulatively, for the 12 months that ended in September 30, 2000, the median cost for the preparation of 8 EISs was \$1.8 million; the average cost was \$3.8 million.

EAs

- For this quarter, the median cost of four EAs was \$57,000; the average cost was \$76,000.
- Cumulatively, for the 12 months that ended September 30, 2000, the median cost for the preparation of 20 EAs was \$70,000; the average cost was \$98,000.

Completion Times

EISs

- The completion time for the EIS completed this quarter was 18 months.
- Cumulatively, for the 12 months that ended September 30, 2000, the median completion time for the preparation of 8 EISs was 29 months; the average was 27 months.

EAs

- For this quarter, the median completion time of four EAs was 9 months; the average was 8 months.
- Cumulatively, for the 12 months that ended September 30, 2000, the median completion time for the preparation of 20 EAs was 9 months; the average was 14 months.

Recent EIS-related Milestones

(September 1 – November 30, 2000)

Notice of Intent

Western Area Power Administration
DOE/EIS-0322
Proposed Sundance Energy Project, Coolidge, AZ
8/22/00 (65 FR 53289; 9/1/00)

Draft EIS

Environmental Management
DOE/EIS-0303
Savannah River Site, High-Level Waste Tank Closure, Aiken, SC
November 2000 (65 FR 70568; 11/24/00)

Record of Decision

Nuclear Energy, Science and Technology
DOE/EIS-0306
Treatment and Management of Sodium-Bonded Spent Nuclear Fuel
9/11/00 (65 FR 56565; 9/19/00)

Special Environmental Analysis

National Nuclear Security Administration / Defense Programs
SEA-003
Special Environmental Analysis for Emergency Actions Taken in Response to the Cerro Grande Fire at Los Alamos National Laboratory, Los Alamos, NM
September 2000 (65 FR 60925; 10/13/00)

Supplement Analyses

Bonneville Power Administration
Wildlife Mitigation Program (DOE/EIS-0246)
DOE/EIS-0246/SA-11
Shoshone-Bannock Mitigation Acquisition (Rudeen Ranch Property)
(Decision: No further NEPA review required)
August 2000¹

Nez-Perce Tribal Hatchery Program (DOE/EIS-0213)
DOE/EIS-0213-SA-01
Nez Perce Tribal Hatchery Project – Modifications to Original Proposal
(Decision: No further NEPA review required)
June 2000¹

¹ Not previously reported in Lessons Learned.

What Worked and Didn't Work in the NEPA Process

To foster continuing improvement in the Department's NEPA Compliance Program, DOE Order 451.1B requires the Office of NEPA Policy and Compliance to solicit comments on lessons learned in the process of completing NEPA documents and distribute quarterly reports. This Quarterly Report covers documents completed between July 1 and September 30, 2000. Comments and lessons learned on the following topics were submitted by questionnaire respondents.

The material presented here reflects the personal views of individual questionnaire respondents, which (appropriately) may be inconsistent. Unless indicated otherwise, views reported herein should not be interpreted as recommendations from the Office of Environment, Safety and Health.

Scoping and Public Participation

What Worked

- *Early scoping.* Early scoping helped shape a downsized program and helped program managers recognize that environmental impacts needed to be fully explored to have an effective program.
- *Individual discussions with interested parties.* One-on-one discussions with affected landowners and government agency representatives helped DOE develop the alternatives.
- *Inviting public comments via the Internet.* E-mail and Web site options facilitated commenting on the EIS and made it easier to analyze comments.
- *Active use of public input.* Public comments were used to help define the program, plan site-specific projects, and devise mitigation measures.

What Didn't Work

- *Lack of interest.* The public did not participate to any significant degree in the process, in spite of letters sent out, newspaper and radio ads, and public meetings.

Data Collection/Analysis

What Didn't Work

- *Lack of specific technical skills.* It was difficult to find staff or contractors capable of analyzing herbicide impacts.

Document Completion

What Worked

- *Congressional commitments.* Commitments to Congress kept schedules from lengthening and gave a push to get the EIS completed.

What Didn't Work

- *Late internal review comments.* Reviewers who provided significant comments during the final review caused problems in completing the document by the scheduled date.
- *Unexpected reductions in funding.* The expected budget for the program was reduced by half, forcing the scope and schedule of the EA to be revisited several times.
- *Determining the preferred alternative.* There were delays in determining a preferred alternative and having it approved by the Secretary.

Teamwork

What Worked

- *A stable Advisory and Review Team.* A project Advisory and Review Team with representatives from General Counsel; Environment, Safety and Health; and program and field offices had stable membership, which was a big plus.
- *A NEPA Document Manager from the project.* The Document Manager was directly involved in the program and had control of project and EA contractor funds.
- *Meetings in person.* Meeting in person, rather than communicating only by e-mail and telephone, facilitated comment resolution.
- *Providing enough time.* Giving contractors and others on the project team sufficient time to complete their work facilitated teamwork.

What Worked and Didn't Work (continued)

Agency Planning and Decision Making

What Worked

- *Scoping the program.* The NEPA process greatly assisted managers in the overall scoping and site selection for the program.
- *Identifying the best alternative.* The EA process was used to identify the best overall alternative, which was selected as the proposed action alternative.

What Didn't Work

- *Decision making based on fear.* The decision on the alternative selected in this EA process was based on local politics and fear.

Enhancement/Protection of the Environment

- *EA as a planning tool.* The environment will be protected as a result of the planning facilitated by the EA and by the bounding of research and operational conditions described in the EA.

Guidance Needs Identified

- There is a need for guidance concerning the Administrative Record for EAs.
- Guidance on the contents of distribution letters might have prevented the frustration of writing several versions.

Effectiveness of the NEPA Process

For the purposes of this section, “effective” means that the NEPA process was rated 3, 4, or 5 on a scale of 0 to 5, with 0 meaning “not effective at all” and 5 meaning “highly effective” with respect to its influence on decision making.

- For this quarter, in which there were four EAs and one EIS, one of four respondents rated the NEPA process as “effective.”
- One respondent who rated the process as “1” explained that “the NEPA process didn’t necessarily facilitate informed and sound decision making, but it did add credence to the decision.”
- A respondent who rated the process as “4” explained that public input during the NEPA process helped refine the alternatives and added mitigation measures.

EIS Cohort Update

The Office of NEPA Policy and Compliance examines trends in NEPA document costs and completion times by tracking sets of EISs (“cohorts”). In the June 1997 issue of *Lessons Learned Quarterly Report*, we began tracking cost and completion time data for a set of 23 EISs started after July 1, 1994 (“Cohort 94”). We reported the results for Cohort 94 in the June 1999 issue: the median completion time of Cohort 94 was 21 months overall, 22 months for programmatic and site-wide EISs, and 19 months for project-specific documents.

Also in the June 1997 issue, we began tracking “Cohort 97” – a set of 21 EISs started between April 1, 1997, and March 31, 1999. (DOE started

26 EISs within this time frame, but five EISs have been cancelled or withdrawn.) As of November 2000, 12 EISs in Cohort 97 have been completed. Table 1 provides a snapshot of the status of Cohort 97 EISs for each cognizant DOE program office, and Table 2 summarizes cost and time data for the completed EISs.

The median completion time of the 12 Cohort 97 EISs completed to date is 18 months, including 33 months for programmatic and site-wide documents, and 18 months for project-specific documents. Based on the results so far, the median completion time for all Cohort 97 EISs will be between 21 and 31 months. We will continue to track this cohort and report on it from time to time.

Table 1. EIS Cohort by Program Office (EISs Started between 4/1/97 and 3/31/99)

Program	Number in Cohort	Programmatic/ Site-wide	Project-specific	Number Completed through 12/1/00 (Completion Times)
Total	21	3	18	12
Bonneville Power Administration	1	1	0	1 (35 months)
Defense Programs/NNSA	5	2	3	3 (13, 18, and 29 months)
Environmental Management	6	0	6	2 (14 and 17 months)
Fossil Energy	4	0	4	1 (31 months)
Fissile Materials Disposition/NNSA	1	0	1	1 (29 months)
Nuclear Energy, Science and Technology	1	0	1	1 (18 months)
Office of Science	1	0	1	1 (21 months)
Western Area Power Administration	2	0	2	2 (12 and 14 months)

Table 2. EIS Cohort Cost and Time Results for Completed Documents*

EIS Type	Number Completed	Completion Times (months)			Costs (\$M)		
		Median	Average	Range	Median	Average	Range
Total	12 (of 21)	18	21	12 to 36	2.1	3.7	0.3 to 12.2
Programmatic or Site-wide	2 (of 3)	33	33	29 to 36	5.2	5.2	0.3 to 10.1
Project-specific	10 (of 18)	18	19	12 to 31	2.1	3.3	0.5 to 12.2

* These data should be interpreted cautiously because the costs and completion times for the entire cohort may differ substantially from the data shown here. For example, the median completion time for the entire cohort will be between 21 and 31 months.