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ENVIRONMENTAL IMPACT STATEMENT SUMMARY

September 1998

U.S. Department of Energy
Environment, Safety and Health
Office of NEPA Policy and Assistance

DOE F 1325.8
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E.G. (07-90)

United States Government **Department of Energy**

memorandum

DATE: September 29, 1998

REPLY TO ATTN OF: Office of NEPA Policy and Assistance:Mansoor (202-586-9326)

SUBJECT: Guidance on an Environmental Impact Statement Summary

TO: Secretarial Officers and Heads of Field Organizations (list attached)

I am pleased to provide the attached guidance on an environmental impact statement (EIS) summary, which my staff prepared in coordination with your National Environmental Policy Act (NEPA) Compliance Officers and in consultation with the Office of General Counsel.

An accurate and adequate EIS summary is a specific requirement of the Council on Environmental Quality NEPA regulations (40 CFR 1502.12). Moreover, it is a critically important tool for informing the public and decision makers of the potential environmental impacts of proposed Federal actions and their alternatives. In many cases, the summary forms the first and lasting impression of the EIS as a whole. The EIS summary, therefore, bears a greater than normal obligation to communicate clearly.

During the course of approval review of several recent DOE EISs my staff found it necessary to request substantial reworking of the document summary. In light of these experiences, I am providing this guidance to help your document preparers to summarize an EIS. Although the guidance specifically addresses an EIS summary, the principles of good expository writing it describes apply equally to the body of an EIS.

Please distribute this guidance to those in your organization who prepare or assist in preparing NEPA documents. Please direct questions regarding this guidance to Carol Borgstrom, Director, Office of NEPA Policy and Assistance (phone: 202-586-4600 or fax: 202-586-7031), or Yardena Mansoor of her staff (phone: 202-586-9326 or e-mail: yardena.mansoor@eh.doe.gov).

/signed/

Peter N. Brush
Acting Assistant Secretary
Environment, Safety and Health

Attachment

Environmental Impact Statement
Summary

September 1998

U.S. Department of Energy
Environment, Safety and Health
Office of NEPA Policy and Assistance

printed on recycled paper

GUIDANCE:
ENVIRONMENTAL IMPACT STATEMENT SUMMARY

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Appendix 2: Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements, "Document Summary," page 3, Office of Environment, Safety and Health, May 1993

Appendix 3: Presidential Memorandum: Plain Language in Government Writing, June 1, 1998

U.S. Department of Energy, Office of NEPA Policy and Assistance
September 1998

ENVIRONMENTAL IMPACT STATEMENT SUMMARY

For many readers, the summary forms their first and lasting impression of the environmental impact statement (EIS). The summary also serves to inform the decision maker of the environmental implications of the decision to be made. It is essential, therefore, that the summary be informative, concise, and readable; that it emphasize the environmental implications of alternatives; and that it identify controversies and unresolved issues. The EIS summary bears a greater than normal obligation to communicate clearly.

This guidance reviews the regulatory requirement to prepare an EIS summary, identifies the summary's required contents, provides recommendations for writing a good summary, and discusses how to use the summary to increase efficiency by reducing paperwork. The appendices provide additional resources. Although the guidance specifically addresses an EIS summary, the principles of good expository writing described herein apply equally to the body of an EIS.

This EIS summary guidance is available on the DOE NEPA Web at *http://tis.eh.doe.gov/nepa/* under NEPA Tools. Copies are available on request from the DOE Office of NEPA Policy and Assistance (202-586-4600 or fax at 202-586-7031).

A. The Requirement to Summarize

The Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) Regulations (40 CFR Parts 1500-1508) specify that "Each environmental impact statement shall contain a summary which **adequately** and **accurately** summarizes the statement (§1502.12, emphasis added)."

Emphasize information in proportion to its importance.

To **adequately** summarize the statement, the summary must contain the key information from each of the component elements of the statement: purpose and need for agency action, the affected environment, the no-action and action alternatives, and the principal environmental issues analyzed and the results. In effect, the summary is a miniature EIS, but with sections emphasized in proportion to their importance in the EIS -- that is, important information is discussed in greater detail.

Present only information from the EIS in the summary.

To **accurately** summarize the EIS, the summary must not introduce ideas, information, or conclusions are that not otherwise in the EIS.

B. Required Contents of a Summary

Section 1502.12 of the CEQ NEPA Regulations continues by identifying three elements that must be emphasized in an EIS summary (emphasis added): "The summary shall stress the **major conclusions**, **areas of controversy** (including issues raised by agencies and the public), and the **issues to be resolved** (including the choice among alternatives)."

- **Major Conclusions:** The summary must emphasize the major conclusions of the impact analysis -- that is, the environmental implications of choosing among alternatives. (Conclusions regarding DOE's decision or the acceptability of impacts do not belong in the summary or the rest of the EIS.) As the comparison of alternatives is the heart of an EIS, it must also be the focus of the summary.

> *Focus the EIS summary on comparison of alternatives.*

- **Areas of Controversy:** The summary must identify controversy about the analysis. Describing controversial issues can be important in the event of later litigation over the EIS. By acknowledging controversy, the Department can help demonstrate that it considered all relevant information, including views contrary to the Department's position.

> *Describe public controversy.*

- **Issues to be Resolved:** The summary must state the decision to be made and its relationship to the purpose and need for agency action. This discussion should identify remaining unresolved issues, which may include scientific and technical uncertainties and choice of alternative mitigation measures.

> *State the issues to be resolved, including the decision to be made and its relationship to the purpose and need for agency action.*

It is not necessary to use these three required areas of emphasis as section titles, but it may be helpful to do so.

CEQ's Section 1502.12 concludes by advising that the summary should normally not exceed 15 pages. While the summary for a complex EIS appropriately may exceed the 15-page target length, a summary nevertheless must be concise. Being concise is not the same as being brief, however. Brevity merely implies shortness, while conciseness implies freedom from elaboration and superfluous detail.

C. The Process of Writing the Summary

The NEPA Document Manager should consider writing the EIS summary as a discrete step in document preparation, one which involves some considerations and options that are distinct from preparing the rest of the EIS. It is appropriate, therefore, to consider who should write the summary, and when.

- **Who should write the EIS summary**

  Because the summary must accurately and adequately condense the important information in the EIS, it is appropriate to assign the writing to members of the document preparation team, whether Federal employees or contractors, who are highly familiar with the EIS. Ultimately, however, the NEPA Document Manager must exercise quality control and take ownership of the summary.

  It is helpful to have a professional writer or editor play a supporting role in preparing the summary. It also may be useful to involve "fresh eyes" in writing or critiquing the summary, as a check on how well the EIS is "telling the story" and to identify gaps or inconsistencies in the EIS.

- **When to write the EIS Summary**

  The summary may be written when the rest of the EIS is essentially complete and the main analytical conclusions have been identified. Do not write the summary so late, however, that the EIS cannot be changed if needed improvements are discovered through writing the summary.

> *Write the EIS summary at the eleventh hour, not at midnight!*

The Office of Environment, Safety and Health issued an Environmental Impact Statement Checklist (November 1997), parts of which apply to evaluating the summary's content and readability. (See excerpts in Appendix 1; the entire checklist is available on the DOE NEPA Web at *http://tis.eh.doe.gov/nepa/* under NEPA Tools.)

D. How to Write a Good Summary

This guidance is intended to supplement the "Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements" (the Recommendations paper), which the Office of Environment, Safety and Health issued in May 1993. That paper's

recommendations on a Document Summary are incorporated into this guidance and reprinted as Appendix 2; the entire Recommendations paper is available on the DOE NEPA Web at *http://tis.eh.doe.gov/nepa/* under NEPA Tools.

The recommendations in this section also may be applied to writing a (optional) summary of an environmental assessment. The recommendations are: explain the NEPA process, emphasize important information, focus on presenting and comparing the impacts of alternatives, and use plain language, effective graphics, and reader-friendly layout.

- **Help the reader understand the NEPA process**

  A brief description of the purpose and elements of NEPA review can help the reader understand why an EIS is being prepared and how to participate in the process. This section can include other process-related information from the EIS, including how other environmental review requirements -- for example, Clean Air Act Conformity, floodplain and wetlands review, threatened and endangered species consultations -- are being implemented through the NEPA process. A flowchart of the NEPA process may be helpful.

- **Emphasize Important Information from the EIS**

  The process of writing the summary consists of extracting information from the body of the EIS and packaging it into a coherent narrative. This does not mean simply copying and pasting paragraphs from the rest of the EIS. In particular, using introductory material from each chapter may not be the best way to summarize the chapter. While using language from the body of the EIS for the summary tends to assure consistency, new writing is usually needed to make the summary coherent. Be sure that such new writing summarizes and does not change the EIS.

  Merely "copying and pasting" paragraphs from the rest of the EIS is not a good way to draft the summary.

  If writing the summary is difficult, this may indicate weakness in the rest of the EIS: poor organization, too much discussion of insignificant issues, or encyclopedic rather than concise treatment of subjects. Writing the summary may suggest ways to improve the rest of the document.

  The summary should be a "stand-alone" document; i.e., analyses should be presented in a way that the average reader will understand without referring to the main body of the EIS. It is appropriate to refer to EIS sections where subjects are treated in greater depth, but the

summary generally should include, rather than refer to, important information (definitions, maps, figures, and tables).

The summary of a draft EIS should describe public issues identified during scoping. The summary of a final EIS should describe comments and controversies (if any) regarding the draft EIS. Similar comments may be grouped and discussed in general terms. Provide DOE's general responses to comments and identify major differences between the draft and final EIS.

> *The summary of a draft EIS should identify scoping issues. The summary of a final EIS should describe comments and DOE's responses, and identify major differences between the draft and final EIS.*

- **Focus on Comparing the Impacts of Alternatives**

Emphasize impacts (changes in health and environmental effects), not the intermediate steps in the causal chain (changes in pollutants released or land disturbed).

For each alternative, present each impact absolutely (that is, in terms of its intensity) as well as relatively (that is, as compared to impacts under other alternatives). For example, stating that a pollutant's concentration "would increase by 0.05 percent" or "would meet regulatory/permit requirements" does not inform the reader of the environmental impact of the change. Presenting impact intensity is particularly important when there are no major discriminators between alternatives; merely stating that impacts are similar for all alternatives does not inform whether, for example, the impacts are high enough to warrant mitigation.

> T *Emphasize impacts, not emissions*
>
> T *Present intensity of impacts as well as relative comparisons*
>
> T *Focus on important impacts*
>
> T *Use caution in aggregating component impacts*
>
> T *Do not rely on impact ranges or bounding estimates for comparisons where the EIS presents more accurate information*
>
> T *Use units consistently*

The summary should focus on presenting important impacts and omit trivial impacts that tend to obscure the real issues. The task is to convey both the absolute <u>and</u> relative importance of each impact. If an impact is at a trivial level for each alternative, then relative differences are not important. (If all alternatives have very small and insignificant

impacts in one category of impacts (such as air quality), it does not matter that one is five times as much as another; all have essentially no impacts in that category.)

Guard against inappropriate "rolling-up" or summing of impacts that readers (including decision makers) may value differently, such as impacts on workers vs. impacts on the public, (near-term) impacts from facility operations vs. delayed (long-term) impacts from disposal, impacts from normal operations vs. from accidents, or on the general population vs. on sensitive populations. Similarly, impacts should not be combined when their uncertainties are very different, such as estimated deaths from construction or transportation accidents (frequency well-established) vs. estimated deaths from certain nuclear-materials-handling accidents (much less certain). (Note that this recommendation does not alter the need to describe cumulative impacts in the summary.)

When the EIS presents more accurate information that would help distinguish among alternatives, avoid stating ranges of impacts without relating them to specific alternatives ("the alternatives would produce between 200 and 800 cubic meters of waste") or presenting only bounding impact estimates that obscure differences among alternatives ("all alternatives would produce less than 1,000 cubic meters of waste").

Use consistent measurement units throughout the summary.

T Select units for use throughout the text and tables -- for example, if cubic meter is chosen for expressing volume, do not present some volume values in drums.

T Provide appropriate measurement conversions in the text: normally metric, followed by U.S. units (formerly known as English units) in parentheses -- for example, "a 150-meter (490-foot) restricted zone."

T To the extent practicable, use scientific notation consistently in text and tables. Do not express small numbers differently depending on the number of zeros -- for example, it is difficult to compare 0.001 and $5x10^{-4}$.

- **Use Plain Language**

The June 1, 1998, Presidential Memorandum on Plain Language in Government Writing expresses a priority of making the government more responsive, accessible, and understandable in its communications with the public. (See Appendix 3.) The memorandum identifies some helpful writing techniques, and additional resources may be found at the National Partnership for Reinventing Government's Plain Language Action Network, at http://plainlanguage.gov/ on the Web.

T Use common words as much as possible, and define necessary technical terms. Definitions can be highlighted in "boxes" integrated with the text or provided as a list. (The Office of Environment, Safety and Health has prepared a glossary to assist in this process: "Glossary of Terms Used in DOE NEPA Documents," September 1998, available on the DOE NEPA Web at *http://tis.eh.doe.gov/nepa/* under NEPA Tools. Copies are available on request from the Office of NEPA Policy and Assistance (202-586-4600 or fax at 202-586-7031).)

T Minimize the use of abbreviations and acronyms, and provide a list of those that are used. It has become standard good practice to write out an abbreviation at the first use.

T Break up long sections of text with informative headings and subheadings. Keep paragraphs concise and focused on one topic. Write short sentences.

T Use active voice as much as possible.

Example: Passive and Active Voice

Passive voice does not identify the actor: "A groundwater extraction system was installed in 1993."

Active voice makes clear who acts: "DOE installed a groundwater extraction system in 1993."

- **Use Graphic Aids to Comprehension**

Effective graphic elements -- for example, maps, tables, graphs, and flowcharts -- aid comprehension of text.

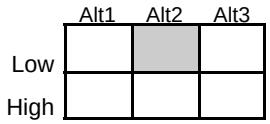
T Key maps from the EIS should be included in the summary. Generally, the summary of a programmatic EIS should contain a map that shows the relevant parts of the DOE complex and indicates their interrelationships within the program in question. The summary for a site-wide or project EIS should contain one or more maps of the site or proposed facility location, and should show, as appropriate, political boundaries, surface water, nearby facilities, population centers, roads and additional significant geographic features. Provide key information while avoiding excessive detail.

T Well-designed tables of impacts of the alternatives may effectively present and compare the impacts of alternatives. Every table should have an informative title and headings. The text should reference the table and discuss the most significant information in the table, without repeating all the data in narrative form.

T Graphs may be highly effective for presenting, explaining, comparing, or summarizing information in the EIS. Be sure that the logic of the graph structure corresponds to the relationships in the information it depicts. Normally, for example, a graph whose purpose is explanatory shows an independent variable on the X-axis and dependent variable(s) on the Y-axis. It is usually not informative to show data in chronological order when time or sequence is not a causal factor in the phenomenon. Graphs, like tables, should have informative titles, labels, and any other information needed for reader comprehension.

T When the alternatives are particularly complex (for example, multiple alternatives with multiple assumptions about a key variable), an icon can be used to identify the case under discussion.

Example: Icon as Reader Aid



An EIS analyzes three alternatives, and for each analysis uses low and high values for a key environmental variable. As each analysis is presented, a small matrix on the top of the page identifies, through shading, the analysis under discussion.

- **Adopt Reader-Friendly Layout**

Reader-friendly layout is another tool for improving document comprehension.

T A readable text is not necessarily set in large type; rather readable text uses blank space generously to make words easier to distinguish. Wide margins and more-than-single spacing between lines are useful approaches. (For example, line spacing in this guidance is set at 1.2.)

T Text boxes can emphasize key points or set off supplementary explanatory material. A question-and-answer format can be effective in creating connections within the flow of information and telling the reader the significance of the information.

- Color printing can effectively highlight significant information. The Government Printing and Binding Regulations (Senate Publication 101-9, No. 26, Feb. 1990) recognize that color printing may add demonstrable value, especially increased clarity of maps and technical diagrams. The Regulations state that color printing must serve the end purpose of the printed item. Recognize, though, that if the document is copied, normally the color will be lost.

E. Using a Summary to Reduce Paperwork

The CEQ Regulations (§1500.4) identify the summary as a tool for saving resources by reducing paperwork. "Agencies shall reduce excessive paperwork by: . . . (h) Summarizing the environmental impact statement and circulating the summary instead of the entire environmental impact statement if the latter is unusually long."

Some stakeholders must receive the complete EIS, not just the summary.

Notwithstanding the requirements of section 1500.4, not all stakeholders should receive only the summary. Those with special status in the NEPA review through the nature of their participation (for example, as cooperating agency, applicant, or commenter) must receive the complete EIS, as must any person or organization who requests it. CEQ's §1502.19 provides further requirements on circulation of the environmental impact statement:

> Agencies shall circulate the entire draft and final environmental impact statements except for certain appendices as provided in Sec. 1502.18(d) and unchanged statements as provided in Sec. 1503.4(c). However, if the statement is unusually long, the agency may circulate the summary instead, except that the entire statement shall be furnished to:
> (a) Any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved and any appropriate Federal, State or local agency authorized to develop and enforce environmental standards.
> (b) The applicant, if any.
> (c) Any person, organization, or agency requesting the entire environmental impact statement.
> (d) In the case of a final environmental impact statement any person, organization, or agency which submitted substantive comments on the draft.

It may be effective to query the intended recipients in advance -- for example, by providing forms at public meetings, return postcards, and electronic media -- to identify people who want only the summary and those who want the complete EIS. To support informed decisions, the query medium should describe the lengths of the various documents.

Section 1502.19 continues: "If the agency circulates the summary and thereafter receives a timely request for the entire statement and for additional time to comment, the time for that requestor only shall be extended by at least 15 days beyond the minimum period." If the timing to complete the NEPA process is critical, the Document Manager should be sure that the schedule can accommodate the 15-day extension if requested.

The procedures for preparing and circulating the final EIS summary should parallel the procedures for the entire EIS. The CEQ NEPA Regulations (§1503.4) provide that when comments on a draft EIS result in minor factual changes or do not warrant further agency response, an agency may attach its responses to the draft EIS instead of rewriting the EIS, and circulate only the comments, responses, and changes to the EIS. In such cases, the summary of the final EIS would consist of the draft EIS summary with an addendum that summarizes the comments received, agency responses, and changes to the EIS. The addendum would be provided to parties who had already received the summary of the draft EIS, and the summary of the draft EIS with the addendum would be provided to others.

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Appendix 1

ENVIRONMENTAL IMPACT STATEMENT CHECKLIST

U.S. Department of Energy
Office of Environment, Safety and Health
Office of NEPA Policy and Assistance

November 1997

DOE ENVIRONMENTAL IMPACT STATEMENT CHECKLIST[1]

LIST 1: GENERAL	YES	NO	N/A	EIS PAGE	ADEQUACY EVALUATION AND COMMENTS
1.1.0 COVER SHEET					
1.1.1 Does the cover sheet include:					
a list of responsible agencies, including the lead agency and any cooperating agencies?					
the title of the proposed action and its location (state(s), county(ies), other jurisdictions)?					
the name(s), address(es), and telephone number(s) of a person (or persons) to contact for further information (on the general DOE NEPA process and on the specific EIS)?					
the EIS designation as draft, final, or supplemental?					
a one-paragraph abstract of the EIS?					
for a draft EIS, the date by which comments must be received? [40 CFR 1502.11]					
1.1.2 Is the cover sheet one page in length? [40 CFR 1502.11]					
1.2.0 SUMMARY					
1.2.1 Does the summary describe:					
the underlying purpose and need for agency action?					
the proposed action?					
each of the alternatives?					
the preferred alternative, if any?					
the principal environmental issues analyzed and results? [Recommendations, p.3]					
1.2.2 Does the summary highlight key differences among the alternatives? [Recommendations, p.3]					
1.2.3 Does the summary stress:					
the major conclusions?					
areas of controversy (including issues raised by agencies and the public)?					
the issues to be resolved (including the choice among alternatives)? [40 CFR 1502.12]					

[1] See list of Abbreviations and Acronyms, p.22.
See list of References, p.23-25.

LIST 1: GENERAL	YES	NO	N/A	EIS PAGE	ADEQUACY EVALUATION AND COMMENTS
1.2.4 Are the discussions in the Summary consistent with the EIS text or appendices?					
1.2.5 Does the summary adequately and accurately summarize the EIS? [40 CFR 1502.12; Recommendations, p.3][2]					
1.3.0 PURPOSE AND NEED FOR ACTION					
1.3.1 Does the EIS specify the underlying purpose and need to which DOE is responding in proposing the alternatives including the proposed action? [40 CFR 1502.13]					
1.3.2 Does the statement of purpose and need relate to the broad requirement or desire for ***DOE*** action, and not to the need for one specific proposal or the need for the EIS? [Recommendations, p.4]					
1.3.3 Does the statement of purpose and need adequately explain the problem or opportunity to which DOE is responding? [Recommendations, p.5]					
1.3.4 Is the statement of purpose and need written so that it (a) does not inappropriately narrow the range of reasonable alternatives, or (b) is not too broadly defined as to make the number of alternatives virtually limitless? [Recommendations, p.5]					
1.4.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES					
1.4.1 Does the EIS clearly describe the proposed action and alternatives? [Recommendations, p.6]					
1.4.2 Is the proposed action described in terms of the ***DOE*** action to be taken (even a private action that has been federalized or enabled by funding)? [Recommendations, p.8]					
1.4.3 Does the proposed action exclude elements that are more appropriate to the statement of purpose and need? [Recommendations, p.8]					
1.4.4 Does the EIS identify the range of reasonable alternatives that satisfy the agency's purpose and need? [Recommendations, p.10]					
1.4.5 Does the EIS "rigorously explore and objectively evaluate" all reasonable alternatives that encompass the range to be considered by the decision maker? [40 CFR 1502.14(a); Recommendations, p.9]					

[2] "Recommendations" refers to guidance entitled "Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements" issued by the Assistant Secretary for Environment, Safety and Health, May 1993).

LIST 1: GENERAL	YES	NO	N/A	EIS PAGE	ADEQUACY EVALUATION AND COMMENTS
1.7.8 Does the EIS show that the agency "has taken a 'hard look' at environmental consequences"? [Kleppe v. Sierra Club, 427 US 390, 410 (1976)]					
1.7.9 Does the EIS present the potential environmental effects of the proposal and the alternatives in comparative form, sharply defining the issues and providing a clear basis for choice? [40 CFR 1502.14 and Recommendations, p.31]					
1.8.0 FORMAT, GENERAL DOCUMENT QUALITY, USER-FRIENDLINESS					
1.8.1 Is the EIS written precisely and concisely, using plain language, and defining any technical terms that must be used? [10 CFR 1021.301(b); Recommendations, p.36]					
1.8.2 Is information in tables and figures consistent with information in the text and appendices? [Recommendations, p.35]					
1.8.3 Is the metric system of units used (with English units in parentheses) to the extent possible? [DOE G 1430.1D; Recommendations, p.35]					
1.8.4 Are the units consistent throughout the document? [Recommendations, p.35]					
1.8.5 Are technical terms defined, using plain language, where necessary? [10 CFR 1021.301(b); Recommendations, p.36]					
1.8.6 If scientific notation is used, is an explanation provided? [Recommendations, p35]					
1.8.7 If regulatory terms are used, are they consistent with their regulatory definitions? [Recommendations, p.37]					
1.8.8 Does the EIS use conditional language (i.e., "would" rather than "will") in describing the proposed action and alternatives and their potential consequences? [Recommendations, p.39]					
1.8.9 Are graphics and other visual aids used whenever possible to simplify the EIS? [Recommendations, p.34]					
1.8.10 Are abbreviations and acronyms defined the first time they are used?					
1.8.11 Is the use of abbreviations and acronyms minimized to the extent practical?					

LIST 1: GENERAL	YES	NO	N/A	EIS PAGE	ADEQUACY EVALUATION AND COMMENTS
1.8.12 Does the EIS make appropriate use of appendices (e.g., for material prepared in connection with the EIS and related environmental reviews, substantiating material, official communications, and descriptions of methodologies)? [40 CFR 1502.18 and 1502.24; Recommendations, p.33]					
1.8.13 Do the appendices support the content and conclusions contained in the main body of the EIS? [Recommendations, p.33]					
1.8.14 Is there a discussion of the relationship between this EIS and related DOE NEPA documents?					
1.8.15 Is the issue date (month and year of approval) on the cover?					
1.9.0 OTHER REGULATORY REQUIREMENTS					
1.9.1 Unless there is a compelling reason to do otherwise, does the EIS include a:					
table of contents?					
index?					
list of agencies, organizations, and persons to whom copies of the EIS were sent? [40 CFR 1502.10]					
1.9.2 Does the EIS identify all federal permits, licenses, and other entitlements that must be obtained in implementing the proposal? [40 CFR 1502.25(b)]					
1.9.3. Does the EIS identify methodologies used in the analyses, include references to sources relied upon for conclusions, and provide documentation or references to documentation for methodologies? [40 CFR 1502.24]					
1.9.4 If a cost-benefit analysis has been prepared, is it incorporated by reference or appended to the EIS? [40 CFR 1502.23]					
1.9.5 If this EIS adopts, in whole or in part, a NEPA document prepared by another federal agency, has DOE independently evaluated the information? [40 CFR 1506.3]					
1.9.6 Does the EIS appropriately use incorporation by reference, i.e.:					
is the information up to date?					
is the information summarized in the EIS?					
are cited references publicly available? [40 CFR 1502.21; Recommendations, pp.14 and 37]					

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Appendix 2

RECOMMENDATIONS for the PREPARATION of ENVIRONMENTAL ASSESSMENTS and ENVIRONMENTAL IMPACT STATEMENTS

Office of NEPA Oversight
U.S. Department of Energy

May 1993

2. DOCUMENT SUMMARY

Background

A document summary facilitates the review of an EA or EIS. CEQ's regulations (40 CFR 1502.12) require a summary for an EIS. Although not required, a brief summary may be included in an EA.

Recommendations

To present an effective summary:

- Describe the content of the document.
- Describe the underlying purpose and need for agency action.
- Describe the proposed action.
- Describe each alternative addressed in the document.
- Identify the preferred alternative (if different from the proposed action.
- Describe the principal environmental issues analyzed and the results.

To avoid commonly encountered problems with summaries:

- Make data and discussions consistent with information in the document.
- Highlight key differences among alternatives.
- Address the entire EA or EIS (that is, do no focus only on one part).

federal register

Wednesday
June 10, 1998

Appendix 3

Part VII

The President

Memorandum of June 1, 1998—Plain Language in Government Writing

Federal Register
Vol. 63, No. 111
Wednesday, June 10, 1998

Presidential Documents

Title 3—

The President

Memorandum of June 1, 1998

Plain Language in Government Writing

Memorandum for the Heads of Executive Departments and Agencies

The Vice President and I have made reinventing the Federal Government a top priority of my Administration. We are determined to make the Government more responsive, accessible, and understandable in its communications with the public.

The Federal Government's writing must be in plain language. By using plain language, we send a clear message about what the Government is doing, what it requires, and what services it offers. Plain language saves the Government and the private sector time, effort, and money.

Plain language requirements vary from one document to another, depending on the intended audience. Plain language documents have logical organization, easy-to-read design features, and use:

- common, everyday words, except for necessary technical terms;
- ''you'' and other pronouns;
- the active voice; and
- short sentences.

To ensure the use of plain language, I direct you to do the following:

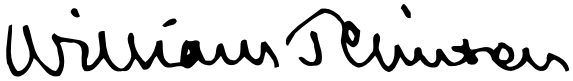
- By October 1, 1998, use plain language in all new documents, other than regulations, that explain how to obtain a benefit or service or how to comply with a requirement you administer or enforce. For example, these documents may include letters, forms, notices, and instructions. By January 1, 2002, all such documents created prior to October 1, 1998, must also be in plain language.
- By January 1, 1999, use plain language in all proposed and final rulemaking documents published in the **Federal Register,** unless you proposed the rule before that date. You should consider rewriting existing regulations in plain language when you have the opportunity and resources to do so.

The National Partnership for Reinventing Government will issue guidance to help you comply with these directives and to explain more fully the elements of plain language. You should also use customer feedback and common sense to guide your plain language efforts.

I ask the independent agencies to comply with these directives.

This memorandum does not confer any right or benefit enforceable by law against the United States or its representatives. The Director of the Office

of Management and Budget will publish this memorandum in the **Federal Register**.



THE WHITE HOUSE,
Washington, June 1, 1998.

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