This template is based on [*Recommendations for the Supplement Analysis Process*](https://www.energy.gov/node/256819)*, Second Edition* (2019) and a review of supplement analyses (SAs) prepared by DOE offices in recent years.[[1]](#footnote-1) It has been updated to reflect changes in the Council on Environmental Quality’s (CEQ’s) NEPA regulations (40 CFR 1500–1508), which became effective on September 14, 2020.

An SA may only require a few pages. As the issues in question become more complex, the template format may need to be revised to capture the full range of relevant subjects and analyses. In any case, the SA need only be long enough to sufficiently answer the question whether an existing environmental impact statement (EIS) remains adequate in light of changes to the proposed action or new circumstances or information. The focus of the SA should be on a concise comparison of the potential environmental impacts as analyzed in the existing NEPA document(s) to the potential impacts considering changes to the proposed action or new circumstances or information.

This template is provided as guidance. DOE offices should adapt it to the circumstances of the issues being evaluated and may prepare their own templates.

## Instructions

In this template:

* Un-bracketed text is standard language that can be retained (generally with little or no revision).
* Bracketed text is a placeholder for text appropriate to the particular project. [UPPERCASE] text should be replaced with project-specific information. [lowercase] text is optional text and may be appropriate to include depending on project circumstances.

### [DOCUMENT NUMBER (see section 4.3 of the SA guidance)]

### [TITLE]

### Introduction

The Department of Energy (DOE) has prepared this supplement analysis (SA) to evaluate one or more existing environmental impact statements (EISs) (listed below) in light of changes that could have bearing on the potential environmental impacts previously analyzed. The Council on Environmental Quality (CEQ) NEPA regulations direct agencies to prepare a supplement to either a draft or final EIS when a major Federal action remains to occur and either the “agency makes substantial changes to the proposed action that are relevant to environmental concerns” or there are “significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.” (40 CFR 1502.9(d)(1)(i)–(ii)). DOE’s NEPA regulations state that when it “is unclear whether or not an EIS supplement is required, DOE shall prepare a Supplement Analysis.” (10 CFR 1021.314(c)). This SA provides sufficient information for DOE to determine whether (1) to supplement an existing EIS, (2) to prepare a new EIS, or (3) no further NEPA documentation is required. (10 CFR 1021.314(c)(2)(i)–(iii)).

Existing EIS(s) evaluated in this SA:

* [EIS TITLE (DOCUMENT NUMBER), LINK. LIST THE EIS OR EISs THAT DOE IS DETERMINING WHETHER TO SUPPLEMENT; DO NOT LIST OTHER NEPA REVIEWS REFERRED TO IN THIS SA (e.g., OTHER NEPA DOCUMENTS REFERENCED IN THE ANALYSIS BELOW).]

### Changes to the Proposed Action or New Circumstances or Information[[2]](#footnote-2)

[COMPLETELY AND CONCISELY DESCRIBE THE CHANGES TO THE PROPOSED ACTION OR NEW CIRCUMSTANCES OR INFORMATION, FOCUSING ON THOSE FACTORS POTENTIALLY RELEVANT TO ENVIRONMENTAL CONCERNS LEADING TO PREPARATION OF THIS SA. ANSWER THE QUESTION: WHY IS DOE PREPARING THIS SA?]

### Background

[PROVIDE ENOUGH INFORMATION FOR THE DECISIONMAKER TO UNDERSTAND THE CONTEXT FOR THE ANALYSIS PRESENTED IN THIS SA. INFORMATION THAT COULD BE HELPFUL INCLUDES THE EXISTING STATEMENT OF PURPOSE AND NEED; A BRIEF DESCRIPTION OF RELEVANT ANALYSES AND DECISIONS, INCLUDING ANY RELATED NEPA REVIEWS; IMPLEMENTATION STATUS OF THE ACTION THAT DOE ANNOUNCED IN THE EXISTING RECORD OF DECISION; AND REASONS FOR THE CHANGES TO THE PROPOSED ACTION OR THE ORIGIN OF NEW CIRCUMSTANCES OR INFORMATION IDENTIFIED IN THE PRECEEDING SECTION.]

### Resource Areas Not Analyzed in this SA

The following resource areas are not analyzed in this SA because it is clear that they will not be significantly affected by the changes to the proposed action or new circumstances or information:

* [LIST ALL RESOURCE AREAS FOR WHICH IT IS CLEAR THAT THERE WILL BE NO SIGNIFICANT IMPACTS FROM CHANGES TO THE PROPOSED ACTION OR NEW CIRCUMSTANCES OR INFORMATION (e.g., THE RESOURCE AREA WILL NOT BE AFFECTED). PROVIDE A BRIEF EXPLANATION WHY EACH OF THESE RESOURCE AREAS DOES NOT WARRANT ANALYSIS IN THIS SA.]

### Resource Areas Analyzed in this SA

The following resources areas are analyzed in this SA:

[FOR RESOURCE AREAS WHERE CHANGES TO THE PROPOSED ACTION OR NEW CIRCUMSTANCES OR INFORMATION MAY HAVE A SIGNIFICANT AFFECT ON POTENTIAL ENVIRONMENTAL IMPACTS, COMPARE THE IMPACTS PRESENTED IN THE EXISTING EIS(s) TO THE POTENTIAL IMPACTS ESTIMATED AS A RESULT OF CHANGES TO THE PROPOSED ACTION OR NEW CIRCUMSTANCES OR INFORMATION. THE COMPARISON CAN BE TO ONE OR MORE OF THE ALTERNATIVES ANALYZED IN DETAIL IN THE EXISTING EIS(s); MAKE CLEAR WHAT ALTERNATIVES ARE BEING COMPARED. A TABLE SUCH AS THE ONE BELOW CAN HELP PRESENT A SUMMARY COMPARISON. SEE SECTION 3.2 OF THE SA GUIDANCE FOR AN EXAMPLE OF PRESENTING POTENTIAL IMPACTS ABSOLUTELY AND IN COMPARISON TO EXISTING ANALYSES. IT IS IMPORTANT TO INCLUDE (IN THE TABLE OR ACCOMPANYING NARRATIVE) REFERENCES OR DISCUSSION TO EXPLAIN THE BASIS FOR ESTIMATES OF POTENTIAL IMPACTS.]

|  |  |  |  |
| --- | --- | --- | --- |
| **Comparison of Potential Environmental Impacts** | | | |
| **Resource Area** | **Summary of Potential Impacts in [TITLE OF EXISTING EIS(s)]** | **Summary of Potential Impacts as a Result of Changes to the Proposed Action or New Circumstances or Information** | **Difference in Potential Impacts** |
| [RESOURCE AREA] | [SUMMARY OF POTENTIAL IMPACTS IN EXISTING EIS(s), INCLUDING CITATION TO RELEVANT ALTERNATIVE, TABLE OR SECTION] | [SUMMARY OF POTENTIAL IMPACTS AS A RESULT OF CHANGES TO THE PROPOSED ACTION OR NEW CIRCUMSTANCES OR INFORMATION, INCLUDING CITATION, WHERE AVAILABLE] | [SUMMARY OF DIFFERENCE IN POTENTIAL IMPACTS ABSOLUTELY AND IN COMPARISON TO EXISTING ANALYSES] |

### Mitigation

[INCLUDE A DISCUSSION OF MITIGATION WHEN THE PROPOSED ACTION OR NEW INFORMATION WARRANTS A CHANGE IN MITIGATION COMMITMENTS. IF NO CHANGES TO MITIGATION ARE EXPECTED, BRIEFLY EXPLAIN HOW MITIGATION WAS CONSIDERED IN THE SA ANALYSIS.] Based on this analysis, DOE will implement mitigation as described in [TITLE OF EXISTING DOCUMENTS(s) WITH MITIGATION COMMITMENTS], with the following changes:

[IN THE TABLE BELOW, DESCRIBE ALL CHANGES TO MITIGATION.]

|  |  |  |  |
| --- | --- | --- | --- |
| **Comparison of Potential Environmental Impacts** | | | |
| **Resource Area** | **Summary of Mitigation in [TITLE OF EXISTING EIS(s)]** | **Summary of Changes to Mitigation as a Result of Changes to the Proposed Action or New Circumstances or Information** | **Difference in Mitigation** |
| [RESOURCE AREA] | [SUMMARY OF MITIGATION IN EXISTING DOCUMENT(s), INCLUDING CITATION] | [SUMMARY OF CHANGES TO MITIGATION, INCLUDING CITATION, WHERE AVAILABLE] | [SUMMARY OF DIFFERENCE IN MITIGATION ABSOLUTELY AND IN COMPARISON TO EXISTING ANALYSES] |

### Determination

In accordance with the National Environmental Policy Act (NEPA) and CEQ’s and DOE’s implementing NEPA regulations, DOE prepared this supplement analysis to evaluate whether the [changes to the proposed action and/or new circumstances or information] require supplementing the existing EIS or preparing a new EIS. DOE concludes that the [changes to the proposed action and/or new circumstances or information] relevant to environmental concerns are not significant and therefore do not require a supplement to [TITLE (DOCUMENT NUMBER) OF EXISTING EIS(s)], consistent with 10 CFR 1021.314(c) and 40 CFR 1502.9(d)(4). No further NEPA documentation is required.

OR

In accordance with the National Environmental Policy Act (NEPA) and CEQ’s and DOE’s implementing NEPA regulations, DOE prepared this supplement analysis to evaluate whether the [changes to the proposed action and/or new circumstances or information] require supplementing the existing EIS or preparing a new EIS. DOE concludes that the [changes to the proposed action and/or new circumstances or information] relevant to environmental concerns are likely to be significant. Therefore, DOE will prepare a [new EIS or Supplemental EIS].

[AN AMENDED ROD MAY FOLLOW AN SA DETERMINATION WHEN COMPLETION OF A SUPPLEMENTAL OR NEW EIS IS NOT REQUIRED. IF, AT THE TIME OF THE SA DETERMINATION, IT IS EXPECTED THAT DOE WILL PREPARE AN AMENDED ROD, IT MAY BE HELPFUL TO INDICATE IN THE SA DETERMINATION THAT “DOE MAY AMEND THE EXISTING ROD.”]

[SIGNATURE, DATE OF SIGNATURE, AND TITLE OF THE APPROVING OFFICIAL.]

1. While SAs are defined in DOE NEPA regulations in terms of EISs, DOE sometimes prepares an analysis analogous to an SA when the adequacy of an environmental assessment (EA) is unclear. This is recognized in DOE’s SA guidance. An approach similar to that represented in this template may be useful when considering the adequacy of an EA. [↑](#footnote-ref-1)
2. Throughout this document, the phrase “changes to the proposed action or new circumstances or information” refers to a substantial change to the proposed action that may be relevant to environmental concerns or significant new circumstances or information that may be relevant to environmental concerns and have bearing on the proposed action or its impacts consistent with 40 CFR 1502.9(d). [↑](#footnote-ref-2)