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 different DOE offices in recent years.[[1]](#footnote-1) This template provides a format to prepare an SA when the change or new information is relatively minor. In such circumstances, 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 a proposed change or new 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 only. DOE offices may adapt it to the circumstances of the issues being evaluated, or prepare their own templates as needed or appropriate.

## Instructions

This template contains:

* Un-bracketed text is standard language that can be retained (generally with little or no revision).
* Bracketed text are placeholders 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 if the “agency makes substantial changes in 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(c)(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)–(ii))

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).]

### Proposed Change or New Information[[2]](#footnote-2)

[COMPLETELY AND CONCISELY DESCRIBE THE PROPOSED CHANGE OR NEW 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 (IF ONGOING); AND REASONS FOR THE PROPOSED CHANGE OR THE ORIGIN OF NEW INFORMATION IDENTIFIED IN THE PRECEEDING SECTION.]

### Resource Areas Not Analyzed in this SA

The following resource areas will not be affected by the proposed change or new information and, therefore, are not analyzed in this SA:

* [LIST ALL RESOURCE AREAS THAT WILL NOT BE AFFECTED BY THE PROPOSED CHANGE OR NEW INFORMATION, AND 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 could be affected by the proposed change or new information:

[FOR RESOURCE AREAS WHERE THE PROPOSED CHANGE OR NEW INFORMATION MAY RESULT IN A CHANGE IN POTENTIAL ENVIRONMENTAL IMPACTS, COMPARE THE DIRECT, INDIRECT, AND CUMULATIVE IMPACTS PRESENTED IN THE EXISTING EIS(s) TO THE POTENTIAL IMPACTS ESTIMATED AS A RESULT OF THE PROPOSED CHANGE OR NEW 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 Proposed Change or New 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 PROPOSED CHANGE OR NEW 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 Proposed Change or New 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 [proposed change and/or new information] requires supplementing the existing EIS or preparing a new EIS. DOE concludes that the [proposed change and/or new information] is not a substantial change relative to the proposal analyzed in the [TITLE (DOCUMENT NUMBER) OF EXISTING EIS(s)]. Therefore, 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 [proposed change and/or new information] requires supplementing the existing EIS or preparing a new EIS. DOE concludes that the [proposed change and/or new information] would constitute a substantial change relative to the analyses and conclusions in the [TITLE (DOCUMENT NUMBER) OF EXISTING EIS(s)]. There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its potential impacts. 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 (“DOE MAY AMEND THE EXISTING ROD”).]

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 “proposed change or new information” refers to a substantial change in a 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(c). [↑](#footnote-ref-2)