STREAMLINING THE PROCESS: A STRATEGY FOR MAKING NEPA WORK BETTER AND COST LESS

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ABSTRACT

When the National Environmental Policy Act (NEPA) was enacted in 1969, neither Congress nor the Federal Agencies affected anticipated that implementation of the NEPA process would result in the intolerable delays, inefficiencies, duplication of effort, commitments of excessive financial and personnel resources, and bureaucratic gridlock that have become institutionalized. The 1978 Council on Environmental Quality (CEQ) regulations, which were intended to make the NEPA process more efficient and more useful to decision makers and the public, have either been largely ignored or unintentionally subverted. Agency policy mandates, like those of former Secretary of Energy Hazel R. O'Leary, to "make NEPA work better and cost less" have, so far, been disappointingly ineffecual. Federal Agencies have reached the point where almost every constituent of the NEPA process must be subjected to crisis management.

This paper focuses on a ten-point strategy for "streamlining" the NEPA process in order to achieve the Act's objectives while easing the considerable burden on agencies, the public, and the judicial system. How the ten points are timed and implemented is critical to any successful streamlining.

The strategy elements discussed in this paper, in no particular order of priority, are as follows: (1) integrate the NEPA process with other environmental compliance and review procedures; (2) accelerate the decision time for determining the appropriate level of NEPA documentation; (3) conduct early and thorough internal EIS (or EA) scoping before public scoping or other public participation begins; (4) organize and implement public scoping processes that are more participatory than confrontational; (5) maintain an up-to-date compendium of environmental "baseline" information; (6) prepare more comprehensive, broad-scope "umbrella" and "site-wide" EISs that can be used effectively for tiering; (7) encourage preparation of annotated outlines with detailed guidance that serve as a "road map" for preparation of each EIS or EA; (8) decrease the length and complexity of highly technical portions of NEPA documents; (9) increase and systematize NEPA compliance outreach, training, and organizational support; and (10) work diligently to influence the preparation of better organized, shorter, and more readable NEPA documents.

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1.0 INTRODUCTION

One of the initiatives of the Clinton administration that has been received with both enthusiasm and indifference is Vice President Al Gore's National Performance Review, usually referred to as "reinventing government." The intent of the program, struggling as it has against an entrenched and often intractable bureaucracy, is to make the Federal Government "work better and cost less." As a result, numerous federal programs have been reorganized, agencies are being "downsized," government procurement has been simplified to some extent, and major efforts to cut waste have been undertaken.

According to the Council on Environmental Quality (CEQ), which has the primary responsibility for implementing NEPA, a total of 10,102 environmental impact statements (EISs) were filed by federal agencies during the 1979 through 1994 period. These filings ran from a high of 1,273 in 1979 to a low of 370 in 1988. The average number of EISs filed annually over the 15-year period was 673. No similar data were compiled for the 1970-1978 period to determine the average costs of EIS preparation, the time required for preparation, or the number of environmental assessments (EAs) prepared. However, as one example, the U.S. Department of Energy (DOE) reported that 13 EISs were completed after June 1994 with a median completion time of 15 months and at an average cost of $5.4 million (DOE, 1997).

Even without additional hard data, it can be safely assumed that the costs of NEPA compliance for both the public and private sectors have run into the billions. Finding ways to streamline the NEPA process -- while maintaining the Act's goals and objectives -- is a legitimate topic for the "reinventing government" agenda.

In 1994, then Secretary of Energy Hazel R. O'Leary, issued a "Secretarial Policy on the National Environmental Policy Act" (DOE, 1994). The policy statement established as an "essential priority" of the U.S. Department of Energy (DOE) "full compliance with the letter and spirit" of NEPA. It recognized the need to ensure quality while improving efficiency, "thereby making NEPA work better and cost less" (DOE 1994). The Secretarial policy made recommendations in a number of areas including the following: delegations of authority throughout the DOE hierarchy; NEPA process changes including early internal scoping and better document preparation scheduling; NEPA contract reform; enhanced public involvement; and completion of final EISs (FEISs) within 15 months from the issuance of a Notice of Intent (NOI).

These policy initiatives have had some effect including reducing the time required for EIS preparation. Many other federal agencies have also attempted to improve and facilitate the NEPA process. Nevertheless, most of the same major NEPA compliance problems remain after 28 years of experience with the Act:
Avoiding NEPA compliance at all costs, even if it means stopping the project.
- Documentation procrastination that results in setting impossible schedules for EA or EIS preparation.
- Failure to use NEPA to make better decisions.
- "Encyclopedia mania" which results in producing massive multi-volume unreadable NEPA documents at considerable costs.
- Inadequate public and agency involvement, causing delay.
- Often atrocious writing, editing, and formatting.
- Preparing an EA where an EIS is required and vice versa.

The "streamlining" strategy elements addressed in this paper cannot resolve problems that are historically endemic to the NEPA process. They cannot overcome "attitudes" long harbored by both agencies and private sector project proponents. However, if implemented, they have the potential to make the NEPA compliance task easier, more helpful to decision makers and the public, and perhaps less oppressive.

2.0 NEPA PROCESS STREAMLINING ELEMENTS

Ten strategy elements for making NEPA work better and cost less are addressed below although a number of other strategy elements could easily be added. No attempt was made to prioritize the elements as it would be virtually impossible to reach a consensus on which elements were more important than others. It is the prerogative of each reader to prioritize the list and add other elements.

None of the NEPA process streamlining strategy elements discussed below are entirely new or unattempted. For the most part, they are uncomplicated, easy to implement, and apparent to most NEPA professionals. Nevertheless, they are restated and reemphasized because they are often ignored by both Federal Agencies and NEPA practitioners.

2.1 Integrate the NEPA Process With Other Environmental Compliance and Review Procedures

The CEQ NEPA implementation regulations require federal agencies to:

Integrate the requirements of NEPA with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively.²

More specifically, the CEQ requires that agencies integrate environmental impact analyses with related "surveys and studies" required by the Fish and Wildlife Coordination Act,³ the National Historic Preservation Act (NHPA),⁴ and the Endangered Species Act (ESA)⁵.

²40 C.F.R. §1500.2(c).
³16 U.S.C. §661 et seq.
⁴16 U.S.C. §470 et seq.
⁵16 U.S.C. §1531 et seq.
Further, an EIS must list all federal "permits, licenses, and other entitlements" which are needed to implement the proposed action.6

EAs and EISs are frequently used as vehicles for surveys, biological assessments, and other investigations associated with compliance with the ESA for threatened and endangered species and the NHPA for historic and archaeological resources. They are less frequently used as permitting or other compliance documentation required by the Clean Air Act (CAA), Clean Water Act (CWA), Safe Drinking Water Act (SDWA), Resources Conservation and Recovery Act (RCRA), and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). [Note: Although the DOE requires compliance with NEPA for activities associated with waste cleanup required under RCRA and/or CERCLA, such compliance is often ignored for reasons beyond the scope of this paper. See NEPA/CERCLA/RCRA Integration: Policy vs. Practice in the proceedings of the 1993 National Association of Environmental Professionals (NAEP) Conference (Hansen and Wolff, 1993).

Consolidating compliance documentation required by other environmental laws and regulations in a single NEPA document can save time, resources, and paperwork. However, very careful scoping is required to avoid preparing a "one-stop shopping" environmental compliance document that is too lengthy and complex for efficient and effective public review. Thus, a proper balance must be sought between addressing NEPA values and other environmental review requirements. If done properly, the CEQ integration requirement can streamline several environmental review procedures simultaneously.

2.2 Accelerate the Decision Time for Determining the Appropriate Level of NEPA Documentation

Determining the appropriate level of NEPA documentation -- EA, EIS, or categorical exclusion (CX) -- is ultimately a federal agency decision. An extraordinary amount of time and associated financial and human resources can be consumed by government contractors and project proponents awaiting agency decisions on whether or how to comply with NEPA for a particular proposed program or project. The problem is particularly acute when awaiting a determination on whether to prepare an EA or an EIS. If the decision is wrong (i.e., the agency decides to prepare an EA when an EIS is really required, or vice versa) even more delay and waste of resources results. Any attempt at "streamlining" the process is dead on arrival.

There is often a critical need to accelerate the CX vs. EA vs. EIS decision making process. The early and comprehensive internal EA or EIS scoping recommended in Section 2.3 below can be used to determine the level of documentation. Another way to reach the EA vs. EIS decision is to determine early if an EIS can be successfully avoided (e.g., when there is a not a major controversy and it is unlikely there will be major unavoidable impacts). If these are likely, time and resources should not be wasted on an EA. Also, a "mitigated" Finding of No Significant Impact (FONSI), often necessary for an EA on a particular

640 C.F.R. §1502.24(b)
project, may not be feasible, realistic, or credible to the public. Likewise, some projects obviously do not require an EIS.

Ideally, both the government contractor (particularly an operating contractor) and the federal decision maker should be cooperatively involved in making the level of documentation determination. Where this is not possible, or not permitted, the contractor should do the analysis necessary to make an informed recommendation to the agency decision maker. Downplaying or simply avoiding the mention of potential public controversy or significant impacts when making a recommendation to the agency is irresponsible and may only "make friends" at the expense of having the agency make the right decision. This is a case in which "streamlining" has an ethical dimension.

2.3 Conduct Early and Thorough Internal NEPA Document Scoping

Internal scoping of an EA or EIS conducted by an agency and (sometimes) its contractors should not be confused with public scoping. NEPA documents should be thoroughly scoped internally before the public scoping process begins. Scoping should be completed before document preparation commences although many EAs and EISs proceed (at their peril) with very little internal scoping. Attempting to conduct internal scoping and public scoping simultaneously is often a recipe for disaster because it is easy for the agency to be "blindsided" by issues raised by the public to which the agency is not prepared to respond. The agency cannot possibly be prepared for a public scoping process when it has not done its own internal homework.

According to the CEQ definition, "scope consists of the range of actions, alternatives, and impacts to be considered in an environmental impact statement." Types of actions, alternatives, and impacts are identified and serve as an authoritative agenda for internal scoping.

Whenever possible, internal scoping should involve both agency and contractor personnel. Of course, if EIS or EA contractors are selected too late in the process, they cannot function as scoping participants. Contractors often lose time (and federal money) at the front end of a project because they have not participated in the agency's internal scoping and feel compelled to do their own. In the worst case, scoping has to be redone in cases where the contractor understands NEPA requirements for a particular project better than the agency client.

Internal scoping need not involve a cast of thousands, dozens of meetings, and large expenditures. A discussion of scoping methodology is beyond the scope of this paper. Suffice it to say that the most effective internal scoping can be accomplished by a small interdisciplinary team led by at least one knowledgeable NEPA professional. Depending on the complexity of the program or project requiring NEPA documentation, sufficient internal scoping can require anything from several days to several months. Above all, thorough internal scoping must precede involving the public. Internal scoping is by far the best preparation for public scoping.

740 C.F.R. §1508.25
2.4 Organize and Implement Public Scoping Processes That Are Participatory Rather Than Confrontational

Requirements for a "early and open" public scoping process are detailed in the CEQ regulations. Federal, state, and local agencies, affected Indian tribes, the project proponent, and "other interested persons" must be invited to participate. While public scoping meetings are optional under the CEQ regulations, they are conducted routinely by some agencies (e.g., the U.S. Forest Service).

Too often the public scoping process, especially scoping meetings, is organized or implemented as an adversarial proceeding with the various "sides" arrayed in vigorous opposition. Frequently, the "project" (e.g., disposing of nuclear waste or damming a trout stream) becomes the issue rather than the scope of the NEPA document. While public controversy can never be avoided altogether, its effects can be mitigated if the public (and other agencies) feel they are being given the opportunity to really participate. Alternatives to public meetings, such as citizen advisory committees, small-group workshops, informal discussions, questionnaires, and interviews, should be considered.

2.5 Maintain An Up-to-Date Compendium of Environmental "Baseline" Information

"Baseline" environmental information documentation is needed for both day-to-day NEPA compliance and to support the broad-based "umbrella" documents discussed in Section 2.6 below. The existence of up-to-date environmental baseline reports, where all of the baseline information is compiled in one document, significantly decreases the time and cost associated with NEPA document preparation. It is proven effective way to avoid "reinventing the wheel" through a series of successive documents.

"Environmental baseline" refers to the existing physical, biological, and socioeconomic environment before it is altered (beneficially or adversely) by a proposed federal program or project. The baseline should consist of data on a wide diversity of environmental parameters (e.g., air and water quality, hydrology, meteorology, cultural resources, sensitive species, and socioeconomics). While all of the baseline information compiled will not be relevant to every proposal, having it available "just in case" will inevitably result in greater in greater efficiencies. The presentation of these data in the "affected environment" section of an EA or EIS can be tailored to focus on the significant environmental issues that vary from one document to another. Standardizing this information and focusing on what is really important helps enormously in eliminating encyclopedic discussion and insignificant or unnecessary detail. It also avoids reconstructing the environmental baseline description for each NEPA document.

Preparing environmental baseline reports can also avoid ignoring what some may consider to be uncommon topics that may need to be addressed.

840 C.F.R. §1501.7
in NEPA documents less frequently than others. For example, many agencies do not regularly analyze parameters like noise, vibration, or visual resources. Nevertheless, these can be included in a baseline document if there may possibly be a need in the future. (Frequently, there is resistance to addressing new environmental parameters on a case-by-case-basis.)

Environmental baseline information can be published in separate technical reports and periodically rolled up into comprehensive baseline reports for an entire site or geographic area. Once the baseline information is published, it can be incorporated by reference in accordance with the CEQ requirements.

2.6 Prepare More Broad-Scope "Umbrella" and Site-Wide EAs and EISs That Can be Used for Tiering

Federal agencies and NEPA practitioners need to prepare more broad-scope EAs or EISs that can be used for "tiering": using a broad-scope document on an entire program or set of related actions from which to "tier" a document of narrower, more project-specific scope. Preparation or more "umbrella" documents will contribute significantly to reducing the overall level-of-effort required for NEPA compliance by any agency or federal installation. Preparing broad-scope documents is a key element of "streamlining" the NEPA process. It can incorporate by reference a considerable amount of material and avoid needless preparation of often redundant paperwork.

While "tiering" refers to broad-scope or "programmatic" EISs in the CEQ regulations context, the concept need not be confined to EISs and subsequent documents. A broad-scope EA can also be used for a tiering document. Whether the broad-scope document is an EA or an EIS, subsequent documents of narrower scope need only summarize issues discussed in the umbrella document or incorporate appropriate sections by reference.

The preparation of broad-scope NEPA documents can also provide a competitive advantage for obtaining projects and programs which competitors are still struggling to bring into NEPA compliance (Wolff and Hansen, 1992). For example, broad-scope documents addressing multifaceted and complex environmental restoration activities can be used as tiering documents for site-specific cleanup projects of smaller scope.

For some inexplicable reasons, federal agencies have repeatedly failed to take advantage of the tiering mechanism. It is incumbent upon every project manager and NEPA practitioner to examine a possible tiering opportunity for every large program or complex project.

2.7 Prepare Annotated Outlines That Serve As a "Road Map" for EA or EIS Preparation

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9 40 C.F.R. §1502.21
10 40 C.F.R. §1502.20
An enormous amount of time and resources are wasted by EA or EIS project managers who delegate various NEPA document topics or "sections" to selected authors with little, if any, specific guidance regarding content or approach. An author may spend days or even weeks struggling with his or her assignment only to discover under the duress of an oppressive schedule that what they have produced is seriously flawed and that another iteration (or successive iterations) is required. Not only are the authors lacking in direction; they are also working in a vacuum with little understanding of what has to be covered in the entire document.

Although the CEQ regulations recommend a "format" for preparing an EIS,¹¹ there is no requirement or guidance for preparing a detailed outline of NEPA documents. Innovation is necessary because agencies and authors are on their own.

Detailed annotated outlines serve as a "blueprint" or "road map" for the preparation of each EA or EIS. Such an outline is much more than a mere table of contents. Annotated outlines frequently prepared at Sandia National Laboratories in New Mexico (SNL/NM) are generally organized in a tabular format consisting of four columns: (1) outline element (table of contents); (2) target number of pages for each element; (3) persons (authors) responsible for each element; and (4) contents and data needs for each element. The latter column is particularly important because it provides specific guidance to the authors on the desired content of each section or subsection of the document, the recommended approach to the topic, and what data gaps need to be filled.

The annotated outline also assures that individual authors, who are often members of a large interdisciplinary "team," need not work in a vacuum. The outline gives them a clear understanding of what the entire document is intended to cover and how their sections relate to or overlap with other sections. If the document authors as a group can participate in development of the outline, the potential advantages are even greater.

It is surprising that so many EAs and EISs are prepared without the benefit of an annotated outline. Often, incomplete tables of contents are written on a chalkboard at a hastily called staff meeting. Preparing an annotated outline is one proven method to avoid the costs and delays that result from individual NEPA document authors charging off in all directions without a compass.

2.8 Decrease The Length and Complexity of Highly Technical Portions of NEPA Documents

Although all parameters addressed in a NEPA document are technical, some have greater technical complexity than others. Examples of highly technical topics include, but are not limited to: human health and ecological risk assessment; radioactive waste transportation (and risk assessment); electromagnetic radiation; air quality and ground water modeling; and noise modeling (as for airports).

¹¹ 40 C.F.R. §1502.10
While all members of a NEPA documentation interdisciplinary team are specialists in some technical or scientific discipline, some disciplines are more specialized than others in terms of public understanding. Authors in these highly specialized technical and scientific areas tend to communicate only with their peers in the same disciplines or specialties. Unfortunately, what they write for NEPA documents is not intended for the public review and comment required by the NEPA process.

For example, risk assessments in NEPA documents that address hazardous materials management activities often become the dominating element. They consist primarily of computer-generated numerical modeling data contained in numerous tables and appendices and expressed in esoteric mathematical terms that agency and public reviewers in other disciplines cannot understand or interpret (e.g., $4.14 \times 10^{-3}$ and $2.90 \times 10^{-2}$). Explanatory and interpretive footnotes are rarely included and results of calculations [e.g., incremental cancer risk (ICR)] are almost never compared with standards or permissible limits. In short, risk assessment is usually a vast data collection exercise undertaken by risk assessment professionals for the benefit of other risk assessment professionals. For some NEPA documents, the risk assessment data are so extensive that entire volumes are devoted to appendices which contain only additional computer-generated data.

Highly technical data must be presented in a succinct, understandable manner and interpreted for the benefit of sophisticated readers who may hold doctorates in disciplines other than the authors.

2.9 Increase and Systematize NEPA Compliance Outreach, Training, And Organizational Support

Certainly one of the major reasons (perhaps the major reason) for decision delays, EA vs. EIS confusion, numerous document writing reiterations, inability to meet schedules, and repeated cost overruns is the lack of NEPA training for project managers, document authors, and others with NEPA compliance responsibilities. Training in the philosophy, purpose, and method of NEPA compliance is absolutely essential for everybody involved in the NEPA process -- from the loftiest high-level decision maker to the lowliest EA or EIS subsection author or technical editor.

Unfortunately, such training is often (if not usually) lacking for those who must make decisions on and implement the NEPA process.

Training in the NEPA process and the preparation of NEPA documents may be done by in-house NEPA professionals or by consultants. Getting the most qualified training professionals is more important than whether they belong to a government organization or private company.

NEPA compliance courses that should be required may include such titles as:

- NEPA Awareness
- Integrating NEPA into Project Planning
- CEQ and (Specific) Agency Requirements
Preparing An Environmental Assessment
The "NEPA Process" and How to Apply It
Writing Effective NEPA Documents

Courses such as these should be held on a regular, scheduled basis and not sporadically. Participation incentives should be used where appropriate because nobody can be "forced" to attend a NEPA compliance course, particularly when courses in ground water modeling, risk assessment, or waste cleanup are more popular.

In addition, seminars should be organized for specialized topics on a case-by-case basis. Such seminars could also be provided for both internal and external outreach efforts such as public workshops or citizen advisory committee meetings.

2.10 Work Diligently to Prepare Better Organized, Shorter, More Readable NEPA Documents

None of the other nine NEPA process streamlining strategy elements discussed above will be very effective if EAs and EISs continue to be poorly organized and written in language that is often incomprehensible to public reviewers (see Section 2.8 above). The CEQ regulations require, not merely suggest, that NEPA document authors "reduce excessive paperwork," curtail document length, prepare documents that are "analytic rather than encyclopedic," write in "plain language," and follow a "clear format."12 Paperwork reduction methods identified by the CEQ13 include: reducing "background" material; narrowing the scope to focus on "significant" issues; incorporating by reference; "tiering" narrow-scope project EISs from broad-scope "program" documents (see Section 2.6); and integrating the NEPA process with other environmental review requirements (see Section 2.1 above).

Contrary to the CEQ requirements, NEPA documents are too long, detailed, encyclopedic, and technical to be understood by the public. This is understandable because, for many authors of NEPA documents, it is easier to write a Ph.D. thesis than it is to write two succinct pages. Henry David Thoreau noted in 1857: "Not that the story need be long, but it will take a long while to make it short" (Bartlett, 1980). Alexander Pope (1688-1744) wrote:

> Words are like leaves; and where they most abound,
> Much fruit of sense beneath is rarely found (Bartlett, 1980)

NEPA document authors predominantly write for their peers in the same discipline rather than attempting to "insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken."14 The public cannot scrutinize what it cannot understand. Project managers responsible for NEPA compliance and NEPA professionals must learn to focus at least as

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12 40 C.F.R. §1500.4
13 40 C.F.R. §1500.4
14 40 C.F.R. §1500.1(b)
much attention on the organization and writing of NEPA documents as on their technical content.

In his book, O.J. The Last Word, famed Wyoming trial attorney Gerry Spence laments the failure of lawyers to communicate effectively with jurors. Although his comments are addressed to the need for lawyers to improve their verbal communications, they apply equally to anyone writing a technical document:

Explaining technical facts requires the ability to speak in clear, understandable language. Lawyers who do not know, and do not want anyone to know that they do not know, use big words. The same goes for the expert witness. Albert Einstein was able to explain the theory of relativity in a simple, straightforward way on a few handwritten sheets of paper that any high school physics teacher could understand. . . . The most difficult, the most complicated issue, legal, technical, scientific, or otherwise, can be made understandable by those who understand it themselves and who are able to speak [or write] in plain English. (Spence, 1997)

Learning to write in clear, understandable prose is not given a high priority in the American educational system or in the technical and scientific communities. Lip service to the contrary, employers are looking for employees with "a good technical background," not for people who can communicate well verbally or in writing. The younger generation, raised on the Internet and communicating primarily by e-mail, are computer literate but unschooled in the use of English or any other language. Thus, while very few NEPA document authors will have the opportunity to emulate the Hemingways and the Faulkners, the following suggestions may be helpful:

- Authors should write for agency and public reviewers who are not experts in a particular discipline. They should not write only for their peers.

- Authors should avoid including encyclopedic detail for any topic but, particularly, topics like description of the affected environment and risk assessment.

- Authors should refer regularly to the annotated outline prepared for the EA or EIS (see Section 2.7).

- Document reviewers should refrain from insisting on the inclusion of additional technical detail that only detracts from public understanding.

- Technical editors should be used to check grammar, spelling, syntax, references, typographical errors, formatting, and conduct other strictly editorial tasks but should not be delegated the function of writing or rewriting the NEPA document.
Agencies, consulting firms, and other NEPA document preparation contractors should issue awards or other incentives to authors who prepare succinct and understandable documents that meet NEPA objectives while remaining technically and scientifically credible.

CONCLUSION

As stated at the beginning of this paper, none of these "streaming" elements are new. These and many other strategy elements have been used or attempted over the 28-year history of NEPA. "Lessons learned" can easily become "lessons unlearned" without persistent endeavor and determination. But repeated failures, honestly recognized, can lead to great successes. NEPA must be made to work efficiently if it is to survive in anything resembling its present form.

REFERENCES


