

2015 Supporting Statement
7 CFR 1970, Environmental Policies and Procedures
(OMB No. 0575-NEW)

7 CFR Part 1970, Environmental Policies and Procedures

The purpose of this request is to seek a new clearance for the reporting requirements contained in the 7 CFR part 1970, subparts A-D. The Rural Development agencies (Rural Business-Cooperative Service, Rural Housing Service, and Rural Utilities Service) (unless specified, hereinafter referred to as Rural Development (RD)) are consolidating, simplifying, and updating the different agency environmental policies and procedures into a common environmental regulation. The new RD regulation 7 CFR part 1970 (subparts A through D) will replace 7 CFR part 1794, the current RUS environmental policies and procedures (OMB No. 0572-0117) and 7 CFR part 1940, subpart G, the current RHS/RBS environmental regulation (OMB No. 0575-0094). Once 1970 is published the paperwork burden packages under 1794 and 1940-G will be superseded. The Farm Service Agency who is under 7 CFR part 1940, subpart G will not be covered under this new rule; they are also drafting new environmental policies and procedures.

A. Justification

1. Explain the circumstances that make the collection of information necessary.

The National Environmental Policy Act (NEPA) (42 USC 4321 *et seq*) and other applicable environmental and historic preservation statutes require all Federal agencies to consider the potential environmental consequences of their actions on the quality of the human environment and historic properties before agency decisions are made and prior to it taking an action; in RD's case the "action" is the approval of financial assistance and obligation of Federal funds. To comply with NEPA and other environmental laws, regulations and Executive Orders, RD requires applicants submitting applications for financial assistance to include project-specific environmental information along with other underwriting requirements. The purpose of this information is to evaluate and document the environmental implications of applicant's proposals.

Most projects funded under RD programs require the use of design professionals, i.e., architects or engineers. These design professionals assist applicants in preparing preliminary design documents which define the scope of each project proposal and provide itemized lists of construction-related project components that have the potential to affect environmental resources and historic properties. Specific design documents are required by different RD program regulations and are submitted as part of the application process by applicants seeking financial assistance. In addition to these design documents, design professionals use RD-provided guidance documents and, if necessary, additional environmental or technical consultants to evaluate potential environmental impacts of the project proposal. In many cases the resulting environmental review documents are also provided to the public and other interested parties for review and comment before RD takes its action.

Since applicants are required to submit preliminary design information with their applications, applicants are the logical source for gathering environmental information during early planning and design of their project proposals. Integrating environmental review requirements with early project planning and design is consistent with NEPA policies (Section 102) and requirements in

the Council on Environmental Quality's regulations for implementing the procedural provisions of NEPA (40 CFR part 1500) (40 CFR §§ 1500.2 (c); 1500.5; 1501.1; and 1501.2) and most other environmental or historic preservation statutes and regulations. RD's approach for requesting project-specific design and environmental information is consistent with other Federal agencies that provide financial assistance or permits to non-Federal applicants.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

Project-specific financial, technical, and environmental information gathered and submitted by applicants is used by RD officials in its underwriting and technical evaluation process to determine a project proposal's eligibility for financial assistance. Included in the applicant's applications are preliminary designs and environmental data and information that: describes the purpose and need for the proposal and potential environmental impacts if it were to be built; analyzes reasonable alternatives to avoid or minimize any adverse environmental impacts; and outlines construction cost and operation and maintenance estimates, and other financial information crucial to the underwriting process. From an environmental perspective, RD officials use this information to evaluate and document the potential environmental impacts of the proposal, and to ensure that proper consultation with local, state, and Federal natural resource and environmental regulatory agencies and tribes has been conducted and concluded in accordance with the various environmental and historic preservation statutes and regulatory requirements.

Required environmental information from applicants includes documentation to support the following levels of NEPA review. Those levels include:

- Categorical Exclusions (CE);
- Environmental Assessments (EA); and
- Environmental Impact Statements (EIS).

As in the two rules 1970 is replacing, 1970 supplements the CEQ regulations by classifying each agency action into the three levels of NEPA review described above.

If a project proposal has a potential for significant environmental impacts, agencies are required to prepare an EIS. In making this determination, an analysis of alternatives and the potential environmental impacts on the quality of the human environment must be considered. An EA, a concise public document, is prepared to provide sufficient evidence and analysis for determining whether to prepare an EIS or for the agency to conclude that the project proposal will not have a significant environmental effect on the human environment. This decision is documented by preparing and publishing a public notice of a "finding of no significant impact" (FONSI). Similar information is collected to document RD's decision to use a CE for a project proposal. This information is used to document whether there are any "extraordinary circumstances" that would preclude the use of a CE (see 40 CFR § 1508.4). Therefore the purpose of collecting environmental information is to support RD's decision making with regard to the need for completing an EIS, EA, or whether a project proposal qualifies for the use of a CE.

Specifically, the burden to be cleared with this docket is as follows:

Reporting Requirements - Written

Exhibit B-2, Guidance to Applicants for Preparing Environmental Reports (Categorical Exclusions)

Exhibit C-2, Guidance to Applicants for Preparing Environmental Assessments

Exhibit D-2, Guidance to Applicants for Preparing Environmental Impact Statements

All of the above Exhibits outlines the environmental information RD officials need to process each application to comply with NEPA and all of the other environmental statutes, regulations, and Executive Orders. As described above, the required environmental information includes preliminary design and environmental data that:

- Describes the purpose and need for each proposal;
- Evaluates potential environmental impacts of the proposal for specific environmental resources and historic properties;
- Analyzes reasonable alternatives, if necessary, that would avoid or minimize adverse environmental effects; and
- Outlines construction cost and operation and maintenance estimates, and other financial information crucial to the underwriting process.

Each level of NEPA review, i.e., CE, EA, or EIS, requires specific information relative to each action's type of construction and the magnitude of potential impacts.

Exhibit B-2, Guidance to Applicants for Preparing Environmental Reports (Categorical Exclusions)

The actions listed in §§1970.53 through 1970.55 are classes of actions that the Agency has determined do not individually or cumulatively have a significant effect on the human environment (referred to as "categorical exclusions" or CEs). These actions include projects involving no or minimal disturbance, small scale development, and multi-tier action projects. Only small scale development projects require an environmental report (ER).

The CEs in this section are for proposals for financial assistance that require an applicant to submit an ER with their application to facilitate Agency determination of extraordinary circumstances. At a minimum, the ER will include a complete description of all components of the applicant's proposal and any connected actions, including its specific location on detailed site plans as well as location maps equivalent to a U.S. Geological Survey (USGS) quadrangle map; and information from authoritative sources acceptable to the Agency confirming the presence or absence of sensitive environmental resources in the area that could be affected by the applicant's proposal. The ER submitted must be accurate, complete, and capable of verification. The Agency may request additional information as needed to make an environmental determination. Failure to submit the required environmental report will postpone further consideration of the applicant's proposal until the ER is submitted, or the Agency may deny the request for financial assistance. The Agency will review the ER and determine if extraordinary circumstances exist. The Agency's review may determine that classification as an EA or an EIS is more appropriate than a CE classification.

Exhibit C-2, Guidance to Applicants for Preparing Environmental Assessments

An EA is a concise public document used by the Agency to determine whether to issue a FONSI or prepare an EIS. If, at any point during the preparation of an EA, it is determined that the proposal will have a potentially significant impact on the quality of the human environment, an EIS will be prepared. The EA must focus on resources that might be affected and any environmental issues that are of public concern.

The amount of information and level of analysis provided in the EA should be commensurate with the magnitude of the proposal's activities and its potential to affect the quality of the human environment. At a minimum, the EA must discuss the following:

- The purpose and need for the proposed action;
- The affected environment, including baseline conditions that may be impacted by the proposed action and alternatives;
- The environmental impacts of the proposed action including the No Action alternative, and, if a specific project element is likely to adversely affect a resource, at least one alternative to that project element;
- Any applicable environmental laws and Executive Orders;
- Any required coordination undertaken with any Federal, state, or local agencies or Indian tribes regarding compliance with applicable laws and Executive Orders;
- Mitigation measures considered, including those measures that must be adopted to ensure the action will not have significant impacts;
- Any documents incorporated by reference, if appropriate, including information provided by the applicant for the proposed action; and
- A listing of persons and agencies consulted.

Exhibit D-2, Guidance to Applicants for Preparing Environmental Impact Statements

The purpose of an EIS is to provide a full and fair discussion of significant environmental impacts and to inform the appropriate Agency decision maker and the public of reasonable alternatives to the applicant's proposal, the Agency's proposed action, and any measures that would avoid or minimize adverse impacts.

Agency actions for which an EIS is required include, but are not limited to:

- (1) Proposals for which an EA was initially prepared and that may result in significant impacts that cannot be mitigated;
- (2) Siting, construction (or expansion), and decommissioning of major treatment, storage, and disposal facilities for hazardous wastes as designated in 40 CFR part 261;
- (3) Proposals that change or convert the land use of an area greater than 640 contiguous acres;
- (4) New electric generating facilities, other than gas-fired prime movers (gas-fired turbines and gas engines) or renewable systems (solar, wind, geothermal), with a rating greater than 50 average MW, and all new associated electric transmission facilities;
- (5) New mining operations when the applicant has effective control (*i.e.*, applicant's dedicated mine or purchase of a substantial portion of the mining equipment); and
- (6) Agency proposals for legislation that may have a significant environmental impact.

Publish notifications:

A basic tenet and objective of NEPA and other environmental statutes and regulations is public involvement, whereupon agencies are required to formally seek public input on the agencies' actions before that action is taken. This input is sought, as appropriate, from the public and other interested parties; local, state, and Federal natural resource and environmental regulatory agencies; and tribes.

RD's new environmental policies and procedures only require public notices on actions that are classified as EAs or EISs. For EAs, applicants will be required to publish public notices in local newspapers in the areas affected by the project proposal announcing the availability of the EA for public review and comment. At the conclusion of the public comment period and after consideration of all public comments, if appropriate, RD will require applicants to publish a public notice in the same newspapers as above announcing the agency's finding (FONSI) that the proposal will not have a significant environmental impact and that an EIS will not be prepared. This public notification process is similar to that used by many other Federal agencies.

When EISs are prepared, there is an extensive, more formal public involvement process that involves multiple public notices in both local newspapers and the *Federal Register*; most EIS-level projects also require multiple public meetings. The standard EIS public notices for applicants and RD include:

- Notice of Intent to Prepare an Environmental Impact Statement and to Hold Public Scoping Meetings;
- Notice of the Availability of a Draft Environmental Impact Statement and to Hold a Public Meeting to Solicit Public Comments;
- Notice of the Availability of a Final Environmental Impact Statement; and
- Notice of the Availability of a Record of Decision.

Applicants will be required to publish the above notices in local newspapers and RD will publish similar notices in the *Federal Register*. This public notification process is standard for all Federal agencies preparing EISs.

Assist in public meetings:

Where a project proposal is controversial for environmental reasons or where an EIS is required, public meetings are typically held to inform the public and solicit comments on the proposal. Applicants are expected to participate in such meetings and to assist by securing meeting locations, and by publishing public notices that will notify the public of the time and place of the meeting, and inviting the public to attend. Public notices could include publishing a notice of the meeting in a local newspaper, advertising through local radio or monthly bills (for utilities), and/or posting notices in public places, online resources, etc.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

Automation of the environmental review process is an important goal for RD. Automating both Exhibits B-2 and C-2 will enable applicants to submit environmental information electronically. This is supportive of current initiatives in eGOV and will aid customers and staff reduce application processing time. RD continues to make progress toward accepting electronic submittals of environmental information from applicants and their consultants. Most applicant environmental information and documents are already submitted electronically to appropriate RD staff and specific RD programs are developing internal tracking applications that will be able import the electronic information for collecting, storing, and tracking environmental compliance data for internal purposes and external reporting responsibilities.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Another basic tenet and objective in NEPA (40 CFR §§ 1500.4(n), 1500.5(h); 1502.4(d)) and 1970 (7 CFR §§ 1970.11, 1970.15) is to minimize duplication of efforts. RD has longstanding policies that minimize the duplication of gathering environmental information and documents. These policies are implemented by emphasizing to applicants via RD regulations that applicants should consult with the agency early in the planning process for their project proposals. The objective of this interaction is so that RD officials can advise applicants, among other issues, of all environmental review requirements and to determine whether there are other co-funding agencies involved in the project proposal. The latter is significant in determining whether previous documentation has been prepared. If co-funding or other agencies have been or are involved and documentation has already been prepared, RD will, upon review, adopt this documentation to avoid duplication of effort. If environmental documentation has not been prepared, RD will strongly encourage all co-funding agency(s) to jointly prepare one environmental review document so that the document can be used by all agencies.

In most cases, the information being requested by the rule is unique and project specific with little pre-existing environmental information. However, with cooperation of the applicant and other Federal and state agencies, there are some opportunities to minimize duplication by using information already collected for similar proposals or for those in the same geographic area. By exploiting these opportunities for cooperation, discussions with agencies with special environmental expertise or jurisdiction by law can facilitate planning in a timely manner.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Ninety percent of RUS electric and water program borrowers, and all telecom borrowers, meet the Small Business Administration criteria for small businesses. Most RBS applicants also meet these criteria. RD makes every effort to ensure that the information requested is designed to minimize the paperwork burden on small business, especially small engineering, architectural, and environmental consulting firms. The information required and collected is the minimum required by RD for its application process, and seeks to ensure that the environmental consequences of a proposed action are identified early and adequately addressed as required by NEPA and other environmental statutes and regulations. In general, RD has developed specific guidance documents to itemize the information needed and the sources where the information can be obtained. In addition, RD headquarters and field staff are available to consult with and

assist firms to the extent possible in preparing the required documents. The burden on small businesses and other small entities is also minimized by RD classifying certain types of routine activities as CEs under NEPA and by providing specific guidance, i.e., Exhibit B-2, Guidance to Applicants for Preparing Environmental Reports, to applicants in the project proposal's early planning and design process so environmental information can be gathered efficiently and in a timely fashion.

Actions under 7 CFR part 1970 taken to minimize the burden on applicants and small businesses or other small entities include:

- Updated and expanded the list of CEs that require environmental reports; those actions are generally minor construction proposals, including small-scale energy or telecommunication proposals.
- Reduced environmental review requirements for actions classified as CEs that require environmental reports.
- Better, more focused guidance documents for the collection of environmental information and data, providing clarity where and from whom this information can be obtained.

Small-scale entities will benefit most from these CE classifications. There is a correlation between the type of applicant and the size of the project proposal; smaller-scaled entities are generally involved with smaller-scale projects. Consequently, many of their applications would require the less burdensome data collection associated with CEs or even EAs for smaller scaled projects.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Environmental information and data needed for NEPA reviews is not completed on a periodic basis, but on an application-by-application or project-by-project basis. Failure to collect the information would result in the Agency's noncompliance with NEPA and numerous other Federal environmental statutes, regulations, and Executive Orders, which are integrated and coordinated into the agency's NEPA process. RD would not be legally allowed to approve or obligate Federal funds without complying with these laws, regulations, and Executive Orders.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

a. Requiring respondents to report information more than quarterly.

There are no requirements for respondents to report information other than what is project specific and associated with specific funding applications. Once a request for financial assistance has been approved, no or minimal information (additional information is only requested under limited situations where formal mitigations measures have been required; these situations are required in less than 0.5% of projects) is required.

b. Requiring written responses in less than 30 days.

There is no requirement to respond in less than 30 days.

c. Requiring more than an original and two copies.

There is no requirement of requiring more than the original and two copies of the information to be submitted.

d. Requiring respondents to retain records for more than 3 years.

For RUS programs - record retention requirements shall be in accordance with 7 CFR 1767, part D, and are in agreement with Federal Energy Regulatory Commission's (FERC) "Regulations to Govern the Preservation of Records of Public Utilities and Licensees" at 18 CFR part 125. Otherwise there are no other RD requirements on respondents' retention of records.

e. In connection with a statistical survey, not designed to produce results that can be generalized to the universe of study.

There is no such requirement.

f. Requiring use of statistical sampling which has not been reviewed and approved by OMB.

This collection does not employ statistical sampling.

g. Requiring a pledge of confidentiality.

There is no requirement of a pledge of confidentiality.

h. Requiring submission of proprietary trade secrets.

There is no requirement to submit propriety trade secrets.

8. Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

As required by 5 CFR 1320.8(d), a Notice to request comments was embedded in the proposed rule which published on February 4, 2014 [Vol. 79, No. 23, page number 6740. [No] comments were received related to the publication of the Notice.

Depending on the program, RD officials at State or National Offices maintain close contact with borrowers through general field representatives (GFR), field accountants (FA) or local staff in the States. Field staff has direct personal contact with RD applicants and borrowers on a regular basis to fulfill the Agency's pre- and post-loan requirements by providing technical assistance and guidance.

RD consulted with persons who are familiar with Agency requirements for environmental information and public participation. These individuals are representative of the types of respondents who are most likely to be subject to the full range of Agency programs and environmental requirements. They were asked to provide an analysis of the public burden associated with environmental information and public participation requirements. The Agency contacted the following three respondents:

1. Karl Myers
Tri-State Generation and Transmission Association
P.O. Box 33695
Denver, CO 80233-0695
Tel: (303) 452-6111
<mailto:kmyers@tristategt.org>

2. Jim Behnken
JGB Consulting
1605 Monte Largo Dr. NE
Albuquerque, NM 87112
Tel: (505) 298-9542
<mailto:JGB@swcp.com>

3. David McDaniel/Richard Chamberlain
Brazos Electric Power Cooperative
P.O. Box 2585
Waco, TX 76702-2585
Tel: (254) 750-6324
<mailto:dmcdaniel@brazoselectric.com>

All respondents generally stated that the information provided is also required by or can be, in most cases, provided to Federal and state agencies for environmental compliance purposes and is the minimum possible to adequately address environmental issues associated with construction activities. The three respondents commented that data availability for this collection was good and, as time progresses, more datasets are available electronically. Respondents noted that, for example, RUS program regulations clearly define project categories making it easy to determine the proper environmental classifications and requirements for each project proposals. Environmental bulletins and guidance documents are logically written and contain good examples. RD staff is readily available to answer questions or guidance via telephone or email, thereby reducing the amount of time needed to resolve problems. The ongoing development process for electronic submittal of documents should reduce the overall time necessary to review documents and will reduce the expense of producing and submitting multiple hard copies of documents. All respondents' responses on costs and labor burdens are integrated in this new package.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There is no provision for payment or gift to any respondent.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy.

No assurance of confidentiality is provided to respondents. Environmental reviews and their supporting data and information are full disclosure documents and available to the public upon request.

There are provisions for confidentiality if sensitive archeological or sacred sites are within the area of project effects. This information is redacted from review documents or reports published during the public review process of RD actions.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

The regulation does not address any of the questions of a sensitive nature as described above.

12. Provide estimates of the hour burden of the collection of information.

See attached spreadsheet. This information is based on the accumulated experience of RD staff working with the applicants since both RD NEPA regulations were first promulgated in 1984 and an analysis of recent data collected from respondents noted in Question 8. The estimated total number of responses is 3,712 and total burden hours are 410,050.

The estimated annual number of respondents that collect environmental information and data for loans and grants for single family housing, multi-family housing, community facilities, business, water and waste disposal, electric, and telecommunications programs is estimated to be 1,902.

The applicants' time required to collect the required information varies with the complexity of the various proposals being put forward. The response time is expected to range between 80 and 2200 hours, with almost 70% of applications numbering 80 hours or less per application.

The dollar amounts used for the wage grad come from mean wages from the Bureau of Labor Statistics, May 2014 National Occupational Employment and Wage Estimates United States (http://www.bls.gov/oes/current/oes_nat.htm), multiplied by a factor of 1.4 to account for overhead and administrative expenses. Mean wages by occupation for the following classes: Secretaries and Administrative Assistants (\$26.08/old - \$25.42); Conservation Scientist (\$43.36/old - \$42.80); Engineer/Architect (average between Env. Eng at \$41.51 and Architect at \$38.70 = \$40.11 = \$56.15/old - \$61.22). The annual total cost to respondents calculates to \$17,907,846.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no capital or operation and maintenance start-up costs.

14. Provide estimates of annualized cost to the Federal Government.

The annualized cost to the Federal Government is estimated to be \$6,536,414. This cost was developed by estimating the number of hours that a RD employee, at a grade level 12, step 5, (2015 OPM base salary (\$41.48) + burden rate of 36.3% = \$56.54) would spend in completing the required environmental reviews. The costs will vary between RD and RUS. RUS reviews are assumed to be at a higher grade, GS-13, step 5 (2015 OPM base salary (\$49.32) + burden rate of 36.3% = \$67.22), and involve more hours for reviews. Clerical support was also factored in. These figures are shown below.

CEs are the most common type of environmental review; EAs are the next most common type and will be reviewed for adequacy based upon the applicant information provided in 7 CFR §§ 1970.54/55 and 1970.101. EISs are the least common NEPA document and will be jointly prepared or adopted whenever possible, where other Federal agencies involved or have undertaken analyses of applicants' related actions.

The use of the three Exhibits described in Question 2 saves RD staff hours by directing applicants to provide the most pertinent and focused information and data during the planning and design phase of their proposals.

Type of Environmental Review	Number of Estimated Reviews	Hours for Agency to Complete Review	Hourly Rate (burdened)	Total Cost to Agency
Clerical support	100	1	\$24.58*	\$2,458
RHS/RBS Categorical Exclusions	804	12	\$56.54**	\$545,498
RUS Categorical Exclusions	1098	24	\$67.22***	\$1,771,381
RHS/RBS Environmental Assessments	280	24	\$56.54**	\$379,949
RUS EAs	613	40	\$67.22***	\$1,648,234
RUS EIS	2	240	\$67.22***	\$2,168,894
Travel				\$20,000
Total				\$6,536,414
*GS-3/5				
**GS-12/5				
***GS-13/5				

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.

This is a new package combining the environmental policies and procedures of RBS/RHS and RUS. Since the proposed rule, the final rule estimated number of responses decreased from 4,954 to 3,712. However, total burden hours increased from 262,923 to 410,050 because the estimated response time range increased from between 32 and 2,200 hours to 80 and 2,200 hours.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

All comments will become a matter of public record.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

These forms are used in other Rural Development information collections; therefore, it is not practical to include an OMB expiration date because of the different expiration dates for each collection. RD is seeking approval to not display the OMB expiration date on these forms.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-1.

There are no exceptions requested.

19. How is the information collection related to the Service Center Initiative (SCI)? Will the information collection be part of the one stop shopping concept?

Under the Service Center Initiative, local RD offices are located at USDA Service Centers. Applicants interested in financial assistance from RD will be able to obtain information and environmental guidance documents (Exhibits) on Agency programs from these offices (and State and National Offices and from online resources too). The information required by the Exhibits are specific to applicant proposals and their proposed locations. The applicant is the logical source for this information. Other programs in the Center would not collect the information, unless one of these agencies was also participating in the financing of an applicant's proposal; this is unlikely due to the different programs and eligible applicants of the different SCI agencies. Other agencies in the center, such as NRCS, may be an important source for the required information used by RD officials in evaluating the environmental implications of agency actions.