



Two for the Price of One: Integration of NEPA and NHPA Procedures

Project # 12-250

Background:

The National Historic Preservation Act (NHPA) of 1966 established a national policy to protect and preserve the historical and archaeological sites in the United States. It required federal agencies to consider the historic importance of properties under their administration. The National Environment Policy Act (NEPA) required that federal agencies must consider the effects of their actions on the quality of the human environment before making any decision. In recent years, the Advisory Council for Historic Preservation has requested federal agencies to streamline and merge/coordinate their environmental and cultural resources impact assessment processes. While these statements have been endorsed by federal land management agencies, minimal guidance on how to proceed has been made available for use. The result is that in the absence of specific approved guidance, the internal regulations of most services do not easily allow this deviation from normal procedures.

Objective:

To review existing installation NHPA and NEPA procedures and documents and evaluate them for (a) steps that worked (b) processes that did not, and (c) provide recommendations for procedures which might be combined for more efficiency.

Summary of Approach:

A review was conducted of procedural documents, management plans, and environmental assessments (EAs) for an Army installation, an Air Force Base, and a Naval Station, all within Illinois. Substantive EISs prepared by two Army installations outside Illinois which deliberately set out to combine the two procedures were also examined to provide greater depth in the analysis.

Sources from the US Forest Service, US Fish and Wildlife Service, and Bureau of Land Management were mined for examples which may shed light on combining the two processes.

We also reviewed the CEQ-ACHP handbook “NEPA and NHPA- A Handbook for Integrating NEPA and Section 106”. From reviewing case studies and the handbook, this project’s authors propose best practices for managers to coordinate, integrate, and potentially consolidate their NEPA and NHPA processes.

Results:

Each of the documents reviewed appeared to represent good coverage of biophysical and cultural



Sampson Street Bridge at Naval Station Great Lakes—the subject of an assessment examined for this report

considerations appropriate to the projects and the settings. The three Illinois locations executed the NEPA and NHPA processes separately but achieved NHPA compliance through inclusion of cultural resources, combined with documentation showing that coordination with the SHPO had been accomplished before a decision was announced. At one location however, all recent representative actions under NEPA were so minor that they were classed as categorical exclusions. These actions largely involved maintenance or improvements of buildings in a Historic District. Each action, however, was determined to be an “undertaking” under NHPA and required coordination with the SHPO (or was covered by an existing MOA).

Benefit:

All installation staff reviewed were completing the required coordination under NHPA and NEPA, but normally did not combine review processes. Those which did so had intentionally sought out the opportunity, although it was not required by any regulation.

Accomplishments:

A set of procedures for integration of NEPA and NHPA that brought together key points from DoD installations, CEQ-ACHP handbook, and other Federal agencies. These recommended procedures can be used as guidance from which each service may develop its own procedures that most effectively combines mission with actions being proposed.

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