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Nomination Received by Council on Environmental Quality, Executive Office of the President
For the CEQ NEPA Pilot Project Program
http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/nepa-pilot-project-nominations

PART I. NOMINATOR

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Organization:	Office of the Deputy Assistant Secretary of the Army
Project Title:	[No Title Submitted]
Submitted by:	Federal Agency
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PART II. SHORT ANSWERS

I. What Federal agency or agencies will be involved in this pilot project?

Headquarters, Department of the Army (HQDA) with NEPA support from the US Army Environmental Command (USAEC), and legal support from the US Army Legal Services Agency (USALSA), and 17 Army installations.

II. What is the Federal action to which this NEPA pilot project applies?

The federal action was the Growth and Transformation of the US Army which had several component actions. It included the increase of 74,200 soldiers, moving units from Europe and Korea to Continental US (nearly ¼ of the total Army), modernizing ranges and training capability, and fielding many new pieces of combat equipment. In 2004 the US Army began a major modernization program of constructing potentially up to 300 new and upgraded Vietnam era firing ranges. By 2005, the Army was faced with stationing 6 new Infantry Brigades, reorganizing and stationing nearly 800 other Army units, and a major construction program to support all this activity. During this period the Army was also fielding many new pieces of combat equipment impacting training land and air space. This major Transformation and growth of the Army in a very short period of time required a re-evaluation of supporting NEPA processes with a goal of reducing production time, cost, and legal vulnerability while increasing public participation and agency disclosure. The Army leadership was convinced early in the process that the information from the NEPA process would help improve the stationing decision-making process, increase the sustainability of the Army installations and lands, and protect valued natural and cultural resources. NEPA is not viewed as simply a regulatory requirement; but also as a valuable piece of the military decision making process.

III. How will this pilot project reduce the costs and time needed to complete the NEPA process?

The Army reduced time and cost through several mechanisms to include: tiering, a structured and comprehensive planning process, and senior officer oversight. The USAEC developed a comprehensive set of new NEPA tools and procedures that reduced the cost of NEPA by nearly 30% and execution timeframes by nearly 50%. This reduction was validated over a 5 year evaluation period.. The Army's new procedures included a very structured early planning process that results in a comprehensive plan to address all environmental issues associated with a project, and guidelines that result in a very focused NEPA analysis. This comprehensive plan and focused guidelines results in more concise documents that take less time to prepare and less

time to review, and therefore cost less.

The Army began with a tiered NEPA approach, preparing a programmatic Army-wide analysis that broadly evaluated environmental impacts of Army stationing at 17 major stationing and training bases. Based on the Stationing Record of Decision, the Army prepared a tiered NEPA document for each installation analyzing exactly how and where to construct new facilities on the installation. The Army Internal Scoping process and resulting "Initial Statement of Work Planning Package" (ISOWPP) is explained in the narrative attached. A major component of the ISOWPP process is the analysis of the Valued Environmental Component (VEC or media area) which resulted in a very focused NEPA analysis document. The Army also implemented a rigorous 4 week review process for each of the various draft and final products of the NEPA process. The combination of early environmental planning, tiered documents, focused analysis, and compressed internal Army review times resulted in more concise NEPA documents that cost less, were faster and easier to prepare and review, and therefore reduced overall NEPA timelines. The Army produced a comprehensive programmatic Stationing EIS for 6 new Combat Brigades, 6 Combat Brigades from overseas, and over 800 other units in 11 months, the supplement for the Army in the Pacific (Hawaii and Alaska) was prepared in 6 months, and 9 major installation EIS level documents in an average 12.5 months, thereby meeting the Army's requirement for stationing and construction. In the process, virtually every major environmental recommendation was implemented in the stationing and construction decision. Links to Army Transformation and Grow the Army environmental analyses may be found at: http://aec.army.mil/usaec/nepa/topics00.html . This was a total Army team effort.

IV. How will this pilot project ensure rigorous environmental protection?

The Army took several steps to ensure environmental protection throughout the Transformation planning process. First, was the early and integrated involvement of Army environmental subject matter experts in planning at the HQDA level. USAEC and USALSA NEPA experts were an integral part of the Army Stationing Team. This ensured that environmental issues were considered as part of the initial planning process, and not a compromise or add on at the end. Early involvement provided enough time to conduct appropriate level of environmental studies and analysis, with feed-back impacting early planning. The Army reached out to the regulatory community for input early in the planning process, and was able to incorporate their input early into the planning process. Senior Army decision makers understood that incorporation of environmental information into decision making increased sustainability of Army installations and reduces future land maintenance and repair cost. The development and use of Army NEPA guidance manuals ensured a consistent analysis approach that had been vetted with Army and regulatory Subject Matter Experts (SMEs). Army installations conducted numerous EIS Public Scoping and Draft Review meetings ensuring comprehensive vetting of plans to ensure environmental concerns were surfaced and addressed. Many of these installations conducted special review sessions with state and federal environmental agencies. Installation leadership met with local government officials, and tribal leaders to ensure their concerns were understood.

V. How will this pilot project improve the quality and transparency of agency decisionmaking?

The Army took several avenues to ensure transparency and public involvement on this project. First, there was considerable media attention on Army Transformation, which was released in conjunction with programmatic NEPA. As part of the NEPA process, the Army met with CEQ officials to discuss the overall NEPA approach to ensure the Army was following the NEPA concepts to include public involvement. For the first tier programmatic document, the announcement of the proposed action and request for comments was advertised in both the Federal Register and USA Today. Documents were placed on a Website for easy public access. Paper Copies and CDs were provided upon request. The Army initiated an automatic email delivery system of Army NEPA documents for subscribers interested in monitoring Army NEPA activities.

For the installation specific tiered down NEPA documents, the local Army organizations also used several outreach approaches to ensure the community was aware of the Army's plans. Installation leadership reached out to community and tribal leaders, and the environmental offices conferred with regulatory agencies. Multiple Public meetings at locations convenient to the affected local community were held for both Scoping and to review the draft EIS. At these meetings, Army SMEs were available to answer questions. During the public meetings, there were numerous methods of making comment offered to the public to include individual comment to a court recorder, verbal comment during an 'Open Mic' session, and written comment. In addition, the Army always provides the public 30 days to comment on the Scope and 45 days on the draft EIS. Both HQ DA and local Army officials attended every public meeting to receive public comments and ensure a clear message was delivered to the HQ DA leadership. By producing shorter and more concise NEPA documents, it was less daunting for the public to read and understand. Transparency was achieved by having public scrutiny at both the Programmatic nation-wide level, and the installation site-specific level EIS.

VI. Will this pilot project develop best practices that can be replicated by other agencies or applied to other Federal actions or programs? Please describe?

Yes. There are several Army NEPA Best Management Practices (BMPs) that can be replicated. The ISOWPP process, described in the attached narrative, has proven to be extremely effective in early planning and scoping. In addition, the Army's process for VEC analysis, included in the ISOWPP process, is tied to our NEPA Guidance Manuals, also described in the attached narrative. This BMP is key to a focused analysis and results in more concise, easier to review, and less expensive documents. A strictly enforced 4 week internal review process also greatly reduces the time needed for NEPA documents. If the federal agency does NEPA for repetitive tasks, and categorical exclusions are inappropriate or inapplicable, preparing standardized Purpose and Need statements will save time and ensure consistency. An example is USAEC's Army Range New Construction NEPA Document Templates, available at: http://aec.army.mil/usaec/nepa/nepadoctemplates.pdf . Similarly, nation-wide programmatic EAs for recurring Federal Activities allow subordinate organizations to tier off these documents and reduce agency wide time and cost, when the use of categorical exclusions is not appropriate or applicable. An example is the Army's programmatic EA for pest management, available at:

http://aec.army.mil/usaec/nepa/ipm_final.pdf .

PART III. PROJECT DESCRIPTION

(See attachment on following page.)

Several innovative NEPA tools are now generally used for NEPA analyses Army-wide.

Initial Scope of Work Planning Package (ISOWPP). The Army's primary NEPA tool in reducing time and cost is the very early environmental involvement in the planning process and the development of the ISOWPP during Army Internal Scoping. This "ISOWPP" is a concise, flexible, and evolutionary document that provides a basic roadmap for the NEPA planning process for a given Army project. The ISOWPP consists of several items: (1) Purpose and Need in bullet format; (2) Proposed Action in bullet format; (3) Alternatives and Screening Criteria; (4) List of existing NEPA documents and other studies and plans that may contain data of benefit to the NEPA analyst; (5) Recommended analysis level for each of the Valued Environmental Components (VECs) discussed below); (6) List of needed studies; (7) Recommended needed consultations; (8) Potential mitigations; (9) Proposed major milestones; (10) Public Participation Plan (such as press releases, number/location/format of Public Scoping and Draft Review meetings, community and regulatory organization outreach efforts); (11)Army Points of Contact; (12) Proponent, Signature Authority, Release Authority; (13) Review of a Notice of Intent Packages; (14) Delegation of Authority Decision. The Army Installation Management Command's NEPA Practices and Procedures circular provides guidance on creating an ISOWPP, as well as an example (available at: http://aec.army.mil/usaec/nepa/imcom-circ-200-10-01.pdf).

Guidance Manuals. The Army produced the 'Quick Look Guide' and the 'NEPA Analysis Guidance Manual' (available on the USAEC website, at: http://aec.army.mil/usaec/nepa/nepa-agm.pdf). The Quick Look Guide (available at: http://aec.army.mil/usaec/nepa/nepa-qlg.pdf) contains lists of 3-7 questions for the initial analysis of each VEC. Utilizing these questions, the analyst can arrive at an early, provisional determination of whether the threshold of significance is exceeded, and thus whether or not additional analysis is required. The NEPA Analysis Guidance Manual provides in-depth guidance to the analyst when the threshold of significance is exceeded.

VEC Analysis. The Valued Environmental Components (VECs) are a standardized list of the major environmental resources that could be impacted by a given project (for example, air quality, airspace cultural resources, T/E species, ect.). VEC analysis is a standardized method for evaluating impacts to each VEC, and provides guidance as to the depth and breadth of the impact analysis for each Valued Environmental Component (VEC) as determined by the Army NEPA Team. A rating of Very Low, Low, Medium and High is assigned to each VEC for each alternative site. Very Low means that it is self evident that this VEC is not germane to this project. The analyst should identify all of the VECs in this category and explain in one short paragraph. Low means the VEC is not relevant to the study but it is not self evident, so the analyst prepares a concise explanation as to why the VEC is not relevant. Medium means it is undetermined if a threshold of significance is exceeded so the analyst uses the Quick Look Guide for this VEC analysis. For High, the analyst will use the NEPA Analysis Guidance Manual. The

analyst should surface any error in the rating level to the rest of the Army NEPA team for guidance. This approach provides a basis for appropriate analysis, ensures consistency across Army NEPA documents, and is the primary tool for ensuring the NEPA analysis is focused, concise, and reduces the size of documentation, amount of time for preparation, and cost.

Streamlined Internal Staffing. The Army established a 4 week review process for various drafts of the EIS and ROD. The process identifies the Army review team. These members are kept informed of the expected arrival dates of documents. Reviewers have 2 weeks to conduct the review, and compile comments for their organization where there are multiple reviewers. The contractor then has one week to compile all of the comments, followed by a 1 week meeting where comments are discussed line by line. This approach greatly reduced the overall time for NEPA document preparation.

Programmatic Environmental Assessments. The Army prepares Army-wide EA on the impacts of new combat vehicles, when appropriate, by Bio-region. The installation can supplement The EA with unique installation information. This ensures a consistent and comprehensive analysis, while reducing the NEPA workload on installation NEPA practitioners.

Additional Categorical Exclusions. The Army is collecting and compiling the information needed to establish additional Categorical Exclusions.

Central Contracting. The USAEC developed a central NEPA which routinely issued in less than a month.

Senior Officer Leadership. Senior officers at HQDA brought visibility necessary to impose discipline on the use of all the NEPA tools.