

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:	HDR
Project Title:	The Installation Development Environmental Assessment (IDEA)
Submitted by:	Member of the Public
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PART II. SHORT ANSWERS

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

"The U.S. Air Force (USAF) Air Mobility Command (AMC) sought to improve the continuing installation development process at each AMC installation by evaluating in a single Environmental Assessment (EA), called the Installation Development EA (IDEA), all actions proposed in that installations approved community of development plans. AMC has prepared an IDEA at each of its installations and is currently preparing the second-generation IDEA at four installations.

An IDEA has also been completed at a U.S. Army Reserve Command installation, and two IDEAs are underway for an Air Force Space Command installation and a Pacific Air Forces installation. The Pacific Air Forces has expressed interest in preparing IDEAs at each of their installations. IDEAs are also being considered by other branches of the Department of Defense and Federal agencies. Since NEPA documents for general or master planning documents at Federal installations and complexes are typically comprehensive in nature, the IDEAs serve as the siting and construction NEPA documents for proposed facility projects. The IDEA process brings together multiple functions and tenants on an installation to plan for and implement actual projects that are often not identified in the installations general or master plan, such as infrastructure projects. This forum allows for collaborative planning among installation stakeholders as an integral subsequent step towards implementing the master plan."

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

"The Proposed Action of an IDEA is to implement an installations approved development plans. Development activities on military installations occur each year to support new and changing missions, military readiness training, overall installation maintenance, and sustainability initiatives. Many approved plans provide direction for land use and development and manage sensitive resources at an installation. Although these plans may have been analyzed in NEPA documents, the Proposed Actions in these plans are often too broad to adequately cover future site-specific NEPA. An IDEA considers installation development projects that are planned or programmed on an installation within a 5-year planning cycle, regardless of proponent or funding source.

Projects in an IDEA are sorted into 1 of 5 categories: demolition, construction, infrastructure improvement, natural resources management, and strategic sustainable

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performance projects. A suite of projects within each category is analyzed; these projects are usually larger in scope or have the potential to impact sensitive resources. By analyzing representative projects, the IDEA provides an upper boundary of anticipated environmental effects within each category. Therefore, in the absence of unique environmental constraints, non-representative projects that are comparable in nature and location but smaller in scope would be expected to have impacts similar to, but less than, those impacts identified for the representative projects."

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

"Historically, USAF installations prepare separate EAs for each proposed development project that cannot be categorically excluded in accordance with the USAFs NEPA-implementing regulations (32 CFR Part 989). This traditional approach can be costly and time-consuming, as well as redundant and inefficient.

AMC estimates that the IDEA approach has saved more than \$20 million since 2007. Direct savings have been achieved by conducting the environmental impact analysis process for foreseeable development projects at each installation into a single, comprehensive document (versus a separate EA for each development project). Direct savings have also been achieved by reducing the workload of personnel reviewing documents for Federal, state, and local agencies. Indirect savings to the USAF have been achieved by improving strategic basing and land use and sustainable installation planning.

For a military installation that prepares several EAs a year, the NEPA process becomes the proverbial last box to be checked, which can result in delays in construction and project implementation. Construction projects are often rushed through the NEPA process in response to unanticipated support and funding for the out-years projects identified in the installations master planning document. An example of this is a Congressional insert for a project included in the Five-Year Development Plan but not near the top of the installations priority list. If the project has been approved for immediate design and build but no EA (or EIS) has been prepared, then the project can go no further until NEPA has been satisfied. The IDEA reduces waiting periods for NEPA compliance when it is time to execute a project. While an IDEA does not provide NEPA documentation for every conceivable project, it does provide sufficient NEPA analyses for approximately 90 percent of an installations planned development projects for the 5-year analysis period. The overall development timeline for an IDEA is similar to a single-project EA. It is intended that an IDEA be updated every 5 years in coordination with an installations master planning cycle. Once a FONSI has been signed for an IDEA, then NEPA has been satisfied for most development projects during that 5-year planning cycle."

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

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"An IDEA is prepared according to CEQ and USAF regulations for implementing NEPA. The affected environment for a broad range of resource areas is presented in detail within and adjacent to installation boundaries. Geographical Information System (GIS) data are used to overlay known environmental or land use constraints (e.g., wetlands, floodplains, sensitive species habitat, munitions quantity-distance safety arcs, environmental restoration program sites), and proposed installation development projects. The analysis in the IDEA includes detailed examination of representative projects within each project category and a cumulative analysis that includes all representative and non-representative projects. Reviews by Federal, state, and local agencies are integrated into the IDEA, as with any other EA, to ensure compliance with applicable environmental laws and regulations.

Preparation of an IDEA at an installation, with the accompanying signed FONSI, is only the first layer of environmental review. When it is time to implement a project, an installation's Environmental Planning Function (EPF), in accordance with the USAF NEPA implementing regulations (32 CFR Part 989), determines whether a proposed project can be categorically excluded from detailed analysis or requires an EA or EIS. If a proposed project was included in the IDEA, then the installation's EPF reviews the impact analysis for that project to ensure that the scope and location as analyzed have not changed substantially. This is the second layer of environmental review. If the analysis is still accurate and a FONSI or FONPA has been signed, the NEPA process is complete and the project can proceed. Non-representative projects in the IDEA without a substantial change in scope or location can be categorically excluded from additional NEPA analysis under USAF Categorical Exclusion (CATEX) A2.3.11 (i.e., actions similar to other actions which have been determined to have an insignificant impact in a similar setting as established in an EIS or an EA resulting in a FONSI). If a proposed project included in the IDEA has changed substantially (e.g., project has been relocated so that it might affect a wetland), then additional NEPA analysis would be required. If a project is proposed that was not included in the IDEA, then the installation's EPF can still use the analysis in the IDEA to determine if use of CATEX A2.3.11 would be appropriate, or if additional NEPA analysis would be required."

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

An IDEA is a true planning document. It identifies all planned and programmed projects that could be implemented within a 5-year cycle and focuses on those projects that are believed to have the greatest potential for environmental impacts and identifies ways to minimize those impacts. The IDEA benefits Federal, state, and local agencies and the general public by providing a comprehensive, fence-to-fence picture of military installation development for the foreseeable future in support of current and future missions, providing a baseline for future analysis, and providing a much improved analysis of cumulative impacts.

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?

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"The IDEA has already been successfully applied at several agencies. USAF AMC has completed IDEAs at 10 installations. Four AMC installations are preparing their second IDEA within 4 years after completion of the first round. Two other USAF Commands Air Force Space Command and Pacific Air Force have begun preparation of IDEAs at Buckley Air Force Base, Colorado, and Bellows Air Force Station, Hawaii, respectively. The U.S. Army has also prepared a document similar to the IDEA that addresses installation development and training activities at Fort Hunter Liggett, California.

The IDEA concept is best applied to military installations or large Federal campuses where multiple land uses exist and EAs (or EISs) are prepared regularly for facility construction and development activities. Missions, land uses, tenants, training needs, and sensitive environmental conditions vary by installation and agency, but basic construction, renovation, demolition, and infrastructure upgrades occur universally. Where past and present EAs have traditionally focused on changes to the built environment, the IDEA can add categories to include proposals for enhancements to the natural environment and sustainability initiatives, including alternative energy and energy and water conservation projects. Since AMC finalized the first IDEA in 2007, the general concept has undergone modifications to tailor the analysis to the specific needs of the command, installation, new initiatives, and responses to new Executive Orders. The USAF is developing the next generation General Plan (which is the master planning tool that guides decisionmakers in the long-range development of an installation and is the foundation for most of the projects analyzed in an IDEA), presently being called the Installation Development Plan. The new plan will be web-based and interactive across Pentagon-level Headquarters USAF Staff, the Major Command, and the installation it supports, and will assist the strategic basing process for future realignments and weapon system bed-downs. The IDEA has the flexibility to accommodate this initiative and support the dynamic changes that are taking place in the USAF. As other Federal agencies with large campuses have similar master planning tools, the IDEA concept is perfectly suited for incorporation into their best practices to achieve the NEPA goals of improved transparency and decisionmaking in a more timely and effective manner."

PART III. PROJECT DESCRIPTION

(See attachment on following page.)

THE INSTALLATION DEVELOPMENT ENVIRONMENTAL ASSESSMENT (IDEA)

Submitted by Brian Hoppy, HDR

The U.S. Air Force (USAF) Air Mobility Command (AMC) initiated the Installation Development Environmental Assessment (IDEA) approach at MacDill Air Force Base (AFB), Florida, in 2005. MacDill AFB is home to the 6th Air Mobility Wing, U.S. Central Command, U.S. Special Operations Command, and numerous other tenants. The installation is situated just south of Tampa, Florida, and is surrounded by Tampa and Hillsborough bays on two sides. Approximately 95 percent of the installation has existing overlapping environmental or land use constraints to development, such as floodplains, wetlands, threatened and endangered species habitat, coastal zone, cultural and historic resources, Environmental Restoration Program sites, airfield infrastructure and safety zones, and munitions quantity-distance safety arcs. Eighty percent of the installation is within the 100-year floodplain. The USAF sought to avoid disturbance in sensitive areas, but avoidance of all construction activities in the 100-year floodplain was unattainable. Significant construction delays were occurring as a result of coordinating the necessary AMC Headquarters-level approvals of individual Environmental Assessments (EAs) and Findings of No Significant Impact (FONSIs)/Findings of No Practicable Alternative (FONPAs) for proposed development projects (the USAF requires a FONPA for projects impacting regulated floodplains, and the FONPA must be signed at the Command Headquarters level). The IDEA approach was initiated to streamline development activities while ensuring thorough environmental resource conservation and compliance with NEPA.

For MacDill AFB, the challenge was the 100-year floodplain. Although the installation has numerous environmental and land use constraints, many can be avoided by careful project siting. The floodplain, however, left only small, noncontiguous areas of land available in the northern portion of the installation available for unconstrained development, and these areas are removed from most existing development on the installation. Therefore, in conjunction with the IDEA, a Floodplain Management Plan was prepared that provided an overview of regulations, an inventory of structures and assets in the floodplain, and guidelines for future development. The Final IDEA at MacDill AFB included numerous projects within the 100-year floodplain that were covered under a single FONSI/FONPA. The FONSI/FONPA was signed in 2007, and the Environmental Planning Function (EPF) at MacDill AFB has successfully used the IDEA to implement numerous installation development activities.

The IDEA provides the flexibility to address installation-specific needs and constraints. Each AMC installation has its own environmental concerns, and each IDEA is tailored to address those concerns. For example, there were several projects that would impact wetlands at Grand Forks AFB, North Dakota. Similar to projects in a regulated floodplain, projects impacting wetlands require a FONPA signed at the Headquarters level. The Grand Forks AFB IDEA, which was completed in 2010, considered alternatives for these projects, identified impacts on wetlands, and provided management requirements and environmental protection measures for wetlands and other waters of the United States. Additional coordination with the U.S. Army Corps of Engineers is occurring, beyond scoping and review of the

IDEA under NEPA, and any necessary permits are being obtained under the Clean Water Act prior to implementing any project that would impact wetlands.

The IDEA approach has been adapted to include other types of development and training activities. For the U.S. Army, the IDEA analyzed installation development activities and the resulting increased training requirements at Fort Hunter Liggett, California; this IDEA was completed in 2010. The first generation of AMC IDEAs was completed in 2007 and 2008, and the second generation is under preparation. The second-generation AMC IDEAs reflect new types of installation development projects as a result of changing Federal and USAF policies. In response to Executive Order 13514 (October 5, 2009), and the increasing awareness of practicing sustainable methods, recent IDEAs highlight alternative energy projects and projects that support energy and water conservation measures.

AMC estimates that the IDEA has saved \$20 million in planning and environmental compliance costs at its installations. The IDEA has saved considerable time and money by reducing document preparation and public agency review time, minimizing the costs of duplicate efforts and production of paper documents, and ensuring the NEPA process is complete before projects receive funding and are ready to begin construction. Federal, state, and local agencies have concurred with the IDEA approach during scoping and agency review periods. In summary, the IDEA demonstrates a more efficient approach to NEPA implementation, particularly for Federal agencies with large existing campuses requiring continual redevelopment.