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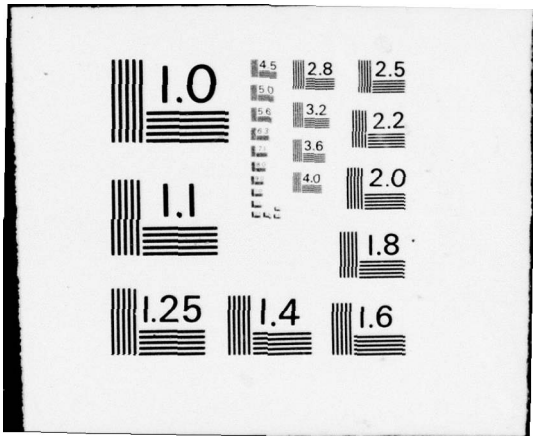
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AN INVESTIGATION OF THE ENVIRONMENTAL ADMINISTRATION POLICIES, PRACTICES, AND ORGANIZATIONS OF THE THREE SERVICES

Casper E. Kramer, Major, USAF
John J. Gratton, Captain, USAF

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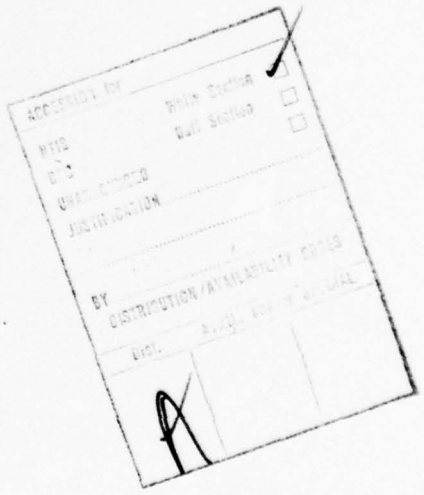

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AN INVESTIGATION OF THE ENVIRONMENTAL ADMINISTRATION POLICIES, PRACTICES, AND ORGANIZATIONS OF THE THREE SERVICES

A Thesis

Presented to the Faculty of the School of Systems and Logistics

of the Air Force Institute of Technology

Air University

In Partial Fulfillment of the Requirements for the

Degree of Master of Science in Facilities Management

By

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September 1976

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This thesis, written by

Major Casper E. Kramer

and

Captain John J. Gratton

has been accepted by the undersigned on behalf of the faculty of the School of Systems and Logistics in partial fulfillment of the requirements for the degree of

MASTER OF SCIENCE IN FACILITIES MANAGEMENT

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Patrick J. Sweeney
COMMITTEE CHAIRMAN

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CHAPTER I

INTRODUCTION

Statement of the Problem

With the signing of the National Environmental Policy Act (NEPA) into law, Executive Orders of the President directed the Department of Defense (DoD) to comply with the laws and policies on environmental protection and control (14; 15; 16). The DoD has initiated an active program to comply with these directives (27:2). The three military services (Air Force, Army, and Navy) have embarked upon individual programs in order to implement the requirements of NEPA (20; 24; 31). Although unilateral approaches to NEPA compliance permit the three services to tailor their programs to their respective needs, such approaches might well have created problems of inefficiency and ineffectiveness. Accordingly, the environmental policies, practices, and organizational structures of the three services should be investigated to identify the existence or nonexistence of any duplicative and/or suboptimal efforts.

Justification

The Directorate of Engineering and Services, Headquarters USAF (PRE) has been designated as the Air Staff office of primary responsibility for pollution abatement

and as the coordinator for all Air Staff activities concerning environmental protection (20:4). The Environmental Planning Division of USAF Engineering and Services (PREV) has formally requested that an exploratory study be performed (10) to compare and contrast the:

1. Administrative policies and practices associated with incorporation of environmental considerations in the decision making process within the three services.

2. Environmental protection organizational structures and configurations of the three services.

3. Educational programs which are used to develop the environmental ethic within the three services.

A cursory comparison of the three services' environmental protection activities revealed that similar yet distinct actions have taken place. All three services have established separate environmental protection organizations within the individual service headquarters (29:14,45,56). Both the Air Force and the Army have embarked upon separate solid waste management research programs (29:36,66). The Army Construction Engineering Research Laboratory has developed the computer aided Environmental Impact Analysis Program (18:5). The Naval Civil Engineering Laboratory developed the automated Naval Environmental Protection Support Service (formerly the Navy Environmental Protection Data Base) to acquire environmental data required for implementing an effective Navy Environmental Protection

Program (5:1). With respect to formal training programs, the Air Force conducts separate environmental protection resident courses directed at providing guidance to Civil Engineers for compliance with environmental objectives (23). The Army has, as a specific part of the instruction, classes on environmental management for their Facilities Engineer (25; 26). The Navy conducts a resident environmental protection course directed at providing guidance to military and civilian managers and planners responsible for ensuring compliance with environmental objectives (30:4200-1).

The need to establish effective and efficient environmental protection programs is given further impetus by the impact of environmental oriented lawsuits filed against the DoD and its subordinate organizations (11:1-3). During the five-year life-span of NEPA, nine lawsuits have been filed against DoD agencies. These nine do not include lawsuits involving the Army Corps of Engineers because the Corps is also connected with civilian construction projects that do not involve DoD installations, and the number of DoD related lawsuits has not been segregated from the total filed with the Corps (12). A recent lawsuit (April 1975) contested a proposed realignment/consolidation of Air Force organizations. This realignment/consolidation would have resulted in the closure of a military installation. The lawsuit charged the Air Force with noncompliance with the socio-economic provisions of NEPA. A judgment was made

which prohibits the Air Force from effecting the proposed move until a detailed environmental impact statement is prepared and filed in accordance with NEPA (34:67). The Second Annual Council on Environmental Quality (CEQ) Report defines the crux of this type of problem: "Federal agencies accustomed to a role of advocacy on behalf of their activities are now required by law to engage in public self-criticism [9:27]."

From this brief review of parallel efforts and court actions, it appears logical to assume that differences among the military services' policies, procedures, and organizational structures could exist. These differences could lead to a loss of efficiency through duplication of efforts, increased program costs, less than optimal familiarity with NEPA requirements, suboptimal environmental assessments, and delays in program accomplishment (1). It therefore should be worthwhile to investigate the individual services' environmental policies, practices, and organizational structures to identify similarities, inconsistencies, and inadequacies in NEPA compliance.

Scope

The organizational structures of the three services have been examined to identify the relative hierarchical levels of the environmental function established in each service. The separate policies have been compared to contrast the differences among the services' attempts to comply

with the intent of NEPA. The procedural flow for approval and planning documentation have been examined to identify the contribution to the planning process by the line and staff agencies for each service. The levels of command which have decision authority for environmental actions have also been identified. Additionally, the formal environmental training programs of the three services have been examined.

Objective

The overall objective of this report is to compare and contrast the major policies, practices, and organizational structures of the three services in the area of environmental protection.

The structure, procedures, and decision levels of each service have been compared from the viewpoint of identified responsibilities and authority for: policy making, accomplishment of Environmental Impact Assessments, accomplishment of Environmental Impact Statements, and final review and approval of any action that affects the environment. This comparison highlighted the areas where duplication of effort exists and determined whether or not all activities are in compliance with the NEPA objectives in accomplishing environmentally related endeavors.

The examination of the formal environmental training programs has compared the training objectives of each service with its individual environmental policy. Also, a

comparison has been made among the formal training programs of the three services for the purpose of recommending the consolidation of training efforts under one entity.

The DoD Interservice Training Review Organization (ITRO) is presently investigating the possibility of consolidating the training programs of the three services. The ITRO was established to review training programs for duplication among the services. ITRO Subgroup 4-A (Construction and Utilities) recommended further analysis of the Air Force and Navy courses in environmental protection (1).

CHAPTER II

BACKGROUND

On 1 January 1970, the President signed the NEPA into law. This law established a national policy for the environment and establishment and Council on Environmental Quality (CEQ) (19:1). The CEQ was created with broad responsibilities to advise the President on all matters affecting the quality of the human environment and to present an annual report on environmental matters to Congress (17:1). Specific duties and functions of the CEQ include (19:11):

1. Reviewing and appraising the various programs and activities of the Federal Government.

2. Developing and recommending to the President national policies to foster and promote the improvement of environmental quality to meet the conservation, social, economic, health, and other requirements and goals of the Nation.

3. Conducting investigations, studies, surveys, research, and analyses relating to ecological systems and environmental quality.

4. Making and furnishing such studies, reports, thereon, and recommendations with respect to matters of policy and legislation as the President may request.

Following the enactment of NEPA, an Executive Order of the President directed that:

> The Federal Government shall provide leadership in protecting and enhancing the quality of the Nation's environment to sustain and enrich human life. Federal agencies shall initiate measures needed to direct their policies, plans and programs so as to meet national environmental goals [15:1].

NEPA requires that any agency of the Federal Government proposing legislation or planning to undertake an action "significantly affecting the quality of the human environment [19:2]" must file an environmental impact statement with the CEQ. These environmental impact statements describe the impact of proposed actions and any unavoidable adverse effects on the environment.

On 30 April 1970, the Council on Environmental Quality issued Interim Guidelines for the preparation of Environmental Impact Statements. These guidelines required that each Federal Agency established internal procedures for implementation of NEPA (6:24). The CEQ subsequently published revised guidelines for the preparation of environmental impact statements (8). These guidelines contain general guidance for determining when an environmental impact statement is required.

On 2 December 1970, the Environmental Protection Agency (EPA) was officially organized as a Federal regulatory agency (35). The EPA consolidated into one agency the major Federal programs dealing with air pollution, water pollution, solid waste disposal, pesticides regulation,

and environmental radiation. Additionally, by virtue of Section 309 of the Clean Air Act, the EPA Administrator was given responsibility for reviewing and commenting on the Environmental Impact Statements relating to proposed Federal activities (36).

In order to comply with the NEPA requirements, Presidential Executive Orders, and CEQ Guidelines, DoD spelled out the environmental policy for use by its component agencies. This policy is as follows:

> A. General. Recognizing that various Department of Defense activities, programs, and technological advances have an impact on the environment; Department of Defense Components shall (1) comply with the spirit as well as the letter of the National Environmental Policy Act and all other Federal environmental laws, executive orders, and regulations, and (2) demonstrate leadership in environmental pollution abatement and enhancement of the environment in a manner consistent with the security interests of the nation.
>
> B. Specific.
>
> 1. It shall be Department of Defense policy for all DoD components at locations within the United States to:
>
> a. Monitor and evaluate all activities on a routine basis and take such measures as necessary to insure compliance with applicable environmental quality standards and environmental performance specifications.
>
> b. Design, use, store, handle, and ultimately dispose of all materials so as to minimize the possibilities for pollution of the environment.
>
> c. Use, whenever feasible, municipal or regional waste collection or disposal systems for the disposal of liquid and solid wastes.
>
> d. Consult with Federal Agencies, as appropriate, concerning development and implementation of techniques and methods for the protection of environmental quality.

e. Cooperate with State and local environmental agencies in accordance with the requirements of OMB Circular A-95, and provide environmentally related information and data regarding DoD facilities and activities that are available or can be obtained readily and are relevant to a determination of compliance with state and local standards or emission limitations. However, DoD components are not required to apply for State and local air and water pollution control permits or licenses for the construction or operation of facilities, including certification of operators, nor are they required to register their facilities if the registration process is, in effect, a permit application that would lead automatically to issuance of a state permit or license. Registration of facilities will be accomplished to the extent necessary to advise state and local authorities of the scope of DoD activities. Operators of Defense pollution control facilities shall meet levels of proficiency consistent with the operator certification requirements applicable to their location.

f. Conduct an integrated multiple-use natural resources, land management program for forests and woodlands, fish and wildlife, open space, soil, water, vegetation, outdoor recreation, natural beauty, and increased public access and non-consumptive utilization on lands under their administration within the framework of DoD Directive 5500.5.

g. Conserve resources, and to the extent practicable, dispose of waste materials by reprocessing, recycling, and reuse.

h. Cooperate to the extent practicable in beneficial community environmental action programs and encourage the establishment of volunteer environmental enhancement programs with appropriate logistical support.

i. Preserve, restore and maintain historic and cultural sites, structures, and objects and protect paleontological and archeological resources under the jurisdiction of the DoD.

j. Make maximum effort, consistent with military requirements, to incorporate environmental pollution prevention measures in the basic design for weapon systems, military material, tests and exercises, and projects for rehabilitation or modification of existing structures and new construction.

2. Department of Defense Components shall, at locations outside the United States, conform at all times

to the environmental quality standards of the host country, international agreements and Status of Forces Agreements. In addition, they shall conform to the extent practicable to the policies of paragraphs A and B. 1. above.

3. When, in the interest of national defense, it is not considered practicable to comply with the foregoing policies, the matter shall be referred to the Assistant Secretary of Defense (Health and Environment) or his designee for resolution [27:2-4].

DoD amplified the responsibilities and procedures of the above-stated policies in DoD Directive 6050.1,

Environmental Considerations in DoD Actions:

It is the continuing policy of the Department of Defense, as a trustee of the environment, to demonstrate leadership and carry out its mission of national security in a manner consistent with national environmental policies and host country environmental standards, laws and policies. All practical means and measures will be used to minimize or avoid adverse environmental consequences and in attaining the objectives of:

1. Providing a safe, healthful, productive and esthetically and culturally pleasing surrounding.

2. Attaining the widest range of beneficial uses of the environment without degradation, risk to health, safety or undesirable and unintended consequences.

3. Preserving important historic, cultural, and natural aspects of our national heritage and maintaining where possible an environment which supports diversity and variety of individual choice.

4. Achieving a balance between resource use and development within the sustained carrying capacity of the ecosystem involved.

5. Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources.

Toward this end, DoD Components shall:

1. Assess at the earliest practical stage in planning process and in all instances prior to the first significant point of decision, the environmental consequences of proposed actions.

2. Review those continuing actions initiated prior to enactment of P.L. 91-190 for which the environmental consequences have not been assessed and ensure that any of the remaining actions are consistent with the provisions of this Directive.

3. Utilize a systematic interdisciplinary approach in planning and decision making.

4. Currently consider along with the economic and technical considerations the unquantifiable environmental amenities and values in planning and decision making.

5. Prepare and process under the criteria contained in enclosures 1 and 2 a detailed environmental impact statement on every recommendation or report on proposals for legislation and other major defense actions which are expected to be environmentally controversial or could cause a significant effect on the quality of the human environment.

6. Study, develop, and describe appropriate alternatives to the recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.

7. Recognize the worldwide and long-range character of environmental problems and, where consistent with national security requirements and the foreign policy of the U.S., lend appropriate support to initiatives, resolutions, and programs designed to maximize international cooperation in anticipating and preventing a decline in the quality of the world human environment.

8. Make available advice and information useful in restoring, maintaining and enhancing the quality of the environment.

9. Utilize ecological information in planning and developing resource oriented projects.

10. Assist the Council on Environmental Quality (CEQ) as required by Presidential Statement on Preparation of Environmental Impact Statements.

11. Refrain from taking any significant implementing steps on administrative action until 90 days has elapsed after filing the draft environmental statement and 30 days has elapsed after filing the final statement, except as provided in enclosure 2, section VIII [28:2,3].

In order to comply with these DoD directives each of the three services published regulations covering departmental policy on environmental control: AFR 19-1, Pollution Abatement and Environmental Quality (20); AR 200-1, Environmental Protection and Enhancement (24); and OPNAV Instruction 6240.3D, Environmental Protection Manual (31). Guidance was also published by the three services on the requirements for environmental impact assessments and statements (21; 24; 31). These publications state the purpose, objectives, and applicability of environmental impact assessments, and provide detailed guidance on the actual preparation of environmental impact statements. The CEQ also published a set of environmental guidelines for Federal agencies (7:1). These guidelines clarify the content of environmental impact statements, the types of impacts to be covered, points to be discussed, the extent of secondary impacts to be included, appropriate alternatives to evaluate, and requirements for negative declaration decisions. The eight major points to be covered by impact statements are summarized as:

1. A description of the proposed action, a statement of its purpose, and a description of the environmental setting of the project.

2. The relationship of the proposed action to land-use plans, policies, and controls for the affected area.

3. The probable impact of the proposed action on the environment.

4. Alternatives to the proposed action, including those not within the existing authority of the responsible agency.

5. Any probable adverse environmental effects that cannot be avoided.

6. The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity.

7. 'Any irreversible and irretrievable commitments of resources.

8. An indication of what other interests and considerations of Federal policy are thought to offset the adverse environmental effects identified.

These individual policies and general guidelines then became the implementing directives for use by each service component in achieving compliance with the NEPA.

Research Questions

The information presented in the Background and Justification sections of this paper discloses that various questions remain unanswered. This research effort was directed at answering the following questions:

1. What are the major similarities and differences in the policies, organizational structures, and educational programs of the three services with respect to environmental protection?

2. Do the environmental policies of the three services comply with the NEPA objectives?

3. Is there a duplication of effort among the three services with respect to the processing procedures for environmental impact assessments and environmental impact statements?

Methodology

The approach selected to accomplish the objectives of this research effort and to answer the previously stated Research Questions consisted of the following:

1. Obtaining the National Environmental Policy Act, the applicable DoD directives for environmental protection, and the individual regulations of the three services that implement their respective environmental policies.

2. Comparing the environmental policies and practices of the three services; to determine if they conform to the DoD directives; to contrast the differences in the individual efforts; and to identify any areas of duplication.

3. Presenting the environmental organizational structure of each service; to trace the environmental planning function from the service department level to the major command level; to show the relative hierarchy and the advisory staff organizations which support the three services' environmental program; and to contrast observable differences in decision making levels among the services.

4. Reviewing the formal environmental education and training programs of the three services to identify areas of duplication.

5. Summarizing the findings, drawing conclusions, and making recommendations.

Operational Definitions

The definitions for each term are intended to represent the most common usage to establish a common communications baseline. This listing is not a comprehensive coverage of all environmental terms and definitions, just the ones used in this report.

Abatement--the method of reducing the degree of intensity of pollution, also the use of such a method.

Air Pollution--the presence of contaminants in the air in concentrations that prevent the normal dispersive ability of the air and that interfere directly or indirectly with man's health, safety or comfort or with the full use and enjoyment of his property.

Archeological Resources--structures, relics and artifacts which existed prior to the appearance of the white man on the American continent.

Comprehensive Plan--the former Base Master Plan plus the Base Environmental Plan.

Ecological Impact--the total effect of an environmental change, either natural or man-made, on the ecosystem.

Ecology--the science dealing with the interrelationships of living things to one another and to their environment or the study of such interrelationships.

Ecosystem--the interacting system of a biological community and its nonliving environment.

Effectiveness--the degree of compliance with environmental directives.

Efficiency--the accomplishment of environmental objectives with a minimum of effort, expense, or waste.

Environment--the sum of all external conditions and influences affecting the life, development and, ultimately, the survival of an organism.

Environmental Consequences--the results of the misuse or pollution of natural resources.

Environmental Considerations--any planned actions affecting the environment.

Environmental Impact Assessments--initial evaluation analyses to determine whether a proposed action is expected to have a significant impact on the human environment. The determination of whether an environmental impact statement is required is based on the results of the assessment. An evaluation must be made in written form and forwarded to the major command or separate operating agency for review and retention.

Environmental Impact Statements--a document prepared by a Federal agency on the environmental impact of

its proposals for legislation and other major actions significantly affecting the quality of the human environment. Environmental impact statements are used as tools for decision making and are required by the National Environmental Policy Act.

Environmental Pollution--that condition which results from the presence of chemical, physical, or biological agents in the air, water, or soil which so alters the natural environment that an adverse effect is created on human and wildlife health and comfort to the extent of producing loss, impairing recreational opportunity or marring natural beauty.

Environmental Protection--the care exhibited in preserving the quality of the environment.

Environmental Resources--the natural environment (air, water, land, minerals, vegetation).

Noise Pollution--any undesired audible sound.

Organizational Configurations--the process of communication, coordination, and reporting with an organization.

Paleontological Resources--plant and animal fossils from prehistoric forms of life.

Recycling--the process by which waste materials are transformed into new products in such a manner that the original products may lose their identity.

Refuse Reclamation--the process of converting solid waste to saleable products. For example, the composting of organic solid waste yields a saleable soil conditioner.

Solid Waste Disposal--the ultimate disposition of refuse that cannot be salvaged or recycled.

Suboptimal Reports--the accomplishments of programs below the accepted level of quality or performance.

Water Pollution--the addition of sewage, industrial wastes or other harmful or objectionable material to water in concentrations or in sufficient quantities to result in measurable degradation of water quality.

CHAPTER III

POLICIES

The Department of Defense has published directives (27; 28) that delineate the requirements of NEPA which the three services must adhere to. In response to these directives, each of the services published regulations or instructions that state their individual policies on environmental protection and quality, and present guidance for the conducting of environmental impact assessments and the preparation of environmental impact statements (20; 21; 24; 31).

The three services' policies are presented and investigated for the possibility of noncompliance with NEPA, for nonconformance to the applicable DoD directives, and for duplication of efforts which could result in inefficiency and/or ineffectiveness.

Department of the Air Force

The general Air Force environmental policy is to comply not only with Air Force directives relating to environmental quality, but also with the spirit as well as the letter of the NEPA, all other Federal environmental laws, executive orders, regulations, and with criteria and standards published by the EPA. The intent of state and local pollution abatement laws, regulations, criteria and

standards also apply. Oversea installations are to comply with the environmental pollution standards of general applicability in the host country or jurisdiction concerned and in Status of Forces Agreements. Environmental programs and actions are to be planned and carried out in a manner to avoid adverse effects on the quality of the human environment and they are to be fully coordinated with all agencies concerned, to avoid duplication and insure timely solutions to mutual problems (20:2).

The specific environmental policies of the Air Force are presented in Appendix A of this paper.

The Air Force published AFR 19-2, Environmental Assessments and Statements (21), to implement the provisions of DoD Directive 6050.1 (28). AFR 19-2 establishes policies, assigns responsibilities, and provides guidance for the preparation of environmental assessments and statements. This regulation requires HQ USAF staff offices, major commands, and separate operating agencies to establish and implement procedures to assess the environmental consequences of any proposed action and to use these assessments and statements in the process of making decisions concerning any proposed action. All actions are to be planned, initiated, and carried out in a manner to avoid adverse effects on the quality of the environment, and the environmental consequences and alternatives of such actions are to be evaluated at the earliest stage in the planning process.

Also, continuing actions initiated prior to publication of AFR 19-2 are to be evaluated to insure that they are consistent with the provisions of that regulation. All policies and procedures are to be evaluated for environmental consequences, and formal assessments and environmental statements are to be prepared and processed whenever an evaluation of a proposed action indicates that the resulting action may significantly affect the quality of the human environment or may be highly controversial with regard to environmental impact.

Specific guidance on environmental assessments and statements is provided for the (21:6-13):

1. Evaluation of environmental consequences.

2. Factors to be considered.

3. Types of actions requiring preparation of formal environmental assessments.

4. Actions requiring submittal of environmental statements.

5. Actions not requiring submission of formal assessments and statements.

6. Procedures for processing environmental assessments and statements.

7. Procedures for processing of environmental statements originated by other Federal agencies.

AFR 19-1 and AFR 19-2 establish the overall general and specific policies and procedures for environmental

protection and planning and also establish the requirement for and delineate the responsibilities of the Environmental Protection Committees.

Department of the Army

> It is the Department of the Army's goal to plan, initiate, and carry out all actions and programs to minimize the adverse effects on the quality of the human environment without impairment to the Army's mission. Inherent in this goal is the requirement to achieve the following objectives:
>
> a. Eliminate the discharge of harmful pollutants produced by Army activities.
>
> b. Conserve and wisely use natural and material resources provided for use throughout the Army.
>
> c. Maintain, restore, and enhance the natural and manmade environment in terms of its visual attractiveness and productivity.
>
> d. Demonstrate initiative and leadership in the formulation and execution of a program that contributes to the national goal of preserving and enhancing the environment [24:1-2].

Specific Army environmental policies and objectives are included in Appendix B of this paper.

Environmental impact assessments and statements are elaborated upon in chapter two of AR 200-1 (24). This chapter defines the policies and objectives of the Army in environmental considerations and assigns the responsibility for carrying them out. All agencies in the Army are to (24:2-3):

1. Assess at the earliest practical stage in the planning process the environmental consequences of proposed actions.

2. Review those continuing actions initiated prior to enactment of NEPA to ensure that any remaining actions are consistent with the provisions of this chapter.

3. Utilize a systematic interdisciplinary approach in planning and decision making to consider environmental values and amenities concurrently with economic and technical considerations.

4. Prepare and process a detailed EIS on every recommendation which is expected to be environmentally controversial and could cause a significant effect on the quality of human environment.

5. Study, develop, and describe appropriate alternatives to the recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.

Essentially all of the environmental policies, programs, and procedures of the Army are included in AR 200-1.

Department of the Navy

The environmental policy for the Navy is to actively participate in a program and enhance the quality of the environment through strict adherence to all applicable regulatory standards, positive planning and programming actions for controlling pollution caused by Navy facilities and to establish methods to monitor the effectiveness and compliance of such actions (31).

The Navy's policies, objectives, requirements for assessments, and the preparation of Environmental Impact Statements are provided in OPNAVINST 6240.3D (31) which is the Navy environmental protection manual covering environmental policies and considerations.

Specific Navy environmental policies are included in Appendix C of this paper. In addition to the policies enumerated in Appendix C, specific programs, pollution standards, and required actions are elaborated upon throughout the text of OPNAVINST 6240.3D.

The general guidance provided Navy personnel is:

> It is incumbant upon all Navy personnel, military and civilian, to become more innovative and imaginative in finding ways to reduce pollution of our land, air and water. Moreover, some long accepted and routine procedures and practices, although technically legal, may impact the environment and become subjected to external scrutiny and criticism. It is necessary to periodically review practices which may affect the environment and study whether measures can be taken to lessen or eliminate undesirable effects. Actions which do not significantly affect the environment may at times be construed by the public as harmful. In these cases, the Navy must ensure that the facts in each action are made clear to all interested persons, including as appropriate, the general public [31:1-10].

CHAPTER IV

ORGANIZATIONAL STRUCTURE

"The purpose of organizational design is to provide conditions which facilitate optimal attainment of objectives [2:325]." With respect to this definition of organizational purpose, the environmental objectives of the three services should dictate the types of environmental planning organizations they employ. The purpose of this chapter will be to:

a. Display the environmental planning organizations of the three services.

b. Identify the major functions that are performed at selected levels of each organization.

c. Enable a comparison of each service's organization with the environmental objectives as stated in their respective regulations.

The environmental planning organizations as depicted in the following figures (1, 1-1, 1-2, 2-1, 2-2, 3-1, 3-2, and 3-3) have been extracted from informal organization and manning memoranda provided by Headquarters USAF/PREVX. Therefore, these diagrams are not to be construed as the officially approved organizational structures. The structures as presented, however, do display the pertinent functional environmental planning structures as they existed at the time of preparation of the referenced memoranda.

The responsibilities assigned to a specific level of an organization dictate the functional duties that are to be performed by that level. An analysis of the sum total of the functional duties or responsibilities of all organizational levels should provide a résumé of the organization's objectives. Therefore, by examining the organizational structure and functional duties of each services' environmental planning activity, a measure of their ability to comply with respective objectives can be ascertained. In other words, the question, "Are they organized to achieve their objectives?" can be addressed.

The functional duties of selected levels of environmental planning of each service and the related levels of the Department of Defense will be described in order to make the above-described comparison.

Department of Defense

Assistant Secretary of Defense, Installations and Logistics (see Figure 1). This secretariate is responsible for programming, planning, design criteria, and technical review of facilities for the prevention or correction of environmental pollution, and for the enhancement of the environment. This function insures that environmental quality is a consideration in all military construction and the maintenance, repair, and operation of facilities (27:5).

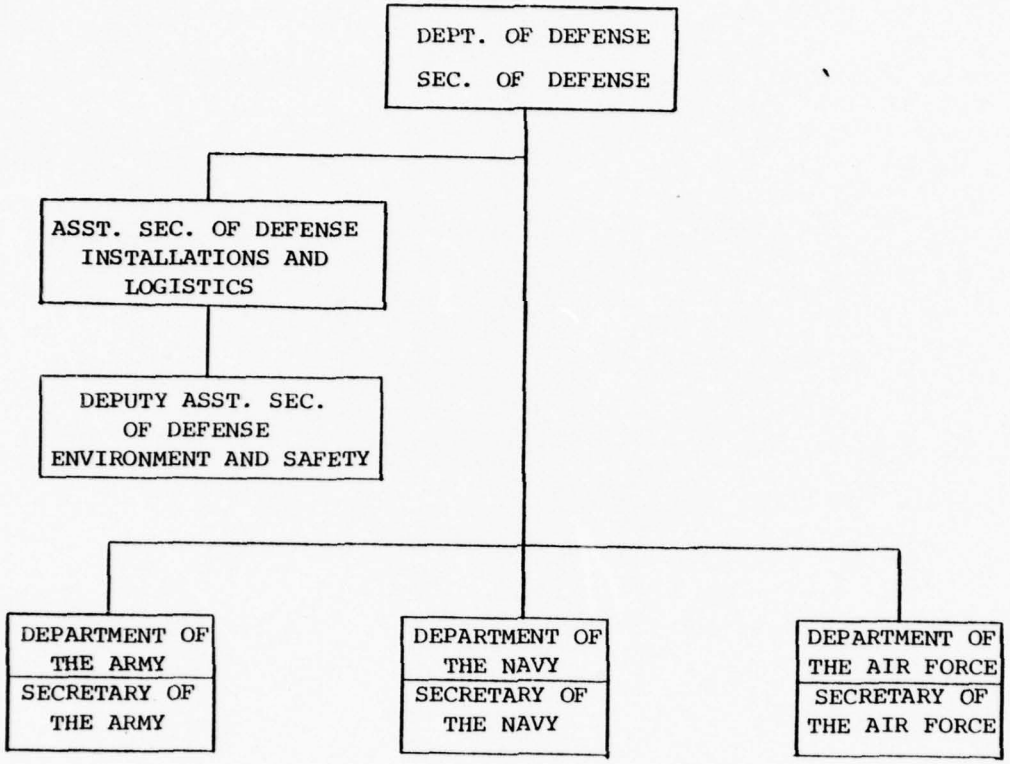


Figure 1. Department of Defense Environmental Planning Organization

Deputy Assistant Secretary of Defense for Environment and Safety (see Figure 1). This secretariate is responsible for monitoring DoD policies for the protection and enhancement of the environment and for recommending policy changes to the Secretary of Defense. Additionally, guidance is provided to the Assistant Secretary of Defense, Installations and Logistics concerning the environmental quality implications of land management and natural resources. Coordination with other Federal agencies involved in environmental quality matters is also provided. Pertinent Executive Branch environmental policies are implemented by this function (27:4).

Secretaries of the Army, Navy, and Air Force (see Figure 1). The three service secretaries are responsible for identifying environmental quality problems, taking necessary action, and implementing DoD environmental policy. They are to insure that environmental consequences of all proposed projects, programs, or actions are assessed early in the decision-making process. They are to insure that the services' Five-Year programs are consistent with DoD environmental policy. Additionally, they are to insure that budget estimates and financial plans include approved programs for providing environmental quality consistent with mission requirements (27:6).

Department of the Air Force

Special Assistant for Environmental Quality (see Figure 1-1). The function of this position is to advise the Assistant Secretary for Installations and Logistics on all safety, energy, and environmental issues. The Special Assistant conducts environmental quality reviews on all proposed major Air Force actions that are subject to NEPA restrictions. This position interfaces with the CEQ, EPA, and the Federal legislative bodies. The Special Assistant coordinates on all environmental actions affecting the Air Force (3).

Environmental Coordinator/Environmental Protection Committee (see Figures 1-1 and 1-2). This function exists at Hq USAF, Majcoms and at base level. It reviews and coordinates on policies and procedures, consistent with organizational level, and solutions to problems concerning environmental protection. Within the Committee's realm of activity, it represents the Air Force in dealing with other DoD agencies, Federal, state, and local governments, and with private parties on environmental protection matters. The committee maintains informal coordination on environmental matters with other Air Force activities. The Committee also undertakes special studies in the support of Air Force environmental needs or to assist in the compilation of Environmental Impact Assessments/Statements. Finally, the committee arranges for the coordinated

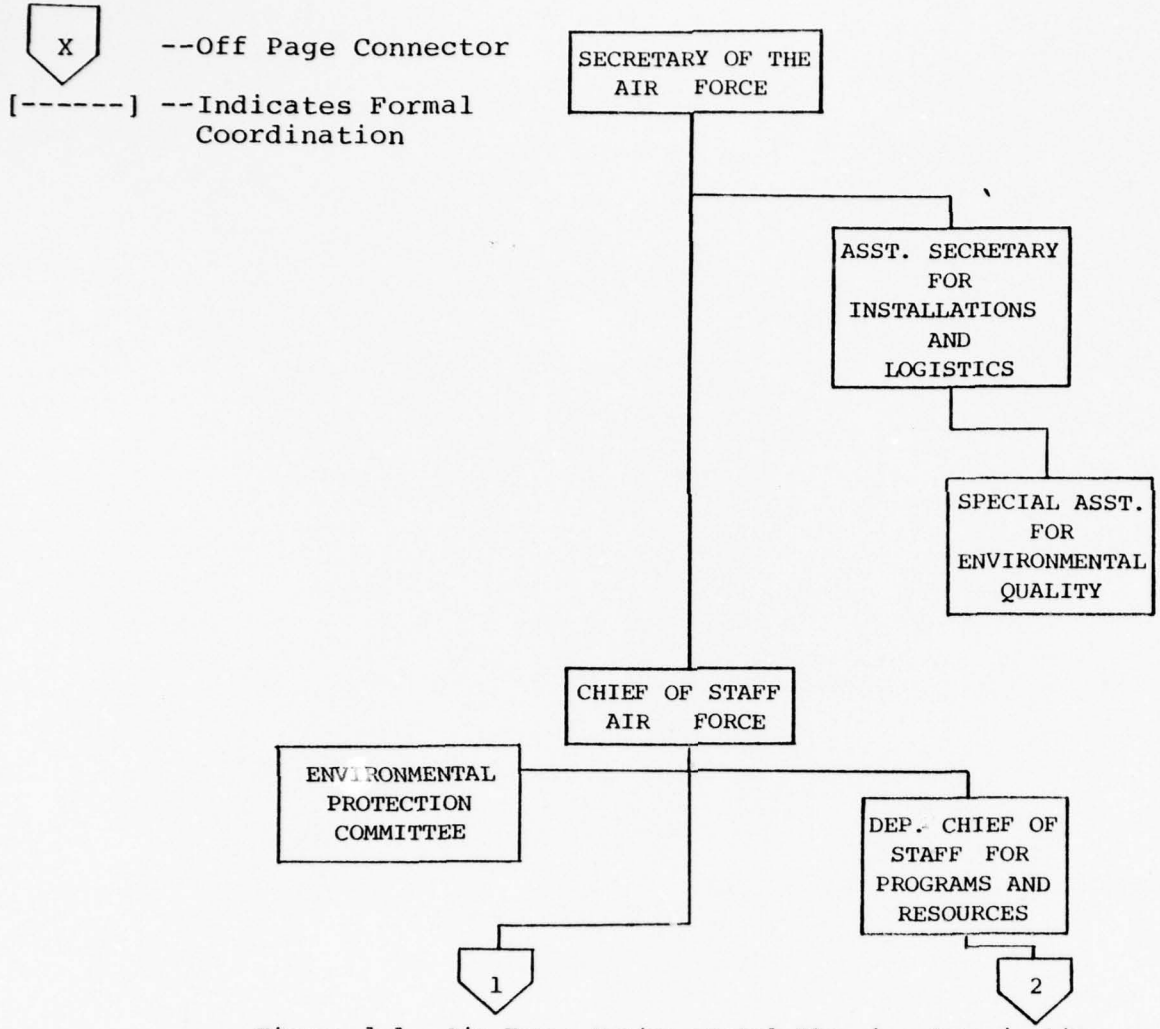


Figure 1-1. Air Force Environmental Planning Organization

accumulation of data needed for the compilation of environmental quality reports as required for Air Force needs (20:4).

Directorate of Engineering and Services (see Figure 1-2). This directorate serves as the Air Staff office of primary responsibility for pollution abatement regardless of funds or program authority. All Air Force actions or policies which affect the protection of the environment must be coordinated through this directorate (20:4).

Environmental Planning Division (see Figure 1-2). This division is responsible for the development of policy and supporting systems through which the Air Force can assess its actions, and identify and evaluate alternatives prior to and throughout the decision-making process. Additionally, this division plans the Comprehensive Program to enhance the environment and develops and manages programs for the protection and use of resources. This function formulates policies, standards and implementing techniques, and develops broad-based managerial plans, procedures and informational material necessary to successfully conduct USAF-wide environmental programs. This division also carries out inter-governmental coordination on environmental matters (22:10).

Environmental Policy and Assessment Branch (see Figure 1-2). This branch receives and screens all

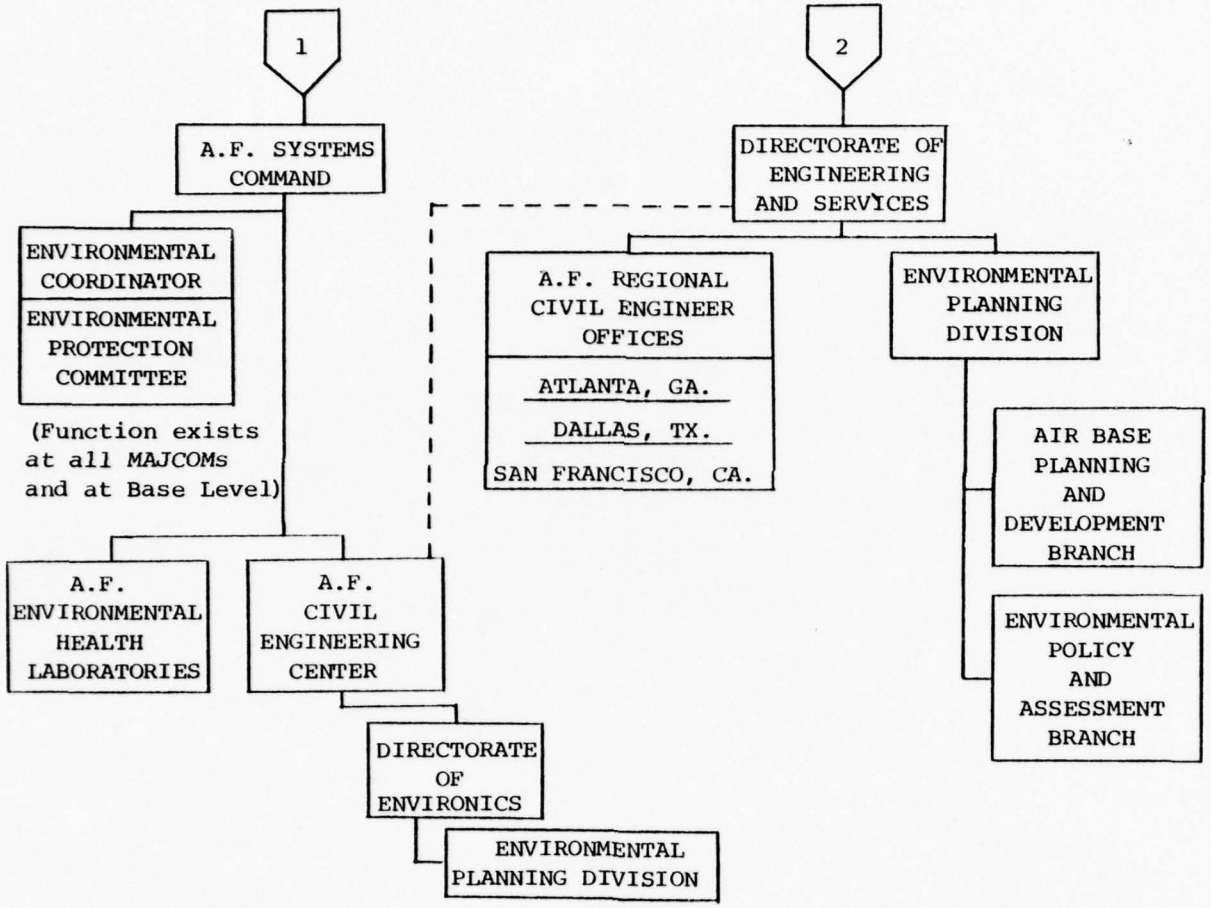


Figure 1-2. Air Force Environmental Planning Organization

environmental reports received by Hq USAF. All candidate, draft, and final Environmental Statements are reviewed for acceptance by this branch. Additionally, this branch formulates environmental policy recommendations for the Environmental Planning Division (21:1).

Air Force Regional Civil Engineer (AFRCE) (see Figure 1-2). This organization evaluates the impact of state and Federal agency environmental planning policies, programs, and actions on Air Force programs and takes action to insure Air Force interests are promoted and protected. The AFRCE conducts Air Force-Federal regional interagency environmental coordination. This function serves as the Air Force liaison and representative to Federal Regional Councils, state legislatures, and state agencies with regard to environmental planning in states where more than one Air Force installation is affected (23).

Air Force Systems Command (see Figure 1-2). This command insures that environmental pollution control is given appropriate consideration in RDT&E projects, programs, and weapon system development. This command also insures that contractor industrial facilities supporting these programs/projects receive a technical review and approval of environmental protection plans and specifications by the EPA, state, and local pollution abatement agencies. The laboratories and centers assigned to this command conduct

research and development on environmental pollution controls and develop techniques for detecting, controlling, and abating environmental pollution from Air Force activities (20:9).

Air Force Environmental Health Laboratories (see Figure 1-2). The laboratories provide Air Force organizations advice and guidance on the establishment of environmental pollution and abatement and monitoring programs. Guidance is also provided on the use and care of the measuring equipment needed for conducting these programs. The laboratories also maintain and operate specialized equipment for the purpose of performing environmental pollution studies at military installations. An electronic data processing capability for analyzing environmental pollution data is also provided as a laboratory service. The laboratories also develop performance specifications for conformance with environmental quality standards (20:8).

Directorate of Environics (see Figure 1-2). This directorate is tasked with conducting research in the assessment of Air Force unique environmental pollution problems in the areas of water and wastewater quality, air resources, ecosystems technology, solid waste, environmental planning, and environmental chemistry. Currently under development is an environmental impact and baseline computer system for use by all Air Force agencies in the preparation of

Environmental Impact Assessments/Statements. This system will include methodology source documents to enable agency utilization (1).

Environmental Planning Division (AFCEC) (see Figure 1-2). This division provides Air Force-wide assistance in the areas of comprehensive planning, natural resources planning, and environmental protection. Assistance is provided by this division in the development of environmental studies, and Environmental Impact Assessments/Statements which are beyond the requesting agencies' capability. This division is also tasked with providing technical reviews of Environmental Impact Statements, and conducting research and development projects to improve the efficiency and quality of the environmental planning process (1).

Department of the Army

Chief of Engineers (see Figure 2-1). The Chief of Engineers (COE) exercises primary Army staff responsibility for directing and coordinating Army environmental activities. This function promulgates environmental regulations for Army Civil Works activities and insures that Army policies and regulations comply with NEPA requirements. The COE insures that the acquisition, construction, operation, and disposal of Army real property is consonant with applicable environmental and pollution laws (24:1-3).

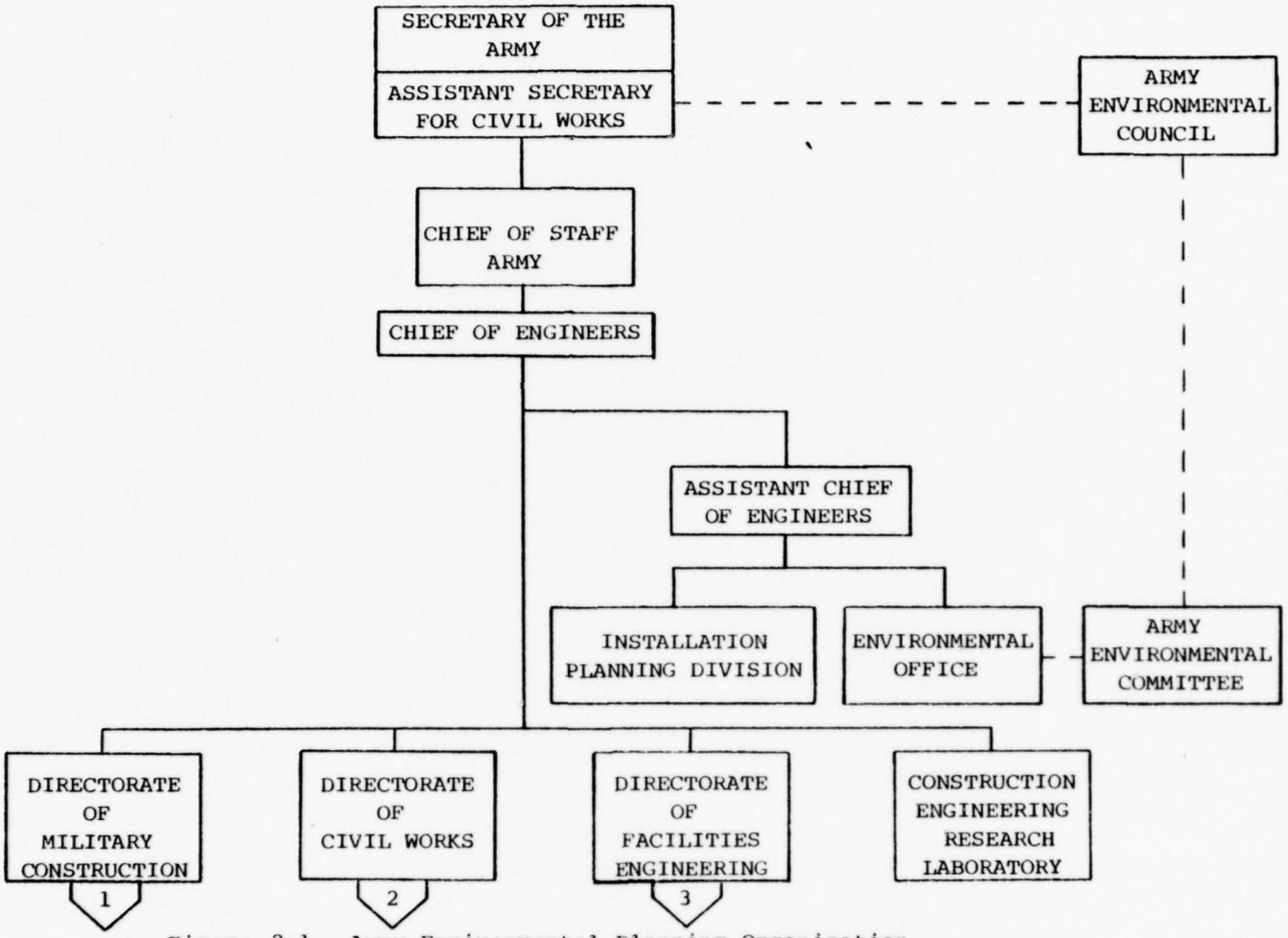


Figure 2-1. Army Environmental Planning Organization

Army Environmental Council (see Figure 2-1). The Council reviews and directs, as necessary, Army environmental policy and programs to insure compliance with NEPA and other applicable Federal laws and regulations. Additionally, the Council provides policy guidance to the Army Secretariate and Army Staff on environmental matters, upon request (24:1-3).

Army Environmental Committee (see Figure 2-1). The Committee assists the Army Environmental Council by maintaining surveillance over on-going environmental programs and activities, and by resolving interagency environmental problems. The Committee also reviews Environmental Impact Statements for exemption from Federal and State standards; provides implementing instructions for the Army Environmental Program; and generates new environmental policies and programs as directed by the Council (24:1-3).

Environmental Office (see Figure 2-1). This office coordinates on all existing and proposed directives, instructions, regulations, and major policy publications generated by Army Staff agencies with respect to environmental matters. Coordination of environmental matters with other Federal agencies is also a function of this office. This office assists the Chief of Engineers in promulgating basic policies, guidance, and regulations for environmental pollution control. The analysis of the environmental

programs and activities of the major Army Commands, Army Reserve, and Army National Guard are analyzed by this office. This office is the Army central point of contact for Pollution Incident Reporting. Preparation of the Army Annual Status Report on Environmental Programs and Activities is also a function of this office. Finally, this office coordinates the preparation of Environmental Impact Statements by all Army staff agencies (24:2-4).

Construction Engineering Research Laboratory (see Figure 2-1). The laboratory provides general technical and engineering assistance on land use management, real property, and facility maintenance and construction associated environmental problems to Army agencies and Commands. Environmental research and development projects are conducted to support the Army environmental program goals. Additionally, assistance is provided to Army Commands and Agencies in the preparation of Environmental Impact Assessments/Statements through the use of the in-house developed Environmental Impact Computer System (EICS) (24:1-3).

Directorate of Civil Works (see Figure 2-2). The activities of this function are excluded from this study because this directorate is not subject to the Department of the Army military environmental regulations. However, since this directorate is under the control of the Chief

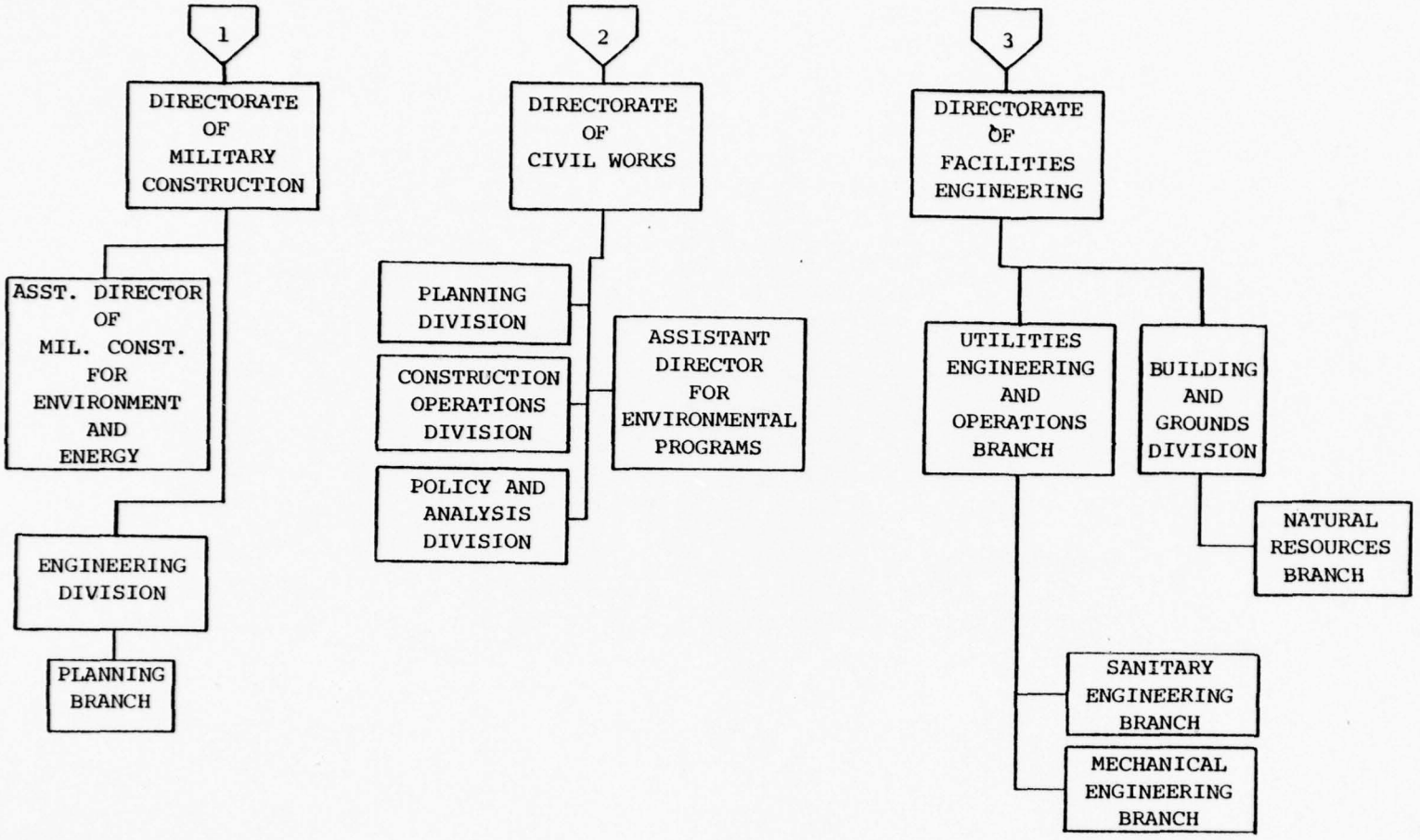


Figure 2-2. Army Environmental Planning Organization

of Engineers, for clarity, its organizational relationship is displayed (24:1-1).

Assistant Director of Military Construction for Environment and Energy (see Figure 2-2). This function provides guidelines and assistance to the Directorate of Military Construction for the selection of proper architectural and engineering techniques to comply with environmental restrictions. The function also provides technical assistance and guidance for the siting, design, and construction of new facilities consistent with environmental requirements. Additionally, it coordinates on activities affecting the preservation, restoration, rehabilitation, and maintenance of historic properties under Army control (24:8-4).

Directorate of Facilities Engineering (see Figure 2-2). This directorate monitors and controls all pollution abatement projects involving Army facilities. Also, this directorate identifies the resources required to effectively execute major command and installation environmental programs. This resource identification is used in programming and budgeting actions by the Army for facilities and other real property (24:10-2).

Department of the Navy

Environmental Protection Division (see Figure 3-1). This division implements Navy policy regarding the protection of the environment, advises on the necessity for

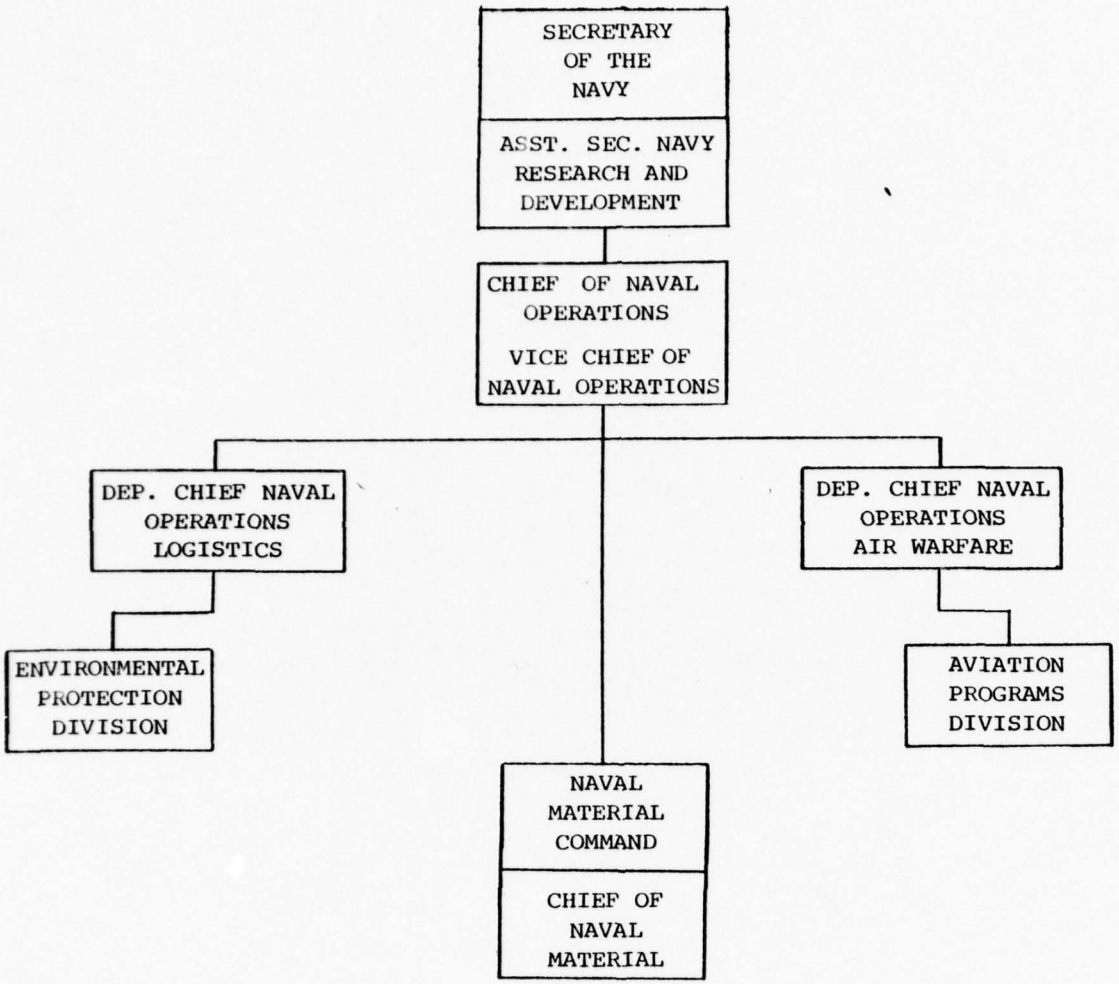


Figure 3-1. Navy Environmental Planning Organization

submitting written assessments and/or candidate impact statements, and reviews environmental impact statements. It serves as a coordinator for the Chief of Naval Operations (CNO) review of candidate statements. Additionally, this division maintains overall CNO coordination with the CEQ, the EPA, the Deputy Assistant Secretary of Defense for Environment and Safety, the Navy Chief of Information, and other DoD and Federal agencies (31:4-6).

Deputy Chief of Naval Material for Operations and Logistics (see Figure 3-2). This deputate provides staff assistance to the Chief of Naval Material for coordinating facilities environmental and industrial resources programs (32).

Facilities, Environmental and Industrial Resources Division (see Figure 3-2). This division interprets and develops policy, and conducts and directs environmental protection programs. It administers the Navy's Environmental Protection Program to prevent and control pollution through planning, design, development, construction, operation, and maintenance as it relates to Naval weapons, shops, aircraft, vehicles, equipment, facilities, and utilities within all components of the Navy (33:III-04-1).

The Naval Environmental Protection Support Service (NEPSS) is a technical support service designed to acquire, collect, assemble, process, and store various types of

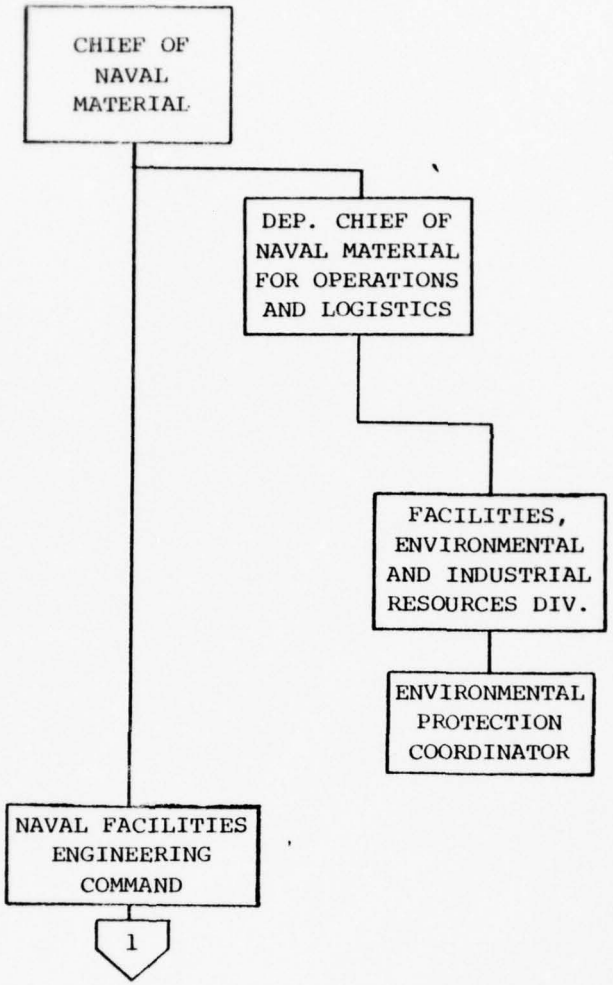


Figure 3-2. Navy Environmental Planning Organization

environmental data required for implementing an effective Navy Environmental Protection Program. It interfaces with all Navy organizations and actively supports all commands by providing environmental data in support of their environmental responsibilities and goals.

The NEPSS consists of a Headquarters Office in the Naval Facilities Engineering Command (NAVFAC), Washington, D.C.; a Navy Environmental Support Office (NESO) at Port Heuneme, California; Regional Environmental Support Offices (RESOs) at Engineering Field Divisions of NAVFAC; and Special Environmental Support Groups for identifying and characterizing pollutants from ships, aircraft, and weapons systems as necessary in support of the NESO (4).

Naval Facilities Engineering Command (see Figure 3-2). This command provides management for Navy natural resources and pollution control programs (32).

Environmental Protection Coordinator (see Figure 3-3). This function serves as the Naval Facilities Engineering Command focal point of contact with other Commands, higher headquarters, and subordinate or lower level units for environmental matters affecting military construction designs, plans, and programs. This function also coordinates on the Navy research and development effort concerning solid waste management and energy conservation/utilization (13).

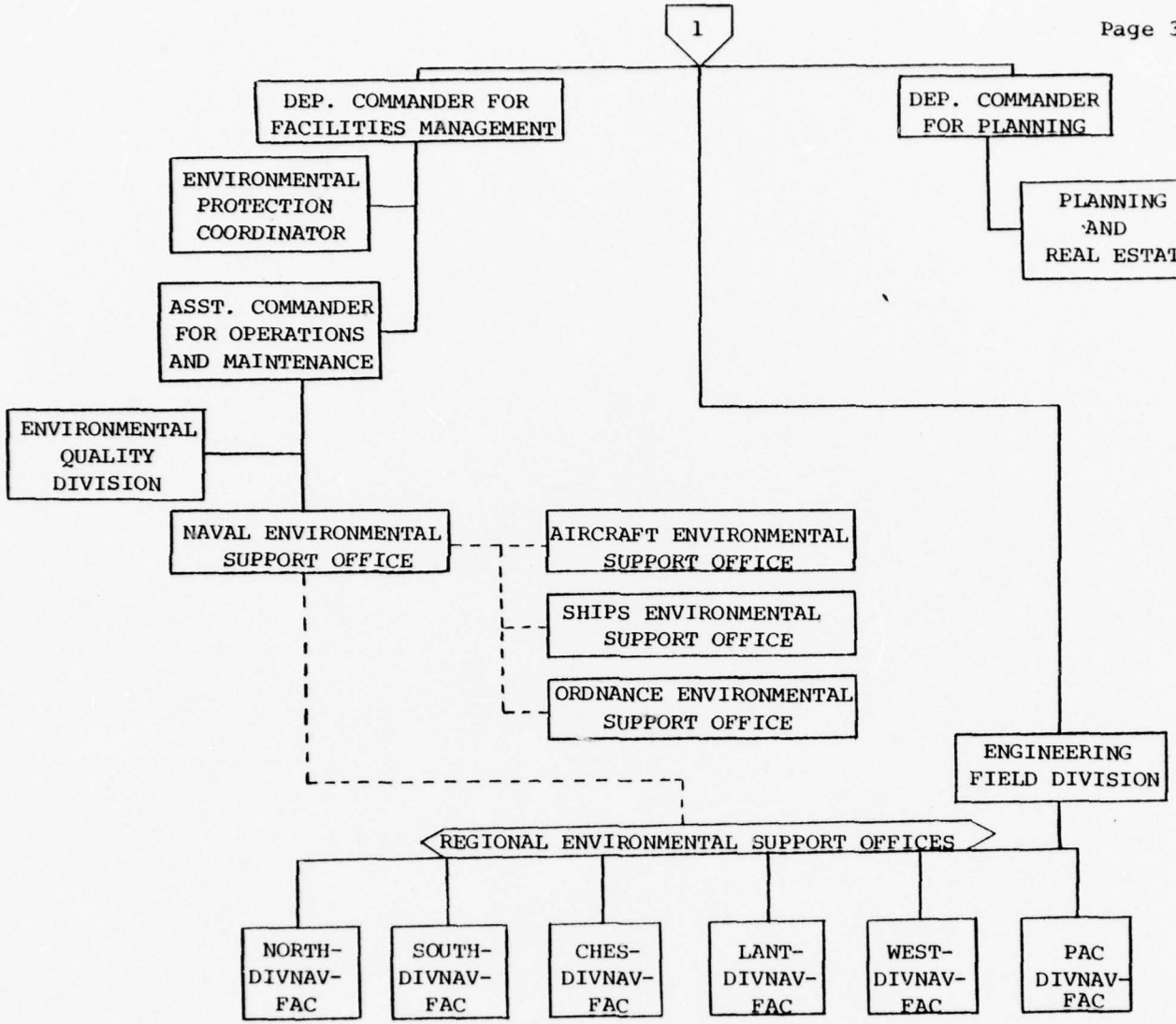


Figure 3-3. Navy Environmental Planning Organization

Environmental Quality Division (see Figure 3-3). This division serves as the overall operating manager of the Navy Environmental Support Service with primary emphasis on planning, policy, and direction. This function is the Navy Ship Waste and Oil Pollution Program manager. It is also involved in all facility pollution abatement programs and provides technical support to the Navy Military Construction Program. This division is involved in the planning, programming, and budgeting functions of all Navy environmental programs (13).

Navy Environmental Support Office (see Figure 3-3). This office is responsible for the effective management, overall planning, program coordination, and technical direction of the Naval Environmental Protection Support Service. This responsibility includes maintaining environmental experts and specialty teams to support Navy commands with special investigation and short-term measurements on environmental problems (31:4211-2).

Aircraft Environmental Support Office (AESO) (see Figure 3-3). This advisory office provides the Naval Air Systems Command technical expertise to the NEPSS for unique aircraft-related pollution matters. The AESO is responsible for identifying and characterizing all forms of environmental pollution resulting from aircraft operations and

related maintenance functions. The AESO is also responsible for executing the overall NEPSS field noise program (4).

Ships Environmental Support Office (SESO) (see Figure 3-3). This naval support organization provides the Naval Sea Systems Command technical expertise to the NEPSS for unique ship-related pollution matters. SESO is responsible for identifying and characterizing gaseous, liquid, and other pollutants from Navy ships (4).

Ordnance Environmental Support Office (OESO) (see Figure 3-3). This organization, located at Indian Head, Maryland, provides the Naval Sea Systems Command technical expertise to the NEPSS for unique weapons system-related pollution matters. The OESO is responsible for identifying and characterizing gaseous, liquid, and other pollutants associated with production, handling, and other ordnance at naval shore establishments (4).

Engineering Field Divisions (see Figure 3-3). These divisions provide technical support to district commandants and field and shore commands on shore facilities for related environmental protection matters, including interface with regulatory agencies (31:4211-2).

Regional Environmental Support Offices (see Figure 3-3). These offices are an organizational part of the various Engineering Field Divisions of the Naval Facilities

Engineering Command. The function of these offices is to assist regional activities in establishing monitoring programs, technically supervise sample collection, arrange for laboratory testing of samples, maintain liaison with regulatory agencies, and provide technical consultant services to commands on environmental matters (31:3-5).

CHAPTER V

EIA/EIS PROCESSING

The Department of Defense in compliance with the NEPA issued instructions for preparing and submitting environmental impact assessments and environmental impact statements (27; 28).

The three services demonstrated leadership in establishing the policies, responsibilities, and procedures in preparing and processing the EIA/EISs to conform to the DoD directives.

The procedures for processing EIA/EISs by the three services are presented for comparison.

Department of the Air Force

1. Procedures for Processing Environmental Assessments: The major commands or separate operating agencies, establish procedures for processing assessments by supplement to this regulation. The supplement should make provisions for processing environmental assessment through host command channels for actions at bases of another command.

2. Procedures for Processing Candidate and Draft Environmental Statements:

a. The candidate environmental statement is prepared, according to this attachment by the using activity, base or command. Submit 20 copies of the statement and one copy of a proposed news release through command channels to HQ USAF/PREV. Command headquarters retains one photo-ready copy, for forwarding to HQ USAF/PREV, if the statement becomes a draft statement.

b. AF/PREV coordinates the candidate environmental statement with the HQ USAF Environmental Protection Committee and SAF/ILE. And, advises the major command or separate operating agency, if the statement will be processed as a draft environmental statement. If the candidate environmental statement is not filed as a draft statement, a negative determination briefly stating the Air Force decision and reasons for this determination, is prepared by AF/PREV and coordinated with SAF/ILE. The major command will be provided a copy of the determination.

c. If AF/PREV, the HQ USAF Environmental Committee, and SAF/ILE, concur that a draft environmental statement should be processed, but believe there should be changes. The candidate environmental statement together with recommended changes is referred to the originator. If the candidate environmental statement is considered adequate, it will be processed.

d. When it has been determined that a draft environmental statement should be processed, AF/PREV prepares a Notice of Intent. This notice will be published in the Federal Register.

e. Upon concurrence from the HQ USAF Environmental Committee and AF/PRE, the candidate environmental statement is sent to the Office of the Secretary of the Air Force, Office of Information for security review according to AFR 190-17.

f. Upon receipt of clearance from the Office for Security Review (SAF/OIS) and approval of the Air Staff and Secretary of the Air Force (SAF/ILE), the candidate environmental statement becomes a draft environmental statement. AF/PREV then informs SAF/ILE of the need for a public hearing. The draft environmental statement is distributed by AF/PREV as follows:

(1) Three copies to OASD(H&E)
(2) Five copies to CEQ
(3) Sufficient number of copies to SAF/LL for distribution to Congress.
(4) One copy to the EPA Washington Office and six copies to the cognizant EPA regional office, as dictated by the geographical location of the proposed action. If the proposed action involves the entire USA or a foreign country, send six copies to EPA Washington Office.
(5) Two copies to the Federal agencies having jurisdiction by law or special expertise, with respect to any environmental impact involved.

(6) Two copies to State and local agencies authorized to develop and enforce environmental standards; if the proposed action effects matter within their jurisdiction. These copies are sent to the appropriate State and regional or metropolitan clearing-houses. According to the procedures in OMB Circular No. A-95, unless the Governor of the State involved has designated some other point of contact for obtaining the State and local agency review.

(7) One copy to each known interested conservation or environmental group or individual.

(8) Three copies of each statement accompanies annual budget estimates to Assistant Secretary of Defense (Comptroller).

(9) When the draft statement is forwarded to the CEQ and other Federal, State and local agencies, AF/PREV and the using agency makes copies available to the public free of charge. Also, copies are forwarded to the Defense Documentation Center. The news release announcing the draft environmental statement if released publicly when the draft statement is sent to other Federal agencies for comment. Generally, the release of the draft statement and its news release are made simultaneously. In the event the news media serving the area of the proposed action fails to carry the news release, the Office of Information is authorized to purchase an advertisement announcing the availability of the statement to the public (AFM 177-102).

(10) After CEQ publishes the action in the Federal Register, 45 days are normally allowed for review and comment. If the agency consulted does not reply within that time, it may be presumed that the agency has no comment, unless a specific request for an extension of time has been made. Extensions up to 15 days will be considered. If deemed necessary, public hearings should be conducted during this review period.

3. Final Statement:

a. A final statement is prepared by the using agency after receipt of review comments provided by other agencies. In many cases the final statement can be prepared by making minor revisions to the draft statement. In other cases, it may be necessary to make major revisions. In either case, an appendix is added to the statement. In each section of the appendix, the basic agency or public correspondence must be reproduced in its entirety; and followed by the Air Force's specific answer and/or reference to the page in the final statement that answers the question. This same procedure is followed, if a public hearing is held.

b. The using agency forwards 15 copies of the final environmental statement. One copy of the news release, and a recommendation on the continuation of the project or action through command channels to HQ USAF/PREV. One copy of the final environmental statement must be photo-ready.

c. Subject to the requirements of safeguarding and disseminating classified information and subject to security review for public release approval, distribution of the final statement is:

(1) One copy to OASD(H&E)
(2) Five copies to the CEQ
(3) Five copies of final statements relating to the annual Air Force Budget authorization bills to SAF/LL. For distribution to the appropriate Congressional committees of the Senate and House of Representatives.
(4) The final statement will be made available to all parties who filed substantive comments on the corresponding draft statement, to members of the public who request copies, and to the Defense Documentation Center.
(5) The news release announcing the final environmental statement, normally is released publicly when the final statement is sent to CEQ. Public notification will be the same as described in paragraph 4f(9) of this attachment.

4. Processing Environmental Statements Originated by Other Federal Agencies:

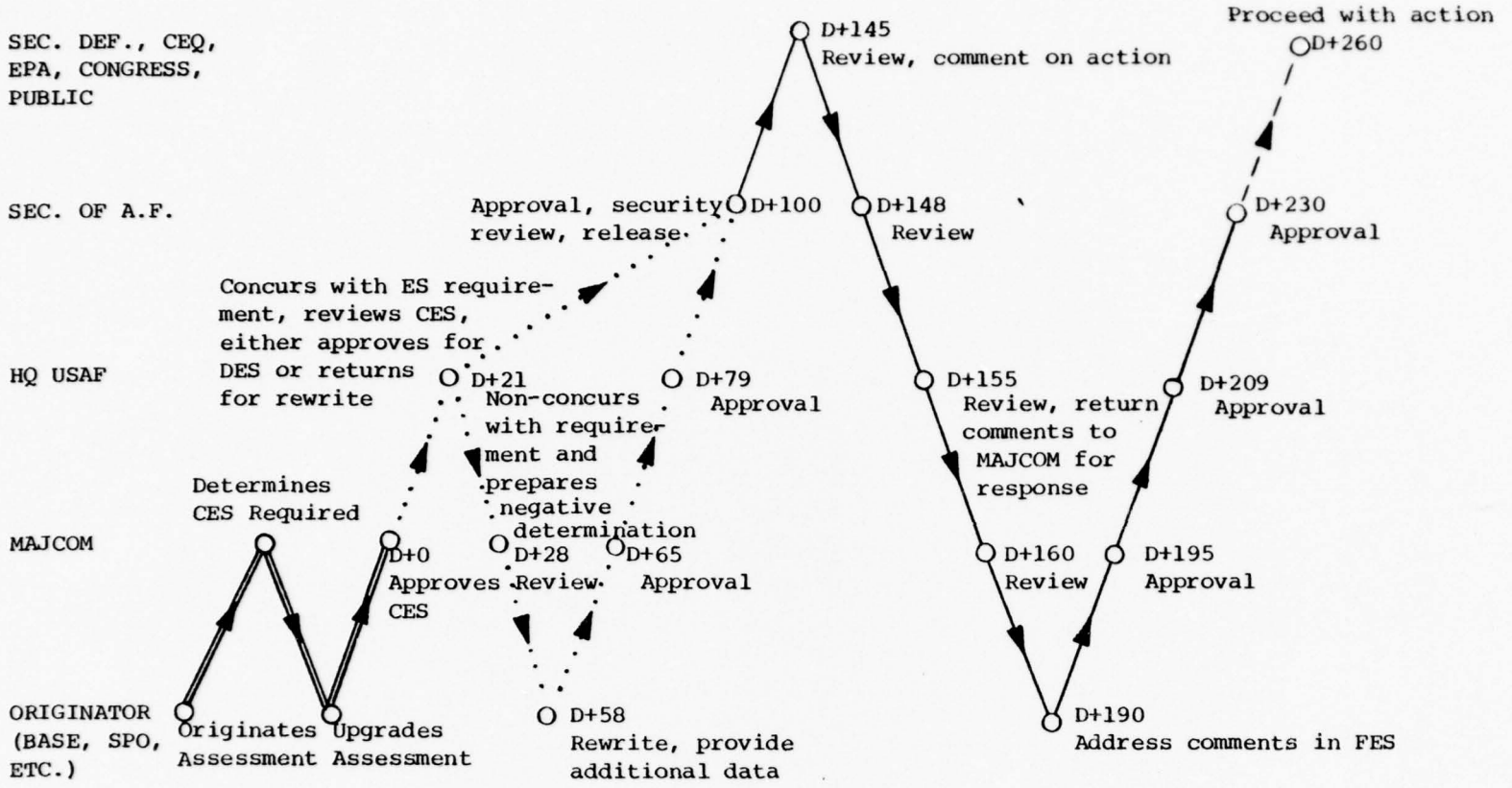
a. The Federal agency originating the environmental statement submits the statement to OASD(H&E).

b. OASD(H&E) refers statements of concern or interest to the Department of the Air Force for review.

c. HQ USAF, after independent review or after referring the statement to the command or activity with the expertise for detailed review and comment, forwards the review report to OASD(H&E).

d. Commands or activities directly receiving environmental statements originated by other Federal agencies forward the statement and their comments on the statement to HQ USAF/PREV [21:11,12,13].

Figure 5-1 is a flowchart of the typical written environmental assessment and statement.



KEY

D is the day the CES first leaves the MAJCOM

_____ Assessment

..... CES-Candidate Environmental Statement

_____ DES-Draft Environmental Statement

------ Final Environmental Statement

Figure 5-1. Flowchart for Processing of Typical Environmental Statement (ES) (21)

Department of the Army

1. Draft Environmental Impact Statements:

a. Statements on administrative actions: The processing of draft EIS's for filing with CEQ and circulating for comment will be accomplished by the HQ DA functional staff proponent agency. The following distribution will be made for draft EIS's:

(1) One (1) copy, OCE (DAEN-ZCE)
(2) One (1) copy, ODUSA
(3) Three (3) copies, OASD(H&E)
(4) Five (5) copies, CEQ
(5) One (1) copy, EPA, Washington, D.C.
(6) Six (6) copies, EPA Regional Office that has administration over the area in which the action will take place.
(7) Two (2) copies minimum, appropriate Federal agencies having jurisdiction by law or special expertise with respect to any environmental impact involved. Figure 2-8 lists the Federal agencies according to their areas primary cognizance.
(8) Two (2) copies, State and local agencies authorized to develop and enforce environmental standards when the proposed action affects matters within their jurisdiction. These copies shall be sent to the appropriate State and regional or metropolitan clearinghouses in accordance with the procedures prescribed in OMB Circular No. A-95 (Revised) of 19 April 1971 (OCE (DAEN-ZCE) should be contacted, when appropriate, to obtain current information).
(9) Two (2) copies to cognizant Committees of the House and Senate in support of legislative proposals not pertaining to budget submissions (also see para b below).
(10) EIS's are to be made available to relevant public commenting entities free of charge or at a few which is not more than the actual cost of reproducing copies required to be sent to Government agencies.
(11) At such time as the draft EIS is forwarded to the CEQ, other Federal, State, and local agencies, it shall be made available to the public (to any organization or individual upon request) free of charge or, upon request, at a fee which is not more than the actual cost of reproducing copies required to be sent to Government agencies.

b. Statements on legislative actions: Three (3) copies of each draft EIS concerned with the annual budget must accompany the budget submission through the

Comptroller review process to OSD. In those instances where it has been determined that a project or activity will not have a significant impact on the environment, such determination must be stated on the project/ activity request. Additional guidance is provided in the Budget Guidance Manual DOD 7110.1-M and DOD instruction 7040.4. It is the responsibility of the HQDA Budget Director to provide required draft EIS's to the appropriate Congressional Committees at the time the legislative request is forwarded to the Congress. Distribution of the draft EIS to other agencies and to the public for comment shall be withheld until the legislative request has been forwarded to the Congress. However, if the draft EIS does not divulge the fiscal year or the monetary amount involved, it can be distributed for comment when approved by the DUSA.

2. Circulation for Comment:

a. Circulation of draft EIS for comment serves as a guard against objective errors or excessive bias. Further, it makes available expert knowledge from other agencies and the public which can assist the Army in its efforts to protect the environment.

b. The HQDA agency requesting review and comments may establish a time limit of not less than 45 days for reply after CEQ publishes notice of the proposed action in the Federal Register. If the agency consulted does not reply within the established time limit, it may be presumed that the agency has no comment to make, unless a specific request for an extension of time has been made. Requests for extensions of time up to 15 days may be granted by DA unless the urgency of the action precludes such as delay. In determining the length of the review period, consideration will be given to magnitude and complexity of the statement and the possible extent of citizen interest.

3. Final EIS:

a. Final EIS's are prepared after receipt of review comments provided by other agencies and the public. In many cases, the final EIS's can be prepared by making minor revisions to the draft EIS and attaching the review comments received from other sources. In other cases, it may be necessary to provide a discussion of problems and objections raised by other Federal, State and local agencies and by private organizations and individuals and the disposition of the issues involved. Along with the comments received, this discussion will be appended to the final text of the EIS.

b. Distribution of the final EIS shall be as follows:

(1) One (1) copy, OCE (DAEN-ZCE).
(2) One (1) copy, ODUSA.
(3) One (1) copy, OASD(H&E).
(4) Five (5) copies, CEQ.
(5) Five (5) copies, appropriate Congressional Committees of the Senate and House of Representatives on final statements relating to Section 412, Public Law 86-149, as amended, or the annual Military Construction Authorization Bill.
(6) One (1) copy to those who filed substantive comments on the corresponding draft statement.

c. Supplementing or amending a draft or final EIS: A proponent agency may at any time supplement or amend a draft or final EIS. This should be accomplished when substantial changes are made in the proposed action or significant new information becomes available concerning its environmental aspects. The proponent agency should consult with OCE (DAEN-ZCE) with respect to the possible need for or desirability of recirculating the EIS.

4. Review of EIS Prepared by Another Federal Agency:

a. EIS's will be referred to the Department of the Army by other Federal agencies for review when a proposed action may affect matters over which DA has jurisdiction by law, or where a proposed action may have environmental effects in an area where DA has been identified to possess special expertise.

b. Comments by the Army on an EIS prepared by another Federal agency will, as a minimum, address the aspect of the action for which the statement was referred. The comments should be organized in a manner consistent with the structure of the draft statement stating the recommended changes and reasons for change. Modification to the proposed action and/or new alternatives that will enhance environmental quality and avoid or minimize adverse environmental impact are appropriately included. In addition, the comments should indicate whether any Army projects are planned that are not identified in the draft EIS and are sufficiently advanced in planning and related environmentally to the proposed action so that a discussion of the environmental interrelationships should be included in the final EIS. Comments should indicate the value of any monitoring of the environmental effects of the proposed project that appear particularly appropriate.

c. DA review and comment on an EIS prepared by another Federal agency will be coordinated by OCE (DAEN-ZCE). When a request for review and comment is received directly by a DA agency other than OCE, that agency shall reply through OCE (DAEN-ZCE) [24:2-12 to 2-15].

The normal time relationships for preparing and processing an EIS are presented in Figure 5-2.

Department of the Navy

1. Processing the Candidate Environmental Impact Statement:

The candidate environmental impact statements identified within the Department of the Navy are to be processed [as illustrated in Figure 5-3], and as follows:

a. The cognizant office, command, or designated activity prepares the candidate environmental statement in accordance with paragraphs 4302 and 4303 of OPNAVINST 6240.3D, and submits fifteen copies to CNO via the chain of command. If the statement concerns proposals for legislation or favorable reports on bills, the CNO will furnish the Chief of Legislative Affairs a copy of the statement and copies of all subsequent correspondence relating thereto. In addition, if the CEIS concerns matters which can be expected to generate considerable public interest or controversy, a copy of the statement and all subsequent correspondence shall be furnished to the Chief of Information by CNO (Op-45).

b. The CNO Environmental Impact Statement Review Panel evaluates the candidate statement concerning the impact of the proposed action on the environment, and CNO (Op-45) advises the major claimant of the concurrence or non-concurrence in regard to submittal as a draft statement.

c. If concurrence applies, CNO (Op-45), with the assistance of the major claimant, prepares a draft environmental impact statement and forwards it to SECNAV for review and filing with the CEQ. CNO can, depending on the specific action under consideration, bypass the Review Panel and recommend the direct filing of a draft statement with the CEQ.

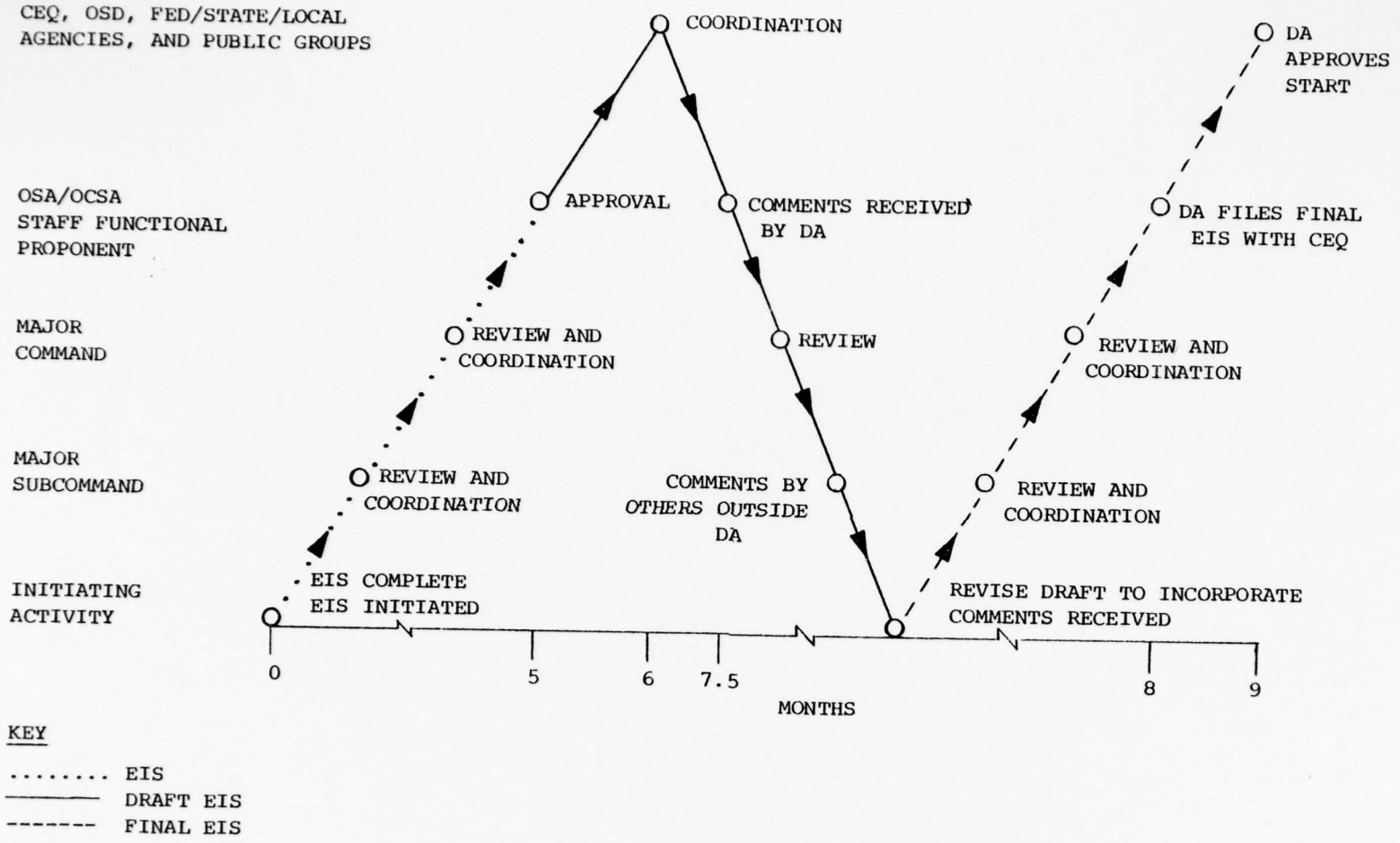


Figure 5-2. Army Normal Time Relationships for Preparing and Processing an EIS (24)

d. If SECNAV does not approve the draft statement, it is returned with appropriate instructions.

e. Once a decision is made to file a statement, the originator is required to provide CNO with additional copies of the draft statement for distribution to other appropriate agencies and the public for comment. The number of copies will vary. However, a minimum of fifty copies is to be made available.

f. CEQ subsequently will publish a notification of filing in the Federal Register. The Friday, following the week in which the date of submission to CEQ occurs, constitutes the first day of the ninety-day period previously noted wherein no irrevocable administrative act shall be taken by the Navy or its representatives.

g. A minimum of forty-five days is allocated for agency/public review. The conduct of public hearings, if deemed necessary by Op-45, should be initiated during this period.

h. After the passage of sixty days from the date of announcement of the draft, a final statement should be filed. All comments received on the draft statement will be forwarded to the originator for incorporation into the final environmental impact statement. After review of the comments and views received from Federal, state, and local agencies, the originator shall make appropriate changes to the statement, particularly addressing all comments made on the draft, and forward twenty-five copies of the final statement, plus one additional copy for each person or agency responding to the DEIS, to CNO for review and processing to SECNAV for subsequent filing with the CEQ. To properly identify applicable comments and the associated Navy response, two additional sections to the statement should be prepared entitled "Agency Comments" and "Navy Response to Agency Comments," respectively. The first section shall reproduce the basic agency correspondence in its entirety, whereas the second section shall only extract the pertinent points of the correspondence, followed by the Navy's answer in sequence.

i. After filing of the final, a period of thirty days must elapse before any new work is initiated. In any case, approval to begin any new work should always be obtained from CNO (Op-45), if not previously documented in the normal conduct of procedures identified.

2. Release of Navy Environmental Impact Assessments to the Public:

As negative declarations are filed quarterly by Op-45 with the CEQ, the question of public release of CEIS(s) prepared is automatically raised. Normally, CEQ would request individual candidate statements depending on their needs. However, the occasion will arise wherein such requests will come direct to the Navy. In such cases, CEIS release is authorized only by CNO (Op-45) and distributed through the cognizant Naval District Commandants. In all other areas wherein Naval Districts are not directly involved, as, for example, in the case of weapons systems developments, CEIS release shall be coordinated by CNO (Op-45). Additionally, environmental impact assessments (EIS's) are not to be released until CNO review and authorization have been effected.

3. Classified Environmental Statements:

The fact that a proposed action is of a classified nature does not relieve the proponent of the action from complying with the requirements of this directive. Environmental statements, both draft and final, shall be prepared, safeguarded, and disseminated in accordance with the requirements applicable to classified information, DoD Regulation 5200.1-R, and OPNAVINST 5510.1D. When feasible, these statements shall be organized in such a manner that classified portions can be included as annexes, so that the unclassified portions can be made available to the public.

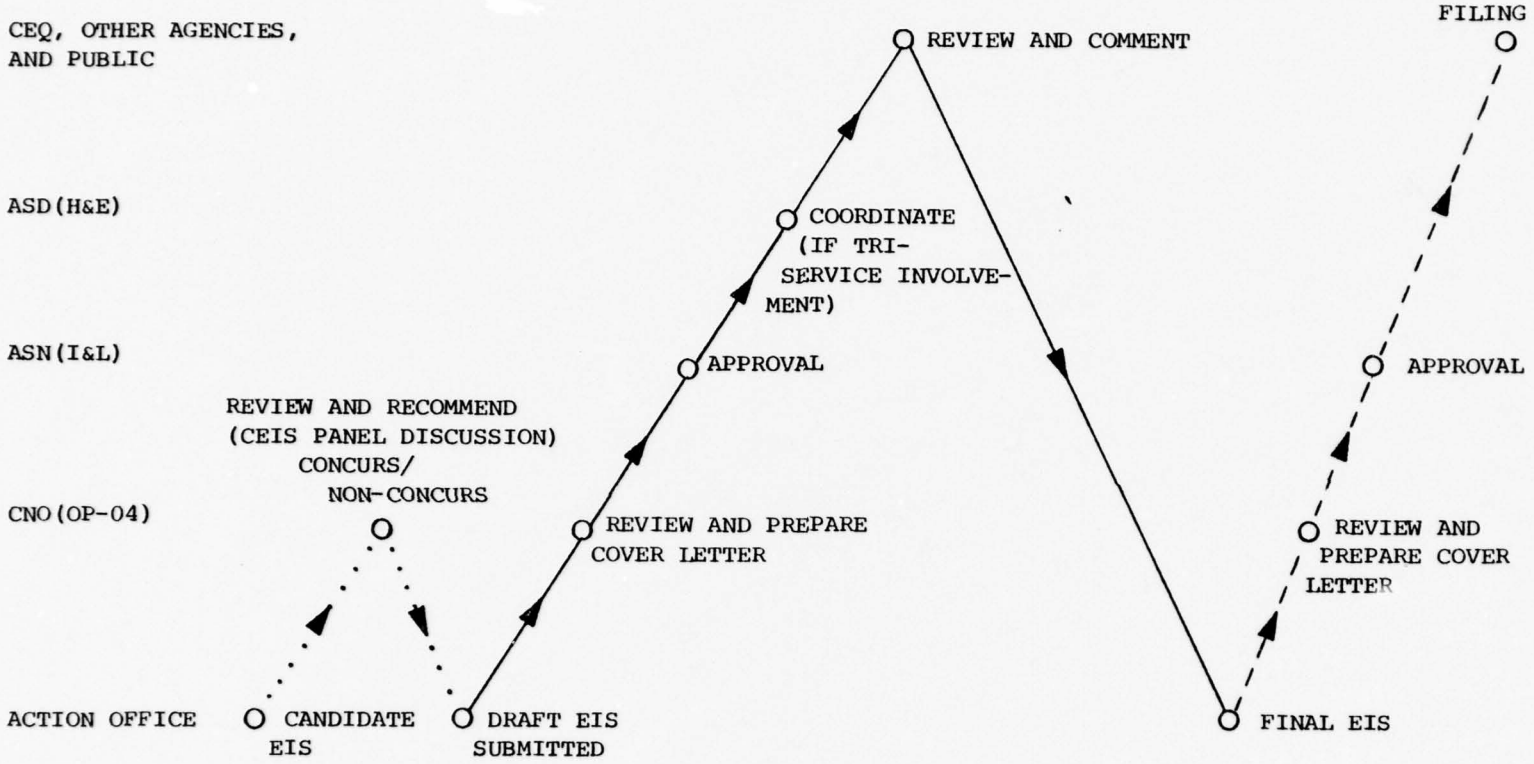
4. Processing Statements Originated by Other Federal Agencies:

Environmental impact statements originated by other Federal agencies are to be processed as follows:

a. The Federal agency originating the impact statement submits the statement to OASD (H&E).

b. OASD (H&E) refers statement of concern or interest to the Department of the Navy to CNO (Op-45) for review.

c. CNO, after independent review, or after referring the statement to the command or activity with the expertise for detailed review and return comments, advises OASD (H&E) of concurrence/non-concurrence with the statement for the Department of the Navy [31:4-19, 4-21,4-22].



KEY

..... Candidate EIS

——— Draft EIS

------ Final EIS

Figure 5-3. Navy Procedure for Processing Environmental Impact Statements (31)

CHAPTER VI

TRAINING

This section is included to present and compare the formal education and training programs of the three services in the area of environmental protection and enhancement

All three services conduct training courses which relate to specific pollution problems in the areas of air, water, noise, and solid waste disposal. However, the intent here is not to show all the training courses and programs that the three services conduct, but to present and elaborate on only those which concern management of environmental programs, major policy actions, and decision-making processes involving environmental planning and considerations.

Department of the Air Force

The Air Force environmental training courses are conducted at the Civil Engineering School, Air Force Institute of Technology, Wright-Patterson AFB, Ohio. There is one management-oriented course conducted by the Air Force: the Environmental Protection Committee Members' Course.

The Environmental Protection Committee Members' Course (23) is a one-week course conducted primarily for

both military and civilian members of the Environmental Protection Committees. This course is directed at providing managers of environmentally related programs a better understanding of:

1. The environmental factors (air, noise, water, solid waste, socio-economic, community factors).

2. The functional responsibilities of the Environmental Protection Committee Members.

3. The NEPA requirements in the decision-making process.

Specifically, this course covers the following areas:

1. NEPA and the USAF Environmental Protection Program.

2. Role of the Environmental Protection Committee.

3. Preparation of Environmental Impact Assessments/Statements.

4. The Base Comprehensive Plan.

5. Major Command Environmental Protection Program.

6. Land use and the environment.

7. Environmental Law, AFR 19-1, AFR 19-2.

8. Socio-economic factors and community relations.

9. Ecological systems and natural resources.

10. Air and water quality, solid waste, and noise pollution.

The Civil Engineering School also conducts a Land Use Planning Course primarily for engineers, programmers, and environmental planners. This is an eight-day course which teaches the student to incorporate environmental laws, assessments, impact analyses, social factors, pollution sources, and protection programs with land use planning principles when preparing the Comprehensive Plan and site plans.

A course for environmental and sanitary engineers is being formulated by the Civil Engineering School. The course will be a two-week course directed at providing the environmental and sanitary engineers current design criteria on water quality and treatment, sewage treatment and disposal, air pollution abatement, and solid waste disposal standards.

Department of the Army

The Army environmental training courses are conducted at the United States Army Logistics Management Center, Fort Lee, Virginia. There are two management-oriented courses available; the Environmental Executive Course and the Environmental Management Course.

The Environmental Executive Course (25) is a one-week course which covers all aspects of environmental awareness and particular emphasis on legislation and court decisions of vital interest to decision makers and their staff members. This course helps to prepare both military and

civilian decision makers by identifying environmental problems that are related to their primary missions. It is specifically geared to the needs of command and staff personnel responsible for approving and executing decisions relating in any way to the protection and enhancement of the environment. The objective is to prevent court actions from arising because of noncompliance with environmental legislation and encourage appropriate responses to executive orders and DoD directives.

Specifically, this course is to teach military commanders and civilian managers the fundamental elements of pollution and their impact on the environment, and to provide administrative personnel responsible for environmental protection and enhancement with knowledge that will enable them to better understand and handle environmental problems by providing:

1. A knowledge of the elements of pollution and their effect on humans and the environment.

2. A knowledge of laws, regulations, and policies relevant to environmental protection.

3. The ability to evaluate environmental impact assessments and statements as a planning tool for any action, activity, or project.

The Environmental Management Course (26) is a two-week course for mid-level management personnel which covers all aspects of the environment to improve and teach the

individual to direct the preparation of comprehensive environmental impact assessments and statements. This course is structured to give each student an understanding in making environmental protection a corollary of primary mission accomplishment. It provides both military and civilian managers a basic, practical understanding of the nature, interrelationship, and significance of major environmental considerations and pollution problems.

Specifically, this course introduces the student to the most recent and significant DoD and Government policies, controls, and developments in the environmental and conservation efforts so that he may apply these factors to better manage resources, assess environmental impacts, and improve the use of natural resources by providing:

1. A knowledge of the significance of pollution impacts on ecosystems in particular and the cumulative effects of pollution in the total environment.

2. An understanding of the legal implications involving environmental legislation, DoD directives, and Army regulations.

3. An enhanced ability to prepare environmental impact assessments and statements.

4. An opportunity to focus on the total concept of the interaction of military activity, local community, pressure groups, and political forces via a computer simulation.

Department of the Navy

The Navy environmental training courses are conducted at the Naval School, Civil Engineer Corps Officers, Port Heuneme, California. There is one management-oriented course conducted by the Navy--the Environmental Protection Course. Formal and correspondence courses are provided for field personnel on an as-needed basis.

The Environmental Protection Course (30), Course No. A-4A-0036, is a one-week course for DoD military officers and civilians in management and planning positions which are connected with decisions affecting the environment and environmentally related actions. This course is directed at providing managers the fundamental concepts of pollution abatement and environmental protection by presenting the background, policies, objectives and requirements of executive orders, public laws, DoD directives, and Navy instructions.

The purpose of this course is to train managers and planners at all levels in the Navy Department, to recognize the causes and effects of pollution in its many forms; to consider the environmental impact of pollution during the decision-making process; to become sensitive to environmentally prudent courses of action; to understand the relationship between careless use of non-renewable natural resources and sources of pollution; to be able to identify

laws and regulations which require Navy compliance in the environmental protection arena.

When the student completes this course, he will be able to:

1. State why the Navy has an Environmental Protection Program.
2. Identify and explain Executive Orders, Public Laws and Navy Instructions which pertain to the Navy's Environmental Protection Program.
3. Identify sources of expertise and assistance available to aid an activity in the environmental protection and pollution battle.
4. Understand the interrelationship between the Environmental Protection Agency and the Navy.
5. Describe the Navy's program for planning, managing and funding the pollution abatement program.
6. Discuss the Navy's Coastal Zone Management Plan and its relationship to individual state coastal zone plans.
7. Describe the Navy's Energy Management Program, and how this program relates to the environmental protection.
8. Explain the difference between an Environmental Impact Assessment and Environmental Impact Statement, when one is required, and what CNO policy and processing procedures are for assessments and statements.
9. Analyze an Environmental Impact Statement by having participated in a workshop exercise.
10. Explain the need for resource conservation, reuse and recycling, and describe an activity's typical recycling program.
11. Outline the Navy's Natural Resources Management Program, and describe a specific case study.
12. Explain some problems of environmental protection during facility construction.
13. List areas where the Navy is involved in RDT&E efforts in the environmental area.
14. Describe the Navy's oil-spill cleanup capability [30:6].

Additionally, the NEPSS, through the Navy Technical Training Center, Norfolk, Virginia, sponsors specialized environmental training courses for activity personnel engaged in sampling, laboratory analysis, and operation of treatment plants on an as-needed basis.

CHAPTER VII

SUMMARY, CONCLUSION, AND RECOMMENDATIONS

The overall area of concern addressed in this thesis is admittedly very broad. However, the strong interrelationships among the individual sub-areas justify this breadth of analysis. In order to cover the substance of the presented material, each individual sub-area will first be summarized separately. Following this summarization, the germane points of each sub-area will be synthesized into conclusions which will be addressed towards answering the Research Questions posed in Chapter II. Finally, based upon the answers to the Research Questions, specific inferences will be drawn and posed in the form of recommended approaches for consideration.

Summary

Chapter III--Policies

In reviewing the policies, as presented in Chapter III, the data presented indicate that the environmental policies of the three services are very similar and appear to follow the letter as well as the intent of the NEPA. The stated policies are quite comprehensive and parallel the guidance and direction set forth in the DoD instructions. Actual compliance with the stated policies could

not be determined from the data gathered for this paper, but the increasing interest in environmental matters and the demonstrated progress made in the preparation of the environmental manuals would indicate sound leadership and conscientious programs in the three services.

The Navy consolidated all environmental policies, requirements, and procedures into one manual, OPNAVINST 6240.3D. This comprehensive manual appears to be well organized, concise, and easy to interpret.

The Army is in the process of consolidating all environmental requirements and actions into one regulation, AR 200-1. The only incomplete section is Chapter 5, Waste Management, but the remainder of the regulation is complete and appears to be the most advanced environmental manual of the three services.

The Air Force environmental policies and responsibilities are spelled out in AFR 19-1, and the requirements for environmental assessments and statements and the procedures for their preparation and submittal are well presented in AFR 19-2. However, additional environmental matters and requirements are included in other Air Force regulations, manuals, pamphlets, and plans.

Chapter IV--Organizational Structures

An analysis of the environmental planning organizational structures results in the following observations:

1. The Air Force environmental planning organization, as represented in this study, appears to be well balanced throughout all levels of command. This balance is accomplished primarily by the required establishment of Environmental Protection Committees at Hq USAF, all MAJCOMs, and all bases. The overall structure appears to be particularly well equipped to insure full coordination with all concerned agencies at all levels of government as well as concerned private organizations. The reorganization of the Air Force Civil Engineering Center to enable an on-going environmental research effort, and the tasking of the Air Force Environmental Health Laboratories to provide both an environmental effect monitoring and analysis function, lends credence to the policy of following the intent as well as the letter of NEPA. The establishment of the Directorate of Engineering and Services as the office of primary responsibility for all Air Force environmental pollution abatement efforts, provides a single point of environmental policy management. This single point concept should assist in obtaining the objective of avoiding duplication and insuring timely solutions to environmental pollution problems. The Air Force environmental planning organization appears to be adequately structured to meet its stated objectives.

2. The Army environmental planning organization also follows the concept of single point management by designating to the Chief of Engineers the primary Army

Staff responsibility for directing and coordinating Army environmental activities. The organization under the Chief of Engineers, however, appears to be directed primarily at environmental matters affecting the acquisition, construction, operation and maintenance, and disposal of Army real property. The Army Environmental Council and the Army Environmental Committee have wide-spread authority over all Army activities which would affect the environment, and have the primary task of generating and establishing Army environmental policies and programs. The Environmental Office serves as a central point of contact for reviewing and coordinating on all proposed Army environmental regulations and directives as well as all environmental reports prepared by Army agencies. Environmental research efforts in support of construction activities are conducted by the Construction Engineering Research Laboratory. The Laboratory, additionally, performs a major role in the accomplishment of Army Environmental Impact Assessments/Statements. The individual Directorates within the Chief of Engineers organization have designated functions concerned with environmental pollutants generated by facility construction and operation. In general, the environmental planning organization, as described in this study, appears to be well structured for accomplishing the Army's major environmental objectives of pollution elimination, resources conservation, aesthetic restoration, and preservation and

enhancement of the environment. The organization, as depicted in this study, however, appears to be heavily weighted toward environmental problems concerning facility construction and operation. Although specific direction as to environmental assessment is directed at all Army Commands and agencies (24:2-5), no additional formal environmental planning organization was uncovered.

3. The Navy environmental planning organization consists of a primary policy making function, the Environmental Protection Division. The Facilities, Environmental, and Industrial Resources Division interprets and administers the Navy's Environmental Protection Program. This program is directed at the entire scope of Naval activities. The Naval Environmental Protection Support Service (NEPSS) is a technical data service designed to implement the above-mentioned program. The management of the NEPSS is centered in the Naval Facilities Engineering Command. Within this command, the Environmental Quality Division serves as the overall manager of the NEPSS. Additionally, unique systems related technical expertise is provided to management of the NEPSS by the Aircraft Environmental Support Office, the Ships Environmental Support Office, and the Ordinance Environmental Support Office. The entire Navy environmental planning organization appears to be designed to provide expertise and active assistance to the individual commands and operating units through the NEPSS. The Navy

environmental planning organization and the function of the NEPSS appear to be adequately designed to achieve the overall Navy environmental objectives of: complying with environmental regulatory standards, controlling pollution, and monitoring regulatory compliance.

Chapter V--EIA/EIS Processing

The eight major points of the CEQ Guidelines and the requirements of DoD Directive 6050.1 for EIA/EIS generation and submittal are adequately covered in each of the three services' environmental manuals (21; 24; 31).

The data presented in Chapter V of this paper indicate that although all three services have separate review channels for processing environmental impact statements, they are very similar and appear to duplicate efforts in determining whether or not environmental statements are required. The Air Force offices that determine if a draft environmental statement should be processed are the HQ USAF Environmental Committee, AF/PREV, and SAF/ILE. The processing of Army draft environmental impact statements for filing with the CEQ and circulating for comment is accomplished by the HQDA functional staff proponent agency. The Navy CNO Environmental Impact Statement Review Panel evaluates the candidate statement concerning the impact of the proposed action on the environment and advises the major claimant of the originator if a draft statement should be submitted.

Chapter VI--Training

In the sub-area of formal training the data presented show that all three services conduct training courses at the management level for environmental planning and protection. These courses appear to be more than adequate to meet the objectives of the NEPA. In addition, all three services provide field training and assistance in the environmental area as required.

The Army provides additional legislative information for the decision makers and staff personnel in the Environmental Executive Course to minimize adverse and court actions.

The Air Force also conducts a Land Use Planning Course for engineers and programmers and a technical environmental design course for environmental and sanitary engineers.

All three services conduct separate technical courses on specific pollution control procedures, but they were not included in the scope of this paper.

All of the environmental training courses are open to DoD personnel and may be attended by personnel from any of the three services.

The DoD Interservice Training Review Organization (ITRO) is currently analyzing this sub-area for the purpose of identifying duplication and determining the need for consolidation.

Conclusion

The Research Questions posed in Chapter II will now be readdressed, and conclusions will be drawn in order to provide answers.

1. What are the major similarities and differences in the policies, organizational structures, and educational programs of the three services with respect to environmental protection?

Policies

The policies of the three services are presented in Appendices A, B, and C of this paper. As previously summarized, the policies are very similar and parallel the DoD directives. The major differences are that the Army and Navy have consolidated environmental matters into one environmental manual, whereas the Air Force presents its environmental policies and procedures in AFR 19-1 and AFR 19-2, and other specific and technical matters in other manuals. The Air Force is the only service that has Environmental Protection Committees at the Headquarters USAF, major commands, and base levels.

Organizational Structures

The Air Force, Army, and Navy are all organized toward achievement of their individual environmental objectives. Their approaches to organization, however, differ significantly. The Air Force appears to have spread the

responsibility for environmental policy and planning throughout the service by the establishment of the Environmental Protection Committee function at all levels of command. The Army appears to have retained the total policy and planning effort at the headquarters level and appears to be organized primarily toward dealing with the pollution aspects of facility construction, maintenance, and operation. In contrast, the Navy has designed the bulk of its organization around the operation of the NEPSS in order to provide active assistance to the commands and operational units in resolving all types of environmental pollution problems.

Educational Programs

The specific formal training programs are presented in Chapter VI of this paper. All three services have management-oriented environmental training courses and offer specific training courses in the more technical areas. The Army conducts a training course for staff-level personnel in their Environmental Executive Course. There appear to be major similarities in the content of the three services' educational programs.

2. Do the environmental policies of the three services comply with the NEPA objectives?

The stated policies of the three services follow the guidance and direction of the DoD instructions which parallel the NEPA objectives. The three services do appear

to follow the letter as well as the intent of the NEPA with increasing interest and conscientious leadership.

3. Is there a duplication of effort among the three services with respect to the processing procedures for environmental impact assessments and environmental impact statements?

From the data presented in Chapter V of this paper, it appears that there is no duplication of effort in determining if specific environmental impact statements are required. However, there would appear to be a redundancy among the three services processing channels. Each of the three services presently has a separate method of processing proposed actions from the originator to the CEQ.

Recommendations

The investigation conducted in writing this thesis leads the authors to believe that certain actions or further investigation could result in improving the environmental programs within DoD. These recommendations are directed primarily at taking what appear to be the best features of all three services' programs and incorporating these features into each individual program, and eliminating dual approaches aimed at achieving the same end result. The authors feel that the following recommendations should receive the attention of the respective services.

1. The authors recommend the Air Force consider consolidating all environmental directives into one

environmental manual. This approach would assist in assuring that affected Air Force personnel comply with all pertinent environmental policies.

2. From the authors' point of view, both the Army and the Navy would benefit from the formal establishment of environmental protection committees at all levels of their respective commands. This approach would possibly strengthen their overall planning organizations and encourage more active participation by all activities.

3. In the authors' estimation, the DoD could benefit from further investigating the possibility of establishing a tri-service organization charged with the responsibility for processing all environmental statements submitted from the major command level of each service. This approach could result in economies of scale through the consolidation of the review and coordination functions of the three services' environmental planning organizations.

4. From the investigation of the three services' formal training programs, and being aware of the ITRO investigation, the authors feel that consideration of the following proposals is warranted.

a. Recommend ITRO consider establishing a consolidated DoD oriented environmental training course, staffed by the three services.

b. Recommend ITRO consider the feasibility of assigning specific training responsibilities to each of

the three services. A possible delineation of these responsibilities would be:

(1) Air Force--air pollution and AICUZ

(2) Army--solid waste and munitions disposal

(3) Navy--water pollution and oil spill prevention/containment

An approach of this nature could result in economics of scale throughout the entire DoD.

5. In the area of automated environmental assessment systems, the authors feel that both the Navy NEPSS and the systems under development by the Army's CERL, are currently outstanding systems. It would appear, however, that DoD could achieve an even higher capability through the consolidation of the best features of each of these systems into one overall DoD system. An approach of this type would enable DoD to provide the same environmental support service to the Air Force, Army, and Navy. The authors, therefore, recommend that DoD seriously consider investigating the feasibility of a consolidated automated environmental support service.

6. Finally, the authors recommend that, as a follow-on to this thesis, investigation be performed to determine the actual degree of compliance by each service with their respective environmental directives.

APPENDICES

APPENDIX A

AIR FORCE ENVIRONMENTAL POLICY

APPENDIX A

AIR FORCE ENVIRONMENTAL POLICY

A. General. Air Force policy is to:

1. Comply not only with Air Force directives relating to environmental quality, but also with the spirit as well as the letter of the National Environmental Policy Act, all other Federal environmental laws, executive orders, regulations, and with criteria and standards published by the Environmental Protection Agency (EPA). The intent of state and local pollution abatement laws, regulations, criteria and standards also apply.

2. Demonstrate leadership (consistent with the security interest of the nation) in preventing, controlling, and abating environmental pollution at Air Force installations, by supporting area pollution-abatement programs of local communities and by accelerating corrective measures to meet established standards and criteria.

3. Assess the environmental consequences of any proposed action in accordance with AFR 19-2 at the earliest practicable stage in the planning process and in all instances before decision.

4. Plan, initiate, and carry out environmental programs and actions in a manner to avoid adverse effects on the quality of the human environment, insofar as practicable, and with appropriate consideration of assigned missions and of economic and technical factors. Specifically consider air and water pollution abatement, noise control, pesticide management, solid waste management, and other environmental enhancement activities.

5. Insure, to the extent practicable, that oversea installations conform to the pollution-abatement policies described in this regulation. As a minimum, operate facilities outside the United States so as to comply with the environmental pollution standards of general applicability in the host country or jurisdictions concerned and in Status of Forces Agreements.

6. Fully coordinate environmental protection matters with all agencies concerned to avoid duplication and insure timely solutions to mutual problems.

7. Comply with the Freedom of Information Act, Office of Management and Budget, Circular A-95, and provide information and advise to those individuals and agencies seeking to improve environmental quality. While complying with these information requirements, discharge fully Air Force responsibilities for safeguarding classified or privileged information as required by law (AFRs 12-30 and 190-12).

8. Insure that the environmental planning process considers both the favorable and adverse comments of experts, concerned public and private organizations, and citizens who support or oppose a proposed agency action.

9. When appropriate, insure that the requirements of the Occupational Safety and Health Act (OSHA), E.O. 11612, and AFR 127-12 receive full consideration along with environmental quality requirements.

B. Specific. Make all practical efforts to:

1. Provide control measures for environmental pollution in designs for new Air Force buildings, facilities, weapon systems, operations, tests, exercises, procedures, and projects for rehabilitation or modification of structures.

2. Provide preventive pollution control by:

(a) Reducing or eliminating waste at the point of generation.

(b) Considering potential environmental pollution control problems when selecting chemical compounds and materials to be used in Air Force operations.

(c) Including pollution abatement as an element in specifications.

3. Obtain presidential exemption for certain facilities from complying with environmental control standards when in the paramount interest of the nation. To exempt the facility, the installation must apply for a waiver through command channels to HQ USAF/PREV, Wash DC 20330. Send an information copy of the request to HQ USAF/SGP, and when Industrial Production Facilities are involved, RDPI. The application must justify the waiver.

4. Dispose of or discharge pollutants in a manner that will not:

(a) expose people to concentrations of any agent (chemical, physical, or geological) hazardous to health.

(b) alter the natural environment so that an adverse effect is created with respect to human health or the quality of life.

(c) result in substantial harm to domestic animals, fish, shellfish, or wildlife.

(d) cause economic loss through damage to plants or crops.

(e) impair recreational opportunity and natural beauty or cause ground water contamination.

5. Insure that contracts for disposal of waste contain provisions which require the disposal method to be in accordance with applicable local, state, and/or Federal criteria and standards. Verify compliance to insure disposal of waste is consistent with applicable standards and criteria.

6. Install facilities or establish procedures to prevent cooling water from increasing stream temperatures above acceptable limits.

7. Store and handle gasoline, jet fuels, and other volatile petroleum distillates or organic liquids in accordance with Federal, State, and local standards.

8. Avoid or minimize the creation of wastes throughout the complete cycle of operations at each facility and, to the extent practicable, dispose of the wastes that are created by reprocessing, recycling, and reuse.

9. Preferentially use municipal or regional waste collection or disposal systems to dispose of wastes from Air Force facilities. When use of such a system is not feasible or appropriate, do whatever is necessary to satisfactorily dispose of such wastes, including the following:

(a) When appropriate, install and operate waste treatment and disposal facilities.

(b) Provide trained manpower, laboratories, and other supporting facilities as appropriate to meet the requirements of issued standards.

(c) Require operators of Air Force pollution-control facilities to meet levels of proficiency consistent with the operator certification requirements of the State in which the facility is located.

10. Insure that all materials (including solid fuels, ashes, petroleum products, and other chemical and biological agents) are developed, used, stored, handled, and ultimately disposed of in such a manner so as to minimize the possibilities for pollution of the environment.

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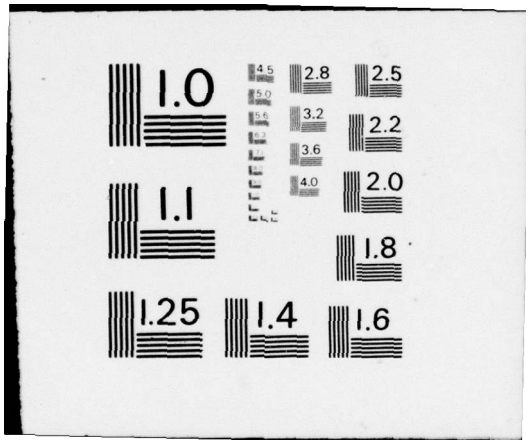
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11. Provide the engineering safeguards (such as dikes, catchment areas, relief vessels) that are necessary to prevent pollution of water by accidental discharge of stored fuels, solvents, oils, and other chemicals.

12. Assure that discharges of radioactivity conform with the applicable rules, regulations, and requirements of the Atomic Energy Commission (and with the policies and guidance of the Environmental Protection Agency) as specified in AFR 160-132 and the 110N Technical Order series.

13. Give priority in the following order when resources to accomplish pollution control are limited:

(a) Situations that constitute a hazard to the health or safety of man.

(b) Situations that are cost effective.

(c) Situations that affect the recreational and esthetic value of our natural resources.

14. Cooperate with state and local environmental agencies and provide them with environment-related data regarding Air Force facilities and activities that are relevant to the determination of compliance with applicable standards or emission limitations. However, Air Force installations or activities are not required to apply for state or local air and water pollution control permits or licenses for the construction or operation of facilities, including certification of operators, nor are they required to register facilities or operations if the registration process, in effect, is a permit application that would lead to the discretionary issuance or denial of a permit or license. Register Air Force activities only to the extent necessary to advise state and local authorities of the scope of Air Force activities.

15. Conduct an integrated multiple-use natural resources land-management program for forest and woodlands, fish and wildlife, open space, soil, water, vegetation, outdoor recreation, natural beauty, and increased public use and nonconsumptive utilization on lands under Air Force administration within the framework of AFR 91-26 and AFM 126-1.

16. Cooperate to the extent practicable in beneficial community environmental action volunteer environmental enhancement programs with appropriate logistical support. When possible, the cooperation and assistance of state and local conservation groups should be solicited. Formal consultation agreements may prove to be beneficial (AFM 126-1).

17. Preserve, restore, and maintain historic and cultural sites, structures, and objects, and protect paleontological and archaeological resources under Air Force jurisdiction.

18. Eliminate or control environmental pollutants generated by or resulting from Air Force operations or from contractor operations on real property owned, leased, or controlled by the Air Force consistent with the overall mission of the Air Force.

19. Protect wetlands from encroachment, filling, dumping, siltation, erosion, or other disturbance of their natural condition in accordance with applicable state and Federal statutes [20:2,3].

APPENDIX B

ARMY ENVIRONMENTAL POLICY

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ARMY ENVIRONMENTAL POLICY

The Department of the Army policy is that:

1. The achievement of environmental objectives is an integral part of the Army mission.

2. The environmental consequences of any proposed action will be considered during the planning process and will be evaluated along with the technical and economic factors in the decisionmaking process.

3. A detailed environmental impact statement will be prepared and processed in accordance with the National Environmental Policy Act when an environmental assessment reveals that the proposed action may significantly affect the qualify of the human environment, is highly environmentally controversial, or is anticipated to evoke litigation based upon environmental issues. "Environmentally controversial" relates to cases in which substantive, disagreement, real or purported, exists as to the extent, nature, or effect of the action on the environment.

4. Insofar as essential mission constraints permit, all programs and actions will be planned, initiated, and carried out in a manner to minimize polluting or degrading the environment.

5. All activities subject to Federal, State, or local applicable standards and monitored to insure compliance with such standards.

6. All material and energy resources will be procured and used in a manner that will minimize the emission of pollutants and the production of wastes in keeping with the national policies for energy conservation. Wastes generated will be reprocessed or reclaimed for other productive uses to the maximum extent practicable.

7. An understanding of the urgent need to preserve and restore the natural environment and to conserve material resources and an appreciation of the Army's support of the environmental protection effort will be fostered throughout the Army. Initiative, leadership, and cooperation in achieving these environmental objectives are encouraged of all personnel.

8. Commanders will cooperate, to the extent practicable, in beneficial community environmental action programs.

9. Historic and cultural sites, structures, and objects under Army jurisdiction will be preserved, restored, and maintained for the benefit and enjoyment of future generations.

10. An integrated, multi-use, natural resources, land management program will be conducted for forests and woodlands, fish and wildlife, open space, soil, water vegetation, outdoor recreation, natural beauty, and increased public access and nonconsumptive utilization on lands under Army jurisdiction within the provisions of AR 405-80 and AR 420-74.

At locations outside the United States, Department of the Army activities will comply with the requirements of the National Environmental Policy Act as set forth in Chapter 2 and conform at all times to the environmental quality standards of the host country, international agreements, and Status of Forces Agreements. The provisions of this regulation will be used, to the extent applicable in fulfilling environmental protection requirements in overseas locations.

When, in the interest of national defense, it is not considered practicable to comply with the foregoing policies, the matter will be referred with full particulars to HQDA (DAEN-ZCE) WASH DC 20310 [24:1-3].

It is the continuing policy of the Department of the Army, as a trustee of the environment, to demonstrate leadership of the environment, to demonstrate leadership and carry out its mission of national security in a manner consistent with national environmental standards, laws and policies. All practical means and measures will be used to minimize or avoid adverse environmental consequences and in attaining the objectives of--

1. Providing a safe, healthful, productive, and esthetically and culturally pleasing surrounding.

2. Attaining the widest range of beneficial uses of the environment without degradation, risk to health or safety or other undesirable and unintended consequences.

3. Preserving important historic, cultural, and national aspects of our national heritage and maintaining

where possible an environment which supports diversity and variety of individual choice.

4. Achieving a balance between resources use and development within the sustained carrying capacity of the ecosystem involved.

5. Enhancing the quality of renewable natural resources and approaching the maximum attainable recycling of depletable resources [24:2-3].

APPENDIX C

NAVY ENVIRONMENTAL POLICY

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NAVY ENVIRONMENTAL POLICY

The Department of the Navy policy is:

1. The Navy will actively participate in a program to protect and enhance the quality of the environment, through adherence to all applicable regulatory standards, and by initiating actions to conserve natural resources, protect historical and cultural properties and prevent or control pollution caused by Navy facilities.

2. In accordance with E.O. 11752, Navy shore activities and forces afloat, as appropriate, will cooperate with Federal, state, and local environmental protection organizations and comply with the official substantive standards and criteria promulgated by such agencies. However, it is not required that naval facilities comply with state or local administrative procedures with respect to pollution abatement and control. Where, in the interest of national defense or other relevant reasons, it is considered impracticable to comply with such standards and criteria, the matter should be referred to Chief of Naval Operations (Op-04) via the chain of command, for resolution.

3. The Navy will establish an integrated multiple-use program for the renewable natural resources in forests and woodlands, fish and wildlife, soil, water, grasslands, outdoor recreation, landscaping, natural beauty, protection of endangered species and preservation of cultural and historic properties in consonance with Federal programs and compatible with the military mission.

4. It is Navy policy that Navy installations overseas will cooperate with the host country in implementing Navy environmental programs to the extent practicable and conform at all times to the environmental quality standards of the host country, international agreements and status of forces agreements.

5. Navy ships in foreign harbors and units overseas will conform to environmental quality standards set forth in applicable international, bilateral and status of forces agreements to which the U.S. Government is a party.

6. The Navy will insure that policies and procedures for the prevention, control and abatement of air, water, and noise pollution comply with E.O.'s 11514 and 11752.

7. Where resources to accomplish pollution control are limited, priority of effort will be afforded in accordance with the following order: (1) those situations which constitute a direct hazard to the health of man; (2) those having economic implications; and (3) those which affect the recreational and esthetic value of our natural resources.

8. RDT&E efforts and engineering investigations shall be initiated, when required, for Navy environmental pollution problems to meet existing pollution abatement standards and anticipated standards for national policy regarding pollution. RDT&E studies utilizing Navy funds should be directed towards solving specific Navy-caused pollution problems. Broad studies for improvement or surveillance of non-Navy environmental problems should normally be funded by the Federal agency that has primary responsibility for the effect.

9. Environmental pollution controls, procedures, methods, and systems shall be coordinated with standards promulgated pursuant to the Occupational Safety and Health Act, as amended, and related Navy directives, in order to insure safe and healthful work conditions for naval personnel.

10. Cost-effectiveness studies shall be conducted, as applicable, prior to making a decision among options for meeting environmental quality standards. For example, in some cases it may be more efficient or effective to phase out and transfer activities to other activities, rather than install pollution control devices. In other instances, it may prove more economical to install new equipment or systems rather than control existing systems. Where alternatives such as construction of new waste treatment systems or connection to municipal systems, particularly regional systems, are available, the alternatives will be analyzed and evaluated as required by regulations on the economics of proposed DoD investments as well as for environmental considerations.

11. Executive Order 11752 provides that Heads of agencies shall not use for any other purpose any of the amounts appropriated and apportioned for pollution abatement projects necessary to meet the requirements of the Executive Order. Accordingly, all funds appropriated and apportioned for pollution abatement projects under the Navy Environmental Protection Program shall not be used for any other purposes.

12. Environmental pollution prevention features will be incorporated in the basic design and requests for funding for weapons systems, naval vessels, aircraft, logistic systems and materials, tests and exercises, and projects for conversion, alteration, expansion, extension, and construction of facilities. The preferred method for abatement and control of environmental pollution is at the source of the pollutants. Therefore, environmental pollution prevention shall be integrated into any planned industrial process, operation, or product and be considered as part of the cost of daily operations.

13. Insofar as feasible, the Navy shall participate in regional community pollution abatement systems and shall purchase services from such systems in lieu of constructing and operating such facilities.

14. In use, storage, and handling of all materials, including, but not limited to, solid fuels, ashes, petroleum products, and other chemical and biological agents, shall be carried out to avoid or minimize the possibilities of water and air pollution. When appropriate, preventive measures shall be taken to entrap spillage or discharge to prevent accidental pollution. Each command and activity shall establish appropriate emergency plans and procedures for dealing with accidental pollution.

15. No waste shall be disposed of or discharged in any manner which could result in the pollution of ground water and endanger the health or welfare of the public.

16. Discharges of radioactive materials shall be in accordance with the applicable rules, regulations, or requirements of the Energy Research and Development Administration or the Nuclear Regulatory Commission, as appropriate, and with the policies and guidance of the Environmental Protection Agency as published in the Federal Register.

17. Under applicable Federal laws and EPA regulations, no Federal agency shall enter into any contract for the procurement of goods, materials or services, to be performed in whole or in part, in a facility which has given rise to a conviction of an offense in violation of a Federal environmental law.

18. The transportation and discharge to the sea, or any waters, of oils, oily wastes, sludges, industrial wastes, or refuse, that have been collected ashore or from ships in port is prohibited. The disposal of unserviceable ammunition to the sea is also prohibited except as may be

specifically authorized on a case-by-case basis by the Chief of Naval Operations and in accordance with appropriate EPA ocean dumping regulations (40 CFR 220-227).

19. Each Navy command operating a waste collection or treatment system shall have positive control over the wastes which are delivered to that system for transportation and/or processing. As appropriate, intra-base procedures for such control shall be established, as for example, in host/tenant agreements and in inter-service support agreements.

20. Pollution abatement funds shall not be used for recurring operation or maintenance costs nor will they be used to fund costs of pollution control aspects of new facilities or modifications or alterations [31:2-5].

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