



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
2000 NAVY PENTAGON
WASHINGTON, D.C. 20350-2000

IN REPLY REFER TO

5090

Ser N456F/8U589129

30 NOV 1998

From: Chief of Naval Operations

Subj: GUIDANCE ON PREPARING NATIONAL ENVIRONMENTAL POLICY ACT
DOCUMENTS FOR INTEGRATED NATURAL RESOURCES MANAGEMENT PLANS

Ref: (a) ASN (I&E) memo of 12 Aug 98
(b) CNO ltr 5090 Ser N45D/8U589016 of 25 SEP 98 (w/ encls)
(c) Sikes Act Improvement Act of 1997, P.L., 105-85

Encl: (1) Subject guidance with enclosure

1. Enclosure (1) provides guidance to Navy commands in preparing National Environmental Policy Act (NEPA) documents for Integrated Natural Resources Management Plans (INRMPs), pursuant to reference (a). This guidance supplements enclosure (3) of reference (b) and shall prevail for all matters involving interpretation of NEPA requirements. The guidance is applicable to all Navy commands that require preparation of INRMPs within the geographical borders of the U.S., its territories and possessions, as mandated by reference (c).

2. Enclosure (1) can be made available electronically upon request. My point-of-contact for this matter is Mr. Matthew Hess, N456F, at phone (703) 604-5421, or E-mail at hess.matthew@hq.navy.mil.

A. A. GRANUZZO
Rear Admiral, U.S. Navy
Director, Environmental Protection
Safety and Occupational Health Division

Distribution: see next page

Subj: GUIDANCE ON PREPARING NATIONAL ENVIRONMENTAL POLICY ACT
DOCUMENTS FOR INTEGRATED NATURAL RESOURCES MANAGEMENT PLANS

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DEPARTMENT OF THE NAVY
THE ASSISTANT SECRETARY OF THE NAVY
(INSTALLATIONS AND ENVIRONMENT)
1000 NAVY PENTAGON
WASHINGTON, D.C. 20350-1000

12 Aug 98

MEMORANDUM FOR THE VICE CHIEF OF NAVAL OPERATIONS
THE ASSISTANT COMMANDANT OF THE MARINE CORPS

Subj: DEPARTMENT OF THE NAVY ENVIRONMENTAL POLICY MEMORANDUM
98-06; REVIEW OF INTEGRATED NATURAL RESOURCES MANAGEMENT
PLANS UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

Encl: (1) Purpose and Need Section

Background. The Sikes Act Improvement Amendments of 1997, 16 U.S.C. § 670a et seq., require military installations to prepare and implement integrated natural resource management plans (INRMPs) to provide for:

- Conservation and rehabilitation of natural resources.
- Sustainable multipurpose uses of resources.
- Public access for use of natural resources, subject to safety and military security considerations.

This statutory requirement is a major change for the conservation pillar of our environmental program. An INRMP is no longer a notional document prescribing how an installation may manage military land(s) if circumstances permit. Rather it is now a legislatively required document that must be implemented.

Under the Sikes Amendments, INRMPs shall provide, to the extent appropriate and applicable "...establishment of specific natural resource management goals and objectives and time frames for proposed action." Installations must prepare INRMPs with an opportunity for public comment and must review the plans on a regular basis, but no less often than every five years.

Requirement. Documentation under NEPA is required before approval of all new or newly revised INRMPs. Under normal circumstances, an environmental assessment (EA) may suffice. However, if the goals, objectives, or essential/selected projects identified in an INRMP will have a significant environmental impact, an environmental impact statement (EIS) is required. An INRMP and an EA or EIS may be prepared and processed as one document (i.e., the INRMP may be prepared in the format of an EA or EIS) or a draft INRMP and an EA/EIS may be prepared and processed separately. Regardless of the approach, the public must be afforded an opportunity to comment on the INRMP prior to completion of the NEPA process.

Key Issues.

- INRMP Goals: An INRMP shall address land management for an installation versus land use. Land use is determined by an installation's military mission(s) and by legal restrictions regarding certain protected natural resources. The Goals of an INRMP

Encl (1)

shall be to maintain or develop and implement an ecosystem based conservation program that:

- Provides for conservation and rehabilitation of natural resources in a manner that is consistent with the military mission.
 - Integrates and coordinates all natural resources management activities.
 - Provides for sustainable multipurpose uses of natural resources.
 - Provides for public access for use of natural resources, subject to safety and military security considerations.
- Purpose and Need Section of EA/EIS: The purpose and need section will be consistent with the purpose and need set forth in enclosure (1).
 - EA/EIS Alternatives Identification and Analysis: Consider a reasonable range of alternative mixes of natural resources management objectives, including the no action alternative. The no action alternative will reflect the status quo. Management objectives are land management, forest management, fish and wildlife management, and management of natural resources for outdoor recreation as defined and discussed in Department of Defense, Navy, and Marine Corps natural resources program guidance. Identify projects that are essential to fulfill each alternative mix of management objectives.
 - Mandatory Project Implementation: All projects essential to fulfill the selected alternative (mix of management objectives) must be implemented within a timeframe indicated in the INRMP. Any deviation or change from achieving the selected alternative may require supplementation to the EA or EIS and an opportunity for public comment. An installation may add or modify projects for achieving the selected alternative without additional review under NEPA if the projects are consistent with the existing NEPA analysis.

My point of contact for this matter is Mr. Lew Shotton at (703) 588-6671.



ROBERT B. PIRIE, JR.

PURPOSE AND NEED SECTION FOR NATIONAL ENVIRONMENTAL POLICY ACT
DOCUMENTATION REGARDING PROPOSED INTEGRATED NATURAL
RESOURCES MANAGEMENT PLANS

The purpose of this action is to meet statutory requirements under the Sikes Act Improvement Act, Public Law 105-85, Div. B, Title XXIX, Nov. 18, 1997, 111 Stat 2017-2019, 2020-2022.

In November 1997, the Sikes Act, 16 U.S.C. § 670a et seq., was amended to require the Secretary of Defense to carry out a program to provide for the conservation and rehabilitation of natural resources on military installations. To facilitate this program, the amendments require the Secretaries of the military departments to prepare and implement integrated natural resource management plans for each military installation in the United States unless the absence of significant natural resources on a particular installation makes preparation of a plan for that installation inappropriate.

The principal use of military installations is to ensure the preparedness of the Armed Forces. The Sikes Act Improvement Act requires each installation to prepare an integrated natural resource management plan that provides for the following management activities, to the extent that such activities are consistent with use of the installation for military preparedness:

- The conservation and rehabilitation of natural resources on the installation;
- The sustainable multipurpose use of the resources, to include hunting, fishing, trapping, and nonconsumptive uses; and
- Subject to safety requirements and military security, public access to this installation to facilitate such uses.

As required by the Sikes Act Improvement Act, the plan must, to the extent appropriate and applicable, provide for:

- Fish and wildlife management, land management, forest management, and fish- and wildlife-oriented recreation;
- Fish and wildlife habitat enhancement or modification;
- Wetland protection, enhancement, and restoration, where necessary for support of fish, wildlife, or plants;
- Integration of, and consistency among, the various activities conducted under the plan;
- Establishment of specific, natural resource management goals and objectives and time frames for proposed action;
- Sustainable use by the public of natural resources to the extent that the use is not inconsistent with the needs of fish and wildlife resources;
- Public access to the military installation that is necessary or appropriate for the sustainable use of natural resources, subject to requirements necessary to ensure safety and military security;
- Enforcement of applicable natural resource laws (including regulations);
- No net loss in the capability of the installation's lands to support the military mission of the installation; and
- Such other activities as the Navy has determined are appropriate.

In preparing this plan, as required by the Sikes Act Improvement Act, [name of installation] has worked in cooperation with the [name appropriate U.S. Fish and Wildlife Service office] and [name appropriate State fish and wildlife agency] so that the plan will reflect the mutual agreement of these parties concerning conservation, protection, and management of fish and wildlife resources on the installation. [Option 1 for separate NEPA document: Also as required by the Sikes Act Improvement Act, the plan has been provided for public comments and the installation has taken those comments into account in preparing the plan.] [Option 2 for single NEPA/INRMP document: Also as required by the Sikes Act Improvement Act, this plan is provided herewith for public comment. Such comment will be taken into account in [EA: finalizing the plan] [EIS: preparing the final environmental impact statement for the plan].

CHIEF OF NAVAL OPERATIONS
GUIDANCE FOR PREPARING NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)
DOCUMENTS FOR INTEGRATED NATURAL RESOURCES MANAGEMENT PLANS (INRMPs)

A. PURPOSE

The purpose of this document is to provide guidance to Navy commands in preparing NEPA documents for INRMPs required by the Sikes Act (as amended). This guidance is intended to be consistent with the SECNAV Memorandum dated 12 AUG 98 (enclosure 1) and further clarifies issues regarding implementation of that memorandum. This guidance is provided to supplement "Guidelines for preparing INRMPs for Navy Installations," and shall prevail for all matters involving interpretation of NEPA requirements. This guidance describes the methods to be used for alternatives and analysis, and also integrates the NEPA process and requirements into the process for developing an INRMP.

B. SCOPE

This guidance is applicable to all Navy commands that require preparation of INRMPs within the geographical borders of the U.S., its territories and possessions.

C. PROCESS:

There are two approaches suggested in enclosure (1) for implementation of the NEPA requirement for INRMPs: (1) that the NEPA document may be a separate document from the INRMP, or (2) that it may be combined with the INRMP as a single document. It is suggested that separate documents be prepared, but this should be decided on a case-by-case basis. If prepared separately, it is recommended that the NEPA and INRMP processes run concurrently, so that an exceptional extension of the INRMP process is not required (see Figure 1).

Environmental Planners should become involved early in the INRMP process, beginning with the identification of, and interactions with, the "stakeholders." This is part of the scoping process in NEPA. Environmental Planners should also assist Natural Resources personnel with preparation of the draft INRMP and discuss with Natural Resources personnel whether regulatory agencies will review the documents and provide letters of concurrence/agreement on the INRMP (see Section D). It should also be discussed whether these regulatory agencies should be identified as "stakeholders." Environmental Planners should also assist with preparation of reasonable alternatives that will need to be evaluated in the NEPA document, including the preferred and no-action alternatives. In the event that scoping indicates an Environmental Impact Statement (EIS) is required, the Notice of Intent should be issued as soon as possible.

A description of the existing environment and reasonable alternatives that were considered (see Alternatives below for further guidance) will be available in the preliminary draft INRMP to begin writing preliminary drafts of the NEPA document. After the preliminary draft INRMP is sent to the State Fish and Game (SF&G), the U.S. Fish and Wildlife Service (USFWS) and other "stakeholders," and comments are received, the INRMP and/or NEPA document will be revised as needed. If an Environmental Assessment (EA) is prepared, the EA should be approximately 75% complete by the time the INRMP is provided for public comment. Relevant public comments should then be addressed in the text of the EA, as appropriate. At this point, staff preparing the INRMP should provide to jurisdictional agencies any applicable Navy determinations for their concurrence/agreement. The EA should be approximately 90% complete by the time letters of concurrence are requested for return. These letters of concurrence will be incorporated into an appendix of the EA. The Finding Of No Significant Impact (FONSI) must be issued before the INRMP is signed.

If an EIS is prepared, the DRAFT EIS (DEIS) should be completed and made available for public review and comment simultaneous with public review of the INRMP. This will avoid subsequent delays in processing and approving the INRMP. It is further recommended that the DEIS and draft INRMP be provided together so that reviewers can provide a single set of comments for both documents. In order to release the DEIS for public review, any formal Navy determinations (that request jurisdictional concurrence/agreement) need to be in-progress and discussed in the DEIS where relevant. After mutual agreement on the preferred INRMP among the SF&G, the USFWS, and other appropriate jurisdictional agencies, the Final EIS (FEIS) can be released for public review. The Record Of Decision (ROD) must be issued before the INRMP is signed.

D. CONTENT OF THE NEPA DOCUMENT

PROPOSED ACTION, PURPOSE AND NEED

The Purpose and Need for the action has been provided in the enclosed SECNAV Memorandum for use in the NEPA document. In most instances, this Purpose and Need should not require further elaboration.

The following statement should be used in most instances for the Proposed Action:

"The proposed action is to modify the existing Natural Resources Management Plan and practices at [name installation] to develop and implement an Integrated Natural Resources Management Plan consistent with the military use of the property and the goals and objectives established in the Sikes Act (as amended). The goal of the INRMP is to implement an ecosystem based conservation program that provides for conservation and rehabilitation of natural resources in a manner that is consistent with the military mission; integrates and coordinates all natural resources management activities; provides for sustainable multipurpose uses of natural resources; and provides for public access for use of natural resources subject to safety and military security considerations. The management objectives are to

integrate forestry management, fish and wildlife management, land management, and management for outdoor recreational opportunities, as practicable and consistent with the military mission and established land uses."

ALTERNATIVES:

Consistent with enclosure 1, the above proposed action establishes the no-action alternative, and should be presented as follows:

"The No-Action Alternative is continued implementation of the objectives and practices outlined in the existing Natural Resources Management Plan. On-going practices used for management of natural resources at [installation name] would continue and there would be no change to the objectives outlined under the current Natural Resources Management Plan."

Alternatively, if there is currently no existing plan, the no-action alternative should be presented as:

"The No-Action Alternative is continued implementation of the objectives and practices under the existing natural resources management programs. On-going practices used for management of natural resources at [installation name] would continue and there would be no change to the objectives of the current natural resources management programs."

At the beginning of the Alternatives Section, all issues that relate to the military use of the property should be clearly defined, including issues that affect natural resources management (e.g., Bird/Aircraft Strike Hazard requirements, clear zones, military training areas, etc.). These issues should be identified as criteria that determine limitations and constraints posed by existing military land-use, and also provide opportunities for natural resources management that support, and are consistent with, the military mission. This information will have been considered, and should be readily available in the INRMP for use in the NEPA document.

Alternatives will consist of modifications to the four management objectives: forestry management, fish and wildlife management, land management, and management for outdoor recreational opportunities, as determined reasonable and consistent with the military mission. Navy natural resources specialists should be considering reasonable alternatives in developing the INRMP, but Environmental Planners should assist in refinement of those alternatives for use in the NEPA document. Each alternative should describe the general geographic extent where each of the four management objectives would occur, i.e., each alternative should show the "management area(s)" for the four objectives (see Figures 2, 3, 4). The NEPA document should also provide a summary of how the management objectives differ in intensity and scope for each alternative. Because each "management area" is planned for compatibility with, and is integrated to support, the military mission in the present and foreseeable future, it is expected that there will be few reasonable alternatives and these may only reflect a small change in one or two of the "management

areas." This necessitates that Navy natural resources staff provide the following: (1) a map outlining the preferred alternative's objectives along with a list of projects/practices and a brief description of their scopes; (2) maps outlining other alternatives' objectives along with a list of projects/practices and a brief description of their scopes; and (3) a map outlining the existing Plan's objectives along with a list of recent and on-going projects/practices (last five years) and a brief description of their scopes.

It is important that a map, and a summary outlining the existing plan/programs' objectives and a list of projects/practices are included in the NEPA document because these will establish the baseline against which any new or proposed changes will be compared (see following section). If the existing Natural Resources Management Plan and/or practices are determined to meet the Sikes Act requirements for an INRMP, the "no-action" alternative would be considered viable, and in some instances, could be determined to be the preferred alternative. In this case, potential impacts of the "no-action" alternative will have to be fully evaluated in the Impacts Section of the NEPA document. If the "no-action" alternative is not considered viable, this alternative should be eliminated in the Alternatives Section with an explanation why it does not meet Sikes Act requirements for an INRMP.

AFFECTED ENVIRONMENT AND CONSEQUENCES

The length of discussion in the Affected Environment should mirror the evaluation of that same issue in the Environmental Consequences Section and will vary among issues depending on the context and intensity of potential impacts. For example, if there is a high degree of controversy, of regulatory agency involvement, or of unique characteristics within the geographic area, a more complete discussion and analysis may be needed for that issue. Only describe resources that may be affected by implementation of the alternatives.

Analysis in the NEPA document will focus on evaluation and comparison of alternative plans in terms of the four management objectives - not the individual projects or practices. The content of the NEPA analysis will therefore be "programmatic" in that it will evaluate alternative programs for managing an installation's resources. The projects and practices must be listed for each alternative and presented as "compliance" or "stewardship" projects/practices. However, the intent here is for the NEPA analysis to only capture their overall impacts in a broad sense. The projects/practices list will provide a framework for reviewing changes from on-going activities, and will also assist in reviewing changes for unforeseen projects or modifications in the future. Again, it is important to distinguish that this NEPA analysis for evaluating plans/programs, is different from the normal level of analysis used for project-specific actions. A "programmatic" approach will provide opportunities for the installation to accommodate unforeseen projects, as well as changes to the projects, as long as impacts are covered within the overall scope and analysis for the selected alternative. This is consistent with enclosure (1) which states: "An installation

may add or modify projects for achieving the selected alternative without additional review under NEPA if the projects are consistent with the existing NEPA analysis."

One of the main considerations in comparing alternative plans that the NEPA document should focus on is evaluation of impacts at a regional and community level. One of the main reasons for managing natural resources is to provide ecological benefits that go beyond the boundary of the installation. Regional and community information will be provided in the INRMP, and should be summarized and used for comparison of the alternatives. These considerations may be best presented in the Cumulative Impacts Section where a brief discussion of broad regional/community-level activities, natural resources and land-use issues may be relevant. For example, forested buffers located beyond air field safety zones may support the military mission by acting as visual or noise attenuation barriers, but can also be managed to add diversity and enhance the landscape providing benefits to the region and local community. These issues should be included in an alternatives matrix table that is presented in the Alternatives Section.

It is important to recognize that some impacts for an alternative, including the preferred alternative, may be additive to activities that are recurring/on-going under the current plan, while other impacts will only result from modification/changes to the existing or "baseline activities" (no-action alternative). An example of the former is dune restoration within a new area that may complement and extend areas previously restored. An example of the latter are impacts associated with a hunting program that only consider the *net* changes, or impacts that differ from the on-going hunting program. Estimates should be used in considering the overall impacts of projects/practices as needed to make comparisons among the reasonable alternatives (indicate where conservative estimates are used).

If "Conformity Review" is required by the General Conformity Rule (GCR), an Applicability Analysis will evaluate the proposed changes/modifications from recurring and on-going projects/practices under the current plan (only the *net* changes will be evaluated). It is important to point out that Conformity Rule analysis will be unique from other analyses in these NEPA documents because the GCR requires that individual projects be considered in determining the net emissions' increase/decrease. Those recurring and on-going activities (last five years) that are similar in scope to the new projects/practices identified in an alternative (subsequent years) should be identified and "lined-out" before estimating emissions for the relevant criteria air pollutant. Assumptions should be used for individual projects/practices rather than calculating expected emissions' levels for individual projects (e.g., < 1 ton/yr. estimated for *net* riparian buffer restorations; < 1 ton/yr. estimated for dune plantings; "negligible" assumed for *net* changes to hunting program, etc.).

If qualified Navy specialists determine that there may be an affect to resources under regulatory agency jurisdiction, letters of concurrence from regulatory agency(s) will be required to complete the NEPA

process. When required, the INRMP should be submitted to the appropriate regulatory agency with Navy's determination of potential effects (coastal consistency, etc.). Agency concurrence may be requested with its review of the NEPA document, but agency review is better provided during the public review of the INRMP because this will facilitate timely completion of the INRMP process (see Figure 1). For example, if Navy prepares a Coastal Consistency Determination for concurrence by the State Coastal Resources Program (SCRCP), in many instances its review does not allow for submittal of draft documents. Conversely, a separate Coastal Consistency Determination should be prepared by Navy and sent to the (SCRCP) for concurrence. The need for letters of concurrence will vary on a case-by-case basis depending on the potential for impacts.

As a final note, Navy's environmental planners have always demonstrated their versatility and aptitude in adapting to new challenges. They should become involved early in the process to assist in developing a strategy for the successful completion of the NEPA requirements and the INRMP. This guidance is intended to provide a level of consistency in the way NEPA documents are prepared for INRMPs. At the same time, it is recognized that there will be different challenges for each INRMP and this guidance is intended to maintain flexibility for Navy Commands and environmental planners to meet those challenges.

FIGURE 1: NEPA PROCESS INTEGRATED TO INRMP PROCESS

(from)

APPENDIX I: INRMP PROCESS

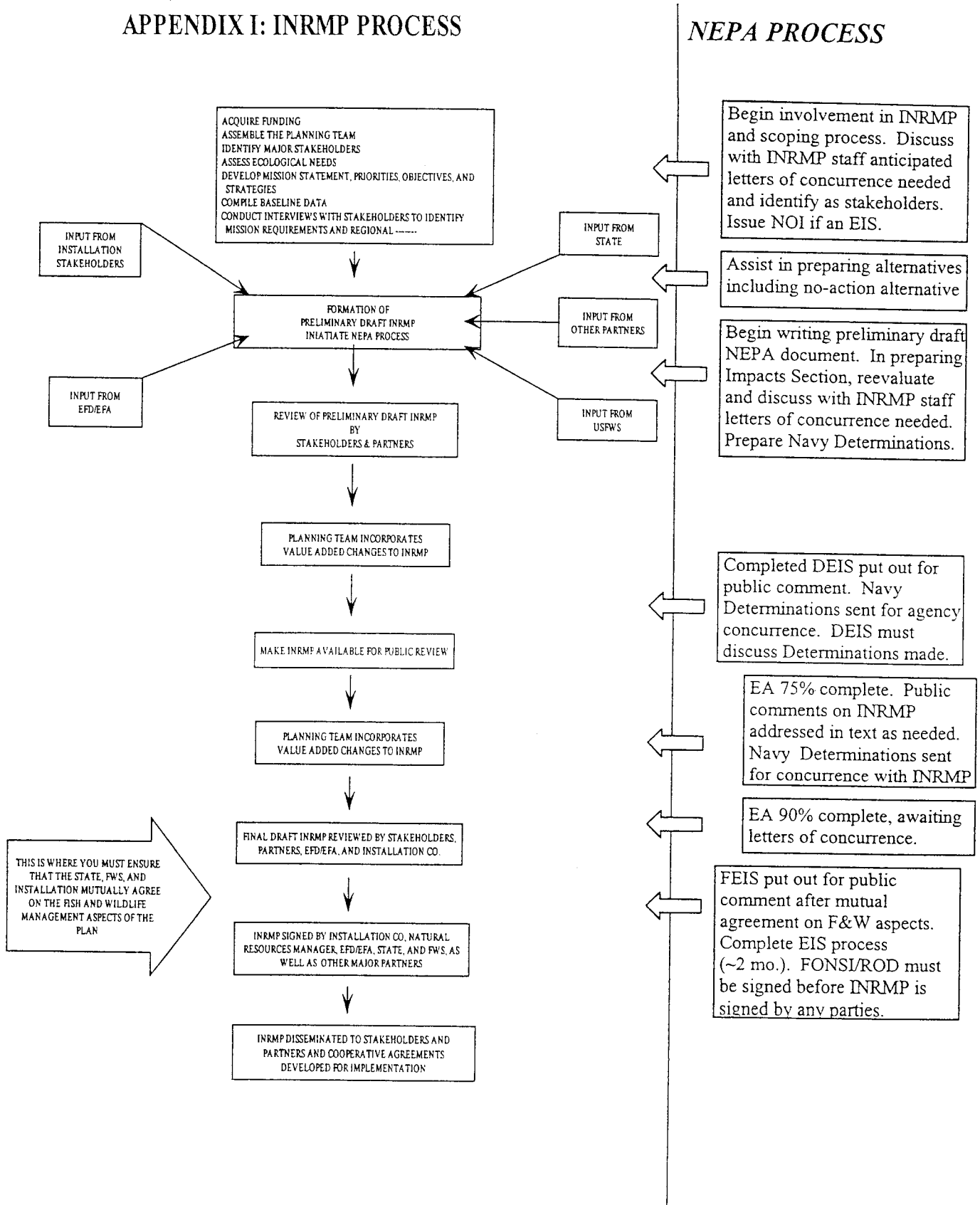
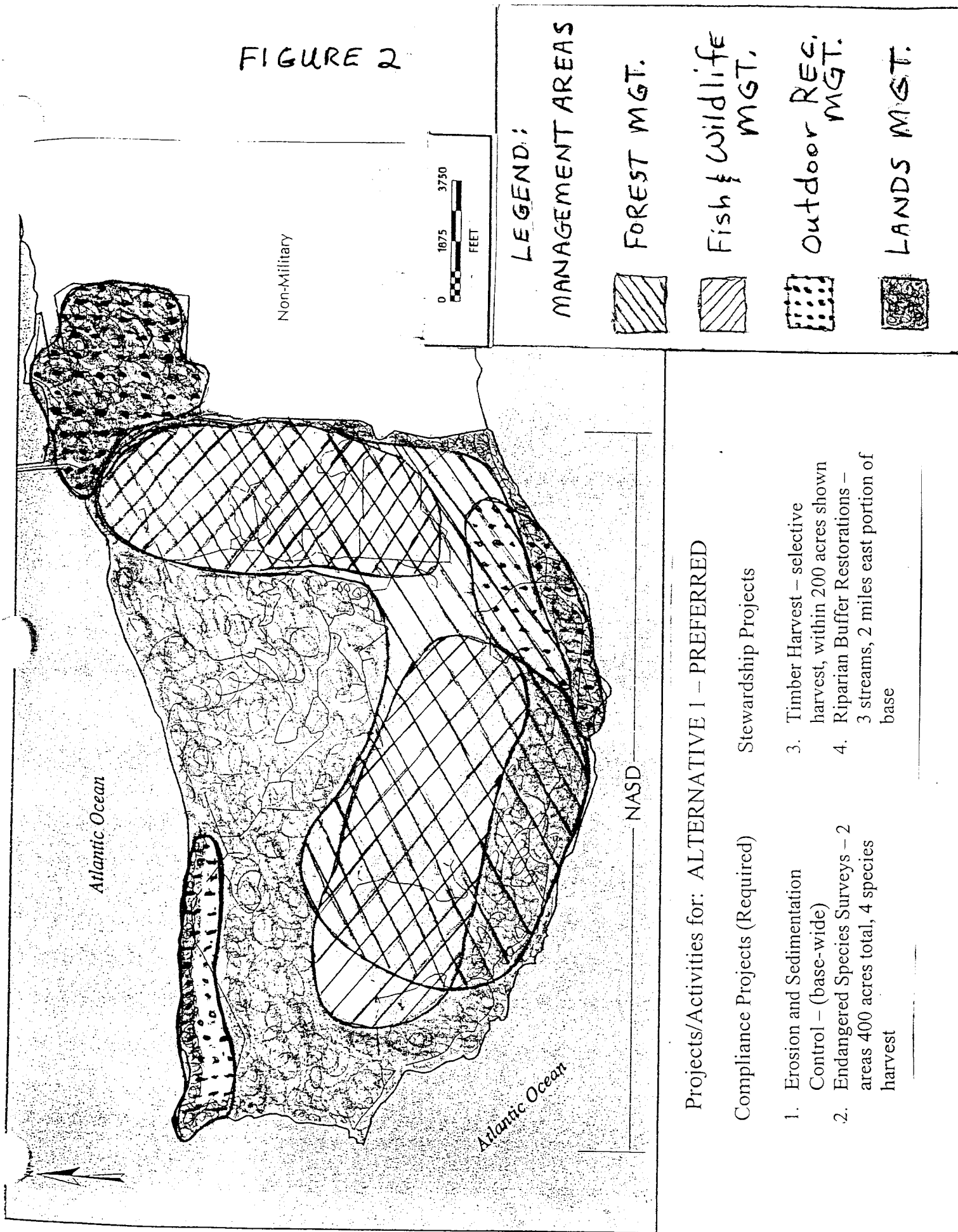


FIGURE 2



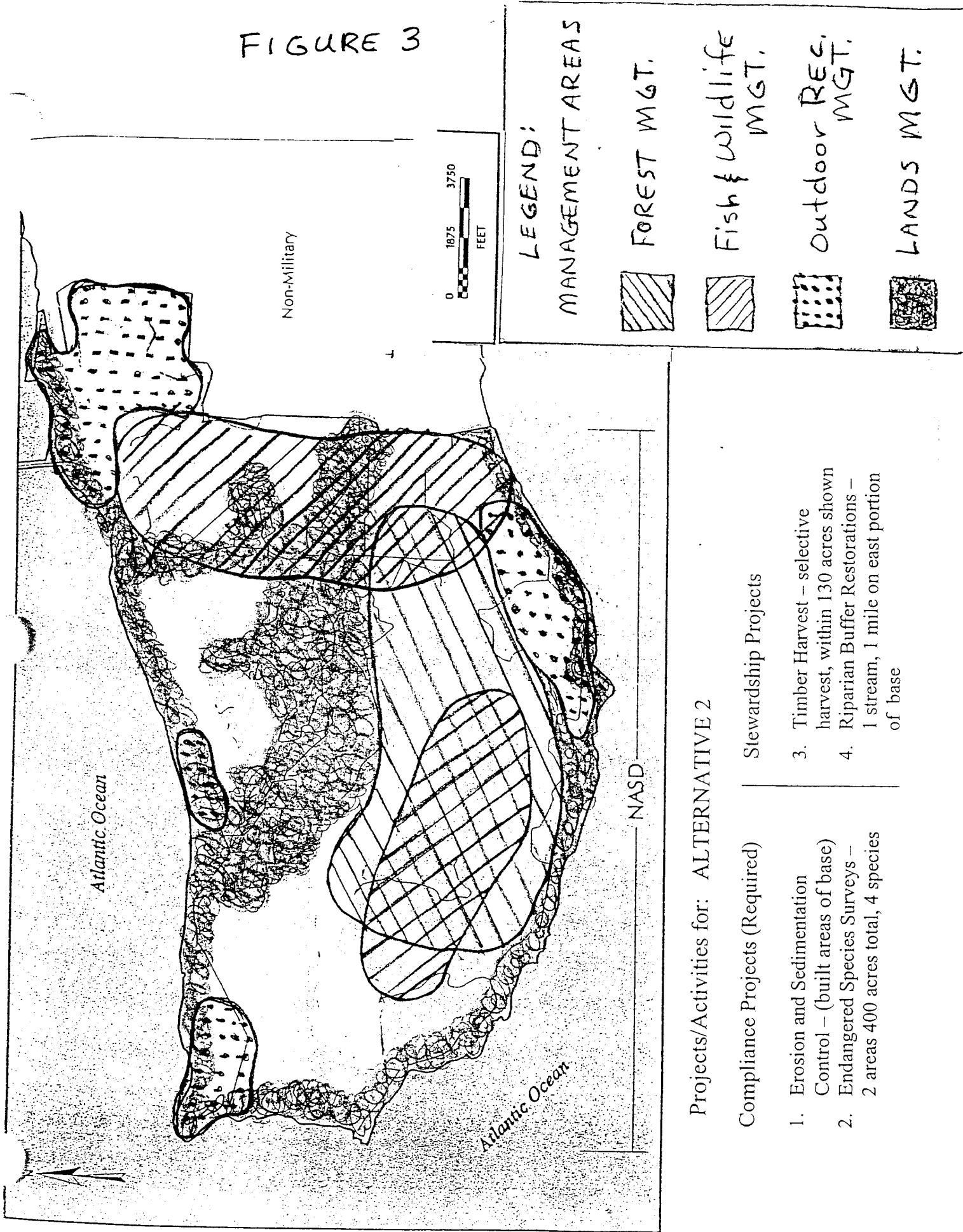
Projects/Activities for: ALTERNATIVE 1 - PREFERRED

Compliance Projects (Required)

Stewardship Projects


1. Erosion and Sedimentation Control - (base-wide)
2. Endangered Species Surveys - 2 areas 400 acres total, 4 species harvest
3. Timber Harvest - selective harvest, within 200 acres shown
4. Riparian Buffer Restorations - 3 streams, 2 miles east portion of base


FIGURE 3




LEGEND:

MANAGEMENT AREAS

 FOREST MGT.

 Fish & Wildlife MGT.

 Outdoor REC. MGT.

 LANDS MGT.

Projects/Activities for: ALTERNATIVE 2

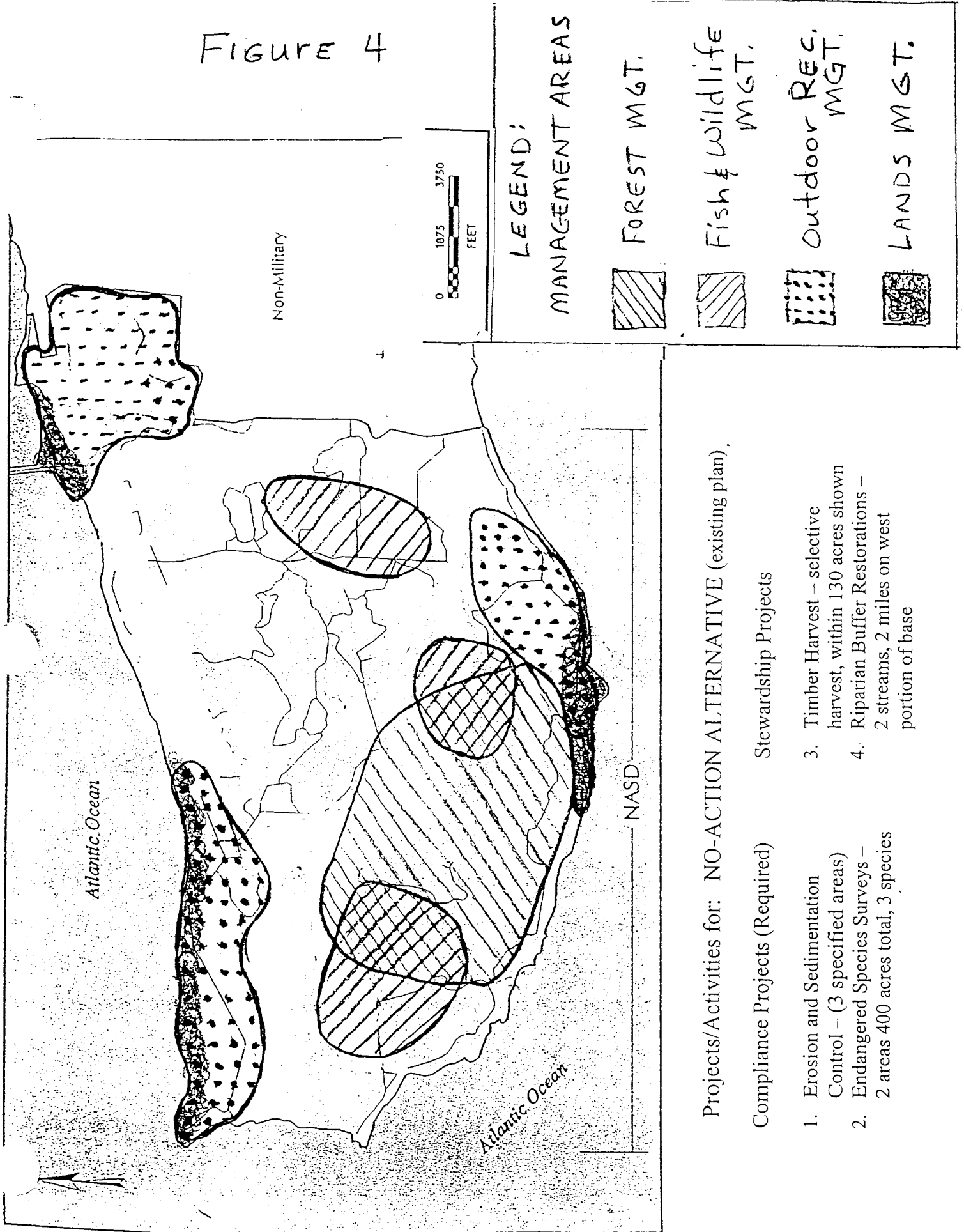
Compliance Projects (Required)

1. Erosion and Sedimentation Control – (built areas of base)
2. Endangered Species Surveys – 2 areas 400 acres total, 4 species

Stewardship Projects

3. Timber Harvest – selective harvest, within 130 acres shown
4. Riparian Buffer Restorations – 1 stream, 1 mile on east portion of base

FIGURE 4



LEGEND:

MANAGEMENT AREAS

FOREST MGT.

Fish & Wildlife MGT.

Outdoor REC. MGT.

LANDS MGT.

Projects/Activities for: NO-ACTION ALTERNATIVE (existing plan)

Compliance Projects (Required)

1. Erosion and Sedimentation Control - (3 specified areas)
2. Endangered Species Surveys - 2 areas 400 acres total, 3 species

Stewardship Projects

3. Timber Harvest - selective harvest, within 130 acres shown
4. Riparian Buffer Restorations - 2 streams, 2 miles on west portion of base