Implementing Base Realignment and Closure Decisions In Compliance With The National Environmental Policy Act

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Implementing Base Realignment and Closure Decisions In Compliance With The National Environmental Policy Act

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Abstract

Signing the Records of Decision (RODs) for U.S. Army Base Realignment and Closure (BRAC) Environmental Impact Statements (EISs) has been impeded by modified proposed action, lack of environmental information, and unclear definition of responsibilities in the National Environmental Policy Act (NEPA) process. This policy analysis provides a framework to implement the spirit and intent of NEPA in accordance with BRAC mandates. Changes in U.S. Army force structure require base realignments and closures. These actions may not proceed without adequate implementation of NEPA. The issues and problems associated with implementing NEPA for BRAC are complex and difficult to define concisely. This policy analysis attempts to identify the underlying problems of BRAC and evaluates alternative strategies to overcome difficulties in preparing environmental analyses and documentation. These strategies focus on improving decision-making, NEPA flexibility, and the overall substantive quality of environmental analysis and documentation.

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1. Introduction

1.1 Purpose

The purpose of this paper is to examine better ways to attain the letter and intent of the National Environmental Policy Act (NEPA) process while accomplishing Base Realignment and Closure (BRAC) mandates. It is crucial that the NEPA environmental impact and analysis process (EIAP) operate within the context and in support of the base realignment and closure procedures. The primary goal of NEPA is to "foster excellent decision-making," not to create paper work or delays (Council on Environmental Quality, 1979). This report examines alternatives and proposes attainable strategies to solve problems often encountered during base realignment and closure. Some of the problems described here are not unique to NEPA and BRAC, but occur in other proposed actions as well.

This paper presents a framework for decision-makers to:

* Improve existing Environmental Impact Statements (EISs) so Records of Decision (RODs) may be signed, and the proposed actions proceed. (See Appendix A for the Study Coordination and Approval Form.)

* Comply with NEPA while implementing Army mission requirements

* Prevent impediments to future BRAC rounds.

1.2 Methodology

The first step of the study process was to review the issues. NEPA experts and practitioners met on 19 October 1990 for a one-day symposium to define the problem and identify initial strategies. (See Appendices B and C.)

Second, the Army Environmental Policy Institute (AEPI) synthesized records of the session, and performed supplemental

investigations and analysis. An initial discussion paper, dated 16 January 1991, formulated a policy analysis and recommendations of the symposium participants' input.

Third, because policy analysis is an iterative process the AEPI staff incorporated later comments and investigations to produce a second draft dated 17 April 1991. After further staffing and discussion, this final paper was produced.

1.3 Problem Situation

It is important to acknowledge a number of recognized axioms of policy analysis (Rondinelli, 1973).

* Policy problems are complex and difficult to define concisely.

* Each interested organization places emphasis on a different component of the problem or defines the whole problem in terms of the part.

* Policy evolves from a process of political, inter-organizational conflict over a wide variety of values and interpretations of rationality.

* Policy analysis is both a generator and a product of conflict.

Even under these imperfect circumstances, policy analyses do proceed.

The purpose of the October symposium was to uncover the underlying problems facing the Army in the base closure and realignment effort. Experts from the Army, academia, other federal agencies, and public interest groups (Appendix B has a complete list of participants) spent over half the session clarifying the problem definition to produce the following statement:

Responding to a budgeting and strategic mandate to change its force structure, the Army staff has been developing realignment and closure proposals without the benefit of sufficient environmental information and criteria. These proposals are then examined under NEPA, when the environmental problems of the proposals are revealed. Alternatively, events change, requiring new proposals and the need to begin a new NEPA process. The Army lacks a flexible mechanism(s) for providing timely environmental information of appropriate sufficiency on potentially affected installations, so that the Army staff (or a new Commission) can develop and the public respond to a fully informed proposal.

This statement does not completely represent the complex and interrelated quality of the problems. In addition, some of the problems described here are not unique to NEPA and BRAC, but occur in other proposed actions as well (Fee, January 1991). (For a summary of various views of the problem situation, the problems expressed by various individuals, see the Endnotes following this chapter.)

The issues appropriate to this policy analysis can be grouped into three major categories: managerial, methodological and technical.

1.3.1 Managerial

Managerial issues include resources (people and money), planning, scheduling, study process, inter-and intra-communication, and responsibilities. This paper discusses resource allocation, changes to the proposed action, NEPA interpretation, and proponency and preparation.

Allocating Resources

The organization responsible for the environmental impact analysis, documentation, and mitigation (proponent) does not control the resources (Clark, February 1991). Proponents that control their own resources are better able to execute their responsibilities. In addition, resource control allows for greater accountability for implementing any mitigation program.

Changes to the Proposed Action

Environmental impact analysis documents and records frequently require revisions as the proposed action changes (Adams, February 1991). Military force structure is currently evolving to reflect the world's changing geo-political conditions. BRAC is intended to restructure and streamline the military to meet future force structure and budget requirements. Due to rapidly changing world events (e.g., removal of the Berlin Wall and Operations Desert Shield/Storm) proposed closure and realignment actions continue to be either modified or canceled. When a proposed action changes between the initiation of the notice of intent (NOI) and the signing of the ROD in the NEPA process, documents must be revised, extending the environmental analysis process. As noted in the Analysis of the Preliminary Draft Environmental Impact Statement (PDIES) for Fort Belvoir Base Realignment and Closure (BRAC), commonly referred to as the "Autopsy," "It was difficult for the proponent to determine when to 'freeze' the action for the purpose of analysis" (Fee, January 1991).

NEPA Interpretation

Under the Base Realignment and Closure Act of 1988, NEPA does not apply to the decision to close or realign a base and move personnel and equipment. It applies only to those actions that carry out the closure or realignment. When one considers only the letter of the NEPA law (its procedural requirements) it can be perceived as a rigid detail requirement. In reality, there is much flexibility in creating an environmental analysis process that satisfies the spirit of NEPA (its substantive requirements). The perception of NEPA

as strictly a procedural requirement leaves the decision-maker few options when the proposed action changes between the NOI and the ROD. However, statutory requirements are flexible and their goals are substantive, not procedural. NEPA provisions, (i.e., Section 102(2) C) should be seen as means to an end and not as an end in themselves.

Proponency and Preparation

Army Regulation (AR) 200-2, Environmental Effects of Army Actions, defines a proponent as "the unit, element, or organization that is responsible for initiating and/or carrying out the proposed action." The proponent has the responsibility to prepare and/or secure funding for environmental documentation. AR 200-2 recommends that the proponent be the lowest-level decision-maker. Ideally, this would place the proponent at the installation level, to ensure that the most accurate information is used, and that the professionals closest to and most familiar with military activities and the regional environment supervise the analysis and document preparation. However, the sensitive nature of base realignment and closure caused proponency to be assigned to the major Army commands (MACOMs) for BRAC I.

Army Regulation 200-2 further clarifies that the proponent may or may not be the preparer. In the BRAC context, the MACOMs have been the proponent, but HQDA often assigned preparation to the regional Corps of Engineers district offices. Many of the district offices in turn contracted out the preparation tasks.

Another component of a proponency concern is addressing cumulative impacts. NEPA requires that an agency look at its proposed action in the context of other proposals in the area. Impacts of individual realignment actions may be trivial when considered in isolation, but may be quite significant when considered altogether.

1.3.2 Methodological

Methodological issues include how to conduct the environ-

mental impact analysis process (EIAP). Specific methodological concerns involve reuse and issue definition.

Reuse

Environmental considerations for installation reuse have not been consistently examined in closure environmental documents even though military base closure may leave the adjacent civilian community with significant economic and environmental uncertainty. Early in the closure process, there should be an effort to involve the local community in developing generic reuse scenarios based upon inherent environmental suitability.

Issue Definition

The EIAP does not consistently address significant environmental issues, particularly in BRAC (Brown, February 1991). There is neither consistency among environmental documents, nor is there consistency within one particular environmental document. This makes BRAC environmental documents less accurate and less useful than they should be. Overall, environmental documents form an interrelated body that includes baseline information and review of the issues. The tight deadlines for preparing BRAC environmental documents can make it difficult for the preparer to collect relevant baseline data to tailor the environmental document to address pertinent issues.

1.3.3 Technical

Technical issues pertain to the EIAP systems and techniques, and consist primarily of obtaining adequate information for environmental analysis. Installations have inadequate environmental baseline data (Brown, February 1991). This issue is not unique to the BRAC process. The quality of an environmental analysis is largely information-dependent. Therefore, preparers and proponents need to obtain current, relevant environmental baseline information to perform the analyses that will affect later decisions.

Endnotes

Views of the Problem

* Changing geo-political and domestic conditions are driving changes in force structure
* Not predecisional since alternatives are not considered
* Revisions are required when proposed action changes
* BRAC is a departure from normal Army property releases under the Federal Property Disposal Act
* Closure will not occur if there is inadequate funding to remediate hazardous waste sites
* Environmental documents do not adequately address the proposed action
* Inadequate environmental baseline data
* Inconsistent substantive quality of environmental analysis and documents
* Connected actions of closure and realignment should be related to cumulative environmental effects
* Limited public scoping and review
* Army review process is long and cumbersome
* Role of proponent and preparer needs to be clearly defined
* Proponent should control resource allocation for environmental analysis and documentation
* Unclear about how to address the environmental considerations of reuse
* Unrealistic self-imposed time schedule for BRAC NEPA documents
* Poor communication between proponents, contractors, and reviewers
* Funding is sporadic

2. Setting

2.1 Historic Perspective

In the 1960s, under President Kennedy's direction, Secretary of Defense McNamara developed and implemented the most extensive base realignment and closure program in U.S. history. This was done with minimal consultation with the Military Services or Congress. The administration announced the closures while Congress was recessed. In response, during the next session, Congress passed legislation designed to involve itself in any Department of Defense (DoD) base closure program. President Johnson vetoed the proposal, and this set up a continuing conflict between the Executive and Legislative branches. Base closures, however, continued throughout the 60's.

In the 1970s, Congress thwarted base closure attempts by continually attempting to regulate the process. President Carter eventually approved legislation requiring DoD to notify Congress that a base is a candidate for realignment or closure; to prepare local economic, environmental, and strategic consequence reports; and to wait 60 days for Congress' response. This effectively halted base closures (Commission, December 1988).

In 1983, The President's Private Sector Survey on Cost Control (The Grace Commission) concluded that the national defense could be improved and made more cost-effective with an efficient military base structure. The Grace Commission recommended that a non-partisan, independent Commission be appointed to study this issue. In May 1988, the Secretary of Defense chartered the Commission on Base Realignment and Closure to recommend facilities in the U. S. and its possessions for realignment and closure.

The BRAC Commission found that the military value of various installations had decreased. Private, commercial, and residential development had grown closer to many military installations. At the same time, technology had increased the capability of modern weapon systems, which in turn often required more

training area. These two factors have made many installations less efficient, targeting them for closure. Other considerations involve the Army's future needs. The Commission examined trends and future installation requirements. It predicted that future training will become more land-intensive. Improvements in military weapon systems and larger training exercises will continue to require more training land than in the past.

In its December 1988 report, the Base Realignment and Closure Commission stated a primary concern with many installations' capability to fulfill their defined missions. The report advised that closure plans must consider a facility's availability, quality, quality of life, and community support. Although the Commission set no cost savings goals, the 1988 report estimated that base closures could yield an annual savings of $693.6 million and a 20-year savings of $5.6 billion (net present value).

2.2 BRAC Environmental Evaluation Requirements

In 1988, the Secretary of Defense requested and received exemptions to certain provisions of NEPA (Commission, December 1988). Congress agreed that NEPA did not apply to decisions of the Defense Secretary's Commission on Base Realignment and Closure. Therefore, during the decision phase, the Commission did not have to consider NEPA while selecting installations for closure or realignment. The Commission did, however, incorporate environmental considerations as one of its criteria for decision-making.

Under the Base Realignment and Closure Act, during the implementation phase, the Defense Secretary was not required to consider:

* The need for closing or realigning a military installation selected for closure or realignment by the Commission

* The need for transferring functions to another military installation selected as the receiving installation

* Alternate military installations to those selected for closure and transfer.

NEPA does not apply to the **decision** to close or realign a base, but it does apply to the **implementation** of those decisions. The Base Realignment and Closure Act limits civil action (lawsuit) against the government on environmental grounds. It states that any act required by NEPA, but not carried out, cannot be brought under civil action later than 60 days after the action.

2.3 The Status of Base Realignment and Closure

The Assistant Secretary of the Army for Installations, Logistics, and Environment (ASA, IL&E) defined the terminology and status of various Army BRAC efforts in a 27 February 1991 briefing before the Military Installations and Facilities subcommittee of the House Armed Services Committee. The Commission's decision, announced in December 1988, as mandated by Public Law 100-526, is referred to as BRAC I. This affects 133 Army installations: 76 will close, 57 will realign (Livingstone, February 1991). Although a complete procedural NEPA process was waived by Public Law, the Commission did employ an environmental methodology to support the decision-making process (Lozar, December 1988). To implement BRAC I decisions, 27 environmental documents have been prepared: 12 EISs, 14 Environmental Assessments (EAs), and one Programmatic EA (Table 2-1).

On 29 January 1990, Secretary of Defense Cheney announced proposals for additional realignments and closures. This is referred to as BRAC II. There is no exemption to NEPA in BRAC II and alternative actions must be evaluated in the environmental analysis and documentation process. These proposals reflected the Army's initial transition into a smaller, more streamlined organization. This announcement proposed reducing the Army from a 5 corps, 28 division force to a 4 corps, 23 division force. BRAC II did not include any Outside Continental United States (OCONUS) realignments or closures.

BRAC III was announced to meet Congressional concerns about OCONUS realignment and closures. OCONUS installations were not included in BRAC II because at the time, Conventional Forces Europe Treaty negotiations were ongoing and were expected to cover the European force structure. This element was eliminated from the talks and therefore, on 18 September 1990, Secretary Cheney announced drawdowns in overseas forces. The BRAC III proposals included closure or reduction of operations at 113 Army facilities overseas. BRAC III was the initial transition to a smaller force overseas.

Table 2-1 BRAC I Environmental Documentation Milestones (Livingstone, February, 1991)

Environmental Impact Statement	Completion Date
Fort Dix	Jul 90 (A)
Fort Devens-Fort Huachuca	On Hold
Presidio of San Francisco	May 91
Fort Sheridan	Feb 91 (A)
Fort Douglas	Mar 91
Fort Meade	Jul 91
Army Material Technology Laboratory	Sep 91
Jefferson Proving Ground	Sep 91
Cameron Station-Fort Belvoir	Jun 91
Umatilla-Navajo-Fort Wingate-Hawthorne AAP	Sep 91
Pueblo Depot Activity	Sep 91
Lexington-Bluegrass Army Depot	Sep 91

Environmental Assessment	Completion Date
Hamilton Army Airfield	Mar 91
USARC Gaithersburg	Jun 91
New Orleans Military Ocean Terminal	Apr 91
Tacony Warehouse	Apr 91
Fort Des Moines	Apr 91
NG Bennett	Oct 91 (A)
NIKE Kansas City 30	Apr 91
DMA Herndon	Jul 91
Coosa River Storage Annex	Feb 91
Kapalama	Apr 91
Cape St. George	Apr 91
Indiana AAP	Mar 91
Pontiac Storage	Mar 91
NIKE Aberdeen	Mar 91

Programmatic Environmental Assessment	Completion Date
Stand-Alone Housing	Mar 90 (A)

(A) = Actual

2.4 Analysis of BRAC I

"The BRAC program, because of its complexity (both in terms of numbers of players and actions), political visibility, and timeline requirements, [has] strained the Army's ability to execute the NEPA process as smoothly and efficiently as desired" (Fee, 1991). The Base Closure and Realignment Act of 1988 (Public Law 100-526) requires the Army to begin implementing the Commission's December 1988 (BRAC I) decisions for base realignment and closure by 30 September 1991 and to complete these actions by 30 September 1995. The Act also requires that before implementation begins, the Army must consider the environmental consequences of the implementation proposal with respect to the provisions of NEPA.

As BRAC implementation proposals change, environmental analysis and documentation in progress must be modified. The rigorous nature of the environmental analysis process often causes the modifications to the analysis and documentation to lag behind. Estimates suggest that approximately $10 million may have already been invested in BRAC I environmental analysis and documentation. At an estimated cost of $50,000 per EA, and $200,000 to $800,000 per EIS, costs accumulate quickly (Miller, December 1990).

The February 1989 Implementation Plan for BRAC I assigned roles and responsibilities to various organizations, including the MACOMs, Office of the Chief of Engineers (OCE), Assistant Chief of Engineers Base Realignment and Closure Office (ACE BRACO), Directorate of Management Base Realignment and Closure Office (DM BRACO), BRAC Steering Committee, Corps of Engineers Divisions and Districts, and the Office of the Assistant Secretary of the Army for Installations, Logistics, and Environment (OASA, IL&E) (Hamilton, February 1989). Proponency was assigned to the MACOMs, however, the responsibility for preparing environmental analyses and documentation was assigned through channels to the Corps of Engineers district offices to take advantage of their expertise and experience. To speed the preparation, funds

were made available through ACE BRACO to the districts. ACE BRACO is responsible for participating in the review process and for providing guidance on priority dates. DM BRACO is responsible for participating in the review process and for providing guidance to the MACOMs. The Steering Committee is responsible for providing guidance to the MACOMs and for interpreting evolving policy and guidance. The OASA (IL&E) is the final decision-maker with authority to sign the ROD. Staff members from this organization were also involved in the review process.

In BRAC I, each MACOM's role was unclear. Information often flowed unevenly within Headquarters Department of the Army and from Headquarters to the MACOMs. To some, the districts served as contract officers who monitored environmental analysis and documentation preparation, adding yet another coordination and management layer to the process (Fee, January 1991, Yentzer, February 1991). Installation environmental offices had no official role in environmental analysis and at times were overlooked. The data for analysis resides at the installation.

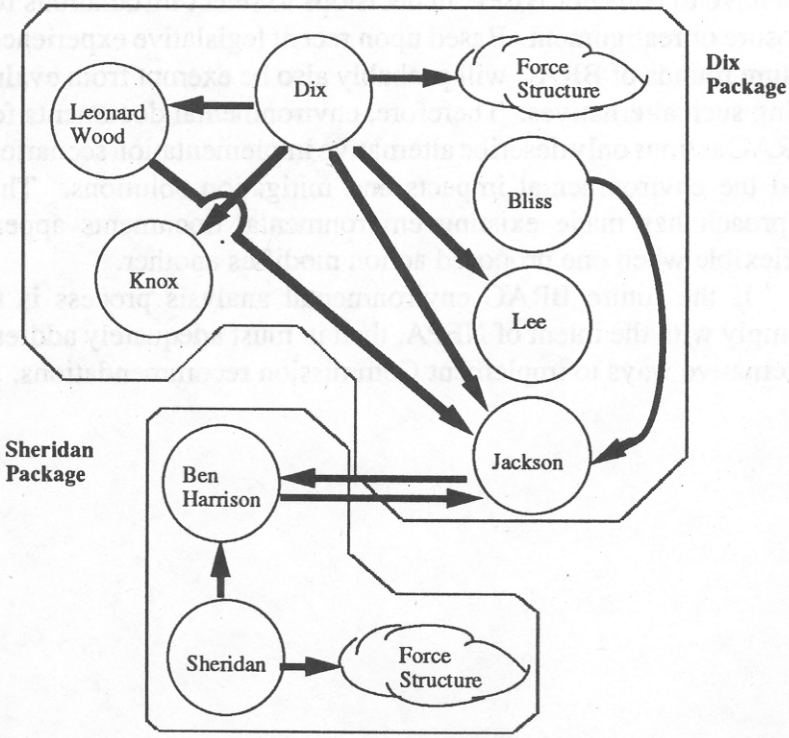
To satisfy the applicable NEPA requirements, Environmental analysis on the implementation proposals began immediately following the December 1988 BRAC I announcements. This environmental analysis predicts the effects of the proposed action relative to "no action," that is, the conditions present if the installation remains in its current status, and to examine alternative ways to implement the action (e.g., closure or movement of units or activities). The environmental document recommends ways to offset negative impacts, but it does not evaluate alternative closure or realignment decisions. There is limited discussion of whether or not the action will be implemented because the action is required by law. Discussion involves only the best method to implement the action, the effects of the action on a variety of issues including the local community and the environment, and how negative impacts may be mitigated.

The quality of environmental baseline information controls the quality of environmental analysis. This information is directly related to the time and effort given to data collection. For example,

due to a lack of baseline data, one Draft Environmental Impact Statement (DEIS) incorrectly concluded that there were no endangered species on post. Another EIS frequently referred to a "reported cemetery" on post, but never documented its existence.

Also, BRAC I environmental documents are "packaged" to group connected actions and related movements as shown in Figure 2-1. Even when an installation sends units or activities to many different installations, there are only a few pages devoted to impacts at the receiving installation. Often there is limited analysis of cumulative impacts upon receiving installations.

Figure 2-1 Packaging Example



2.5 BRAC 90 and Beyond

To avoid past problems, the Army needs new strategies to implement NEPA for BRAC. While many of these are common problems that occur in preparing non-BRAC environmental analyses and documents, they complicate the BRAC process as well.

NEPA implementation for BRAC is a dynamic process that may be re-defined for each round of base realignment and closure. Public Law 101-510, The National Defense Authorization Act for Fiscal Year (FY) 1991, requires biennial BRAC Commissions, where decisions are referred to as BRAC 91, 93, or 95. As in the Base Realignment and Closure Act of 1988, these commissions do not have to consider NEPA in decisions to select installations for closure or realignment. Based upon recent legislative experience, future rounds of BRAC will probably also be exempt from evaluating such alternatives. Therefore, environmental documents for BRAC actions only describe alternative implementation scenarios, and the environmental impacts and mitigation solutions. This approach has made existing environmental documents appear inflexible when one proposed action modifies another.

If the future BRAC environmental analysis process is to comply with the intent of NEPA, then it must adequately address alternative ways to implement Commission recommendations.

3. Alternatives

Every policy analysis must consider alternative policy choices. Alternatives should minimize undesirable side-effects, recognize and address internal political realities, and produce information that will assist in further evaluations and decisions (MacRae, 1985). Once alternatives are articulated and analyzed, they should be judged by a stated evaluative criteria to provide a framework for future policy decisions.

This chapter describes alternative policy choices for the Army's BRAC EIAP. The alternatives analyzed in this chapter build upon those introduced at the symposium (listed in Appendix C). These alternatives represent a range of possible options that have been generated throughout the analytical process of this policy study.

3.1 Criteria

When presented with several options, a decision-maker needs some basis for choosing among them. What types of results does the decision-maker expect from a policy? What outcomes does the decision-maker value? How can the desired outcome be maximized, or undesirable consequences be minimized? These values can be expressed in terms of criteria for making a decision. When the criteria are articulated, they become the principle factors for decision-makers to choose the best policy. The policy alternatives can be analyzed and evaluated according to the criteria, providing a framework in which the decision-maker can make an informed choice based on expected results of various policy choices. For the environmental impact analyses of base realignment and closure implementation, there are three desirable criteria: BRAC-NEPA congruency, quality, and responsiveness.

3.1.1 BRAC - NEPA Congruency

The first criterion for policy choices is that base realignment

and closure requirements should be congruent with the NEPA process. In spite of misperceptions during BRAC I, these two legal requirements are neither contradictory nor at cross purposes (Conrad, February 1991). NEPA can and should be used within the context of BRAC to achieve better decisions. Any policy choice that can enhance BRAC and NEPA coordination would be valuable.

3.1.2 Quality

The second criterion for policy alternatives is quality. The value of environmental analyses produced under NEPA is directly proportional to the sufficiency, clarity, accuracy, and overall quality of the analysis and the resulting documentation. As stated before, NEPA is intended to produce excellent decisions, not create burdensome paperwork. A valuable policy choice is one which motivates quality throughout the environmental analysis process, and overcomes the perception that NEPA is an after-the-fact obstacle to federal actions.

3.1.3 Responsiveness

Finally, responsiveness is an essential criterion for making policy choices. Because of the sensitive nature of the BRAC process and other economic or military pressures, a BRAC environmental policy must be responsive, i.e. it must be timely and flexible. This is important to Army leadership, which must implement decisions in a dynamic milieu.

3.2 Analysis

Alternatives in this paper are grouped into the three categories of concern: managerial, methodological, or technical. Each category includes a status quo option that is to maintain the present course of action. Following each option, is a graphic depicting which, if any, of the three criteria that option meets. The heavily bordered boxes indicate that the criterion is satisfied. At the end of this

chapter, these options are summarized in Table 3-1.

3.2.1 Managerial

Managerial alternatives are those that affect resource and responsibility coordination. These include managing time, people, and money; managing the process; and responsibilities of the proponent, preparer, reviewers, and monitors. These alternatives include maintaining the status quo, building upon the existing implementation plan, creating a BRAC environmental analysis support team, coordinating with the installation master plan, separating sending and receiving actions, separating discrete implementation elements, packaging the implementation actions more broadly, and increasing environmental personnel.

Status Quo

The status quo managerial policy alternative is to continue with the current management method for the Army's overall BRAC environmental analysis process. This includes maintaining MACOM proponency (Walker, October 1989), channeling resources for environmental analyses through the Corps of Engineers for preparation (Hamilton, February 1989), using the BRAC Steering Committee to clarify procedural guidance (Shannon, January 1989), and packaging implementation actions into logical groups of connected actions (Shannon, January 1989). As discussed in various BRAC "Lessons Learned" conferences sponsored by OASA, IL&E, the current conditions require improved coordination between BRAC and NEPA. Also, the current conditions have sometimes resulted in inconsistent decisions, which do not meet the decision-maker's needs in a timely way. Therefore, this option does not fully satisfy any of the criteria.

Status Quo	BRAC-NEPA Congruency	Quality	Responsiveness

Implementation Plan

One policy option is to build upon the framework of the existing implementation plan. As stated in Chapter 2, the Office of the Secretary of the Army issued an implementation plan in February 1989 to manage the BRAC I implementation (Hamilton, February 1989). Similar plans will need to be issued to describe implementation of future BRAC actions. These implementation plans should further define: proponency, resource allocation, staffing, the review process and disposal and remediation obligations and responsibilities. Clarifying ambiguities in the previous implementation plan will improve the quality of the BRAC environmental process, and make the process more responsive by clearly outlining responsibilities and expectations.

Implementation Plan	BRAC-NEPA Congruency	Quality	Responsiveness

Support Team

As a policy alternative, the Army leadership could establish a BRAC environmental support team, an advisory group that could provide technical advice as needed throughout the environmental analysis process. The BRAC I Steering Committee represented various organizations and was able to clarify guidance informally when procedural questions arose. However, it was also used to solve substantive problems identified in the review process of environmental documentation. Critical and constructive technical review is valuable early in the environmental analysis process and a support team could provide this service. Such a team could do much to provide congruency between the NEPA process and BRAC requirements by serving as the interface or interpreter between Army mission and environmental requirements. It also has potential for improving the quality of analysis and documentation, and contributing to greater responsiveness, therefore it rates highly on all three criteria. Fully implementing the support team strategy may require reallocating some existing resources. However, implementing a support team to ensure quality control in the earliest stages of a draft EIS is anticipated to reduce delays and costs

during the BRAC NEPA process.

Support Team	BRAC-NEPA Congruency	Quality	Responsiveness

Master Plan Coordination

Another policy alternative is to coordinate the installation master plan with environmental analyses and documentation generated in response to BRAC actions. AR 200-2 states that environmental considerations included in Army environmental analyses and documentation should be integrated into installation master planning documents and other component management plans. The installation master plan gives the installation commander a tool to manage and develop installation real property resources (i.e. land and facilities) to accomplish assigned and projected missions. The master plan is intended to provide orderly installation development and to promote future installation viability. EISs can be excellent sources of information to describe future changes and corresponding environmental consequences at the installation. Therefore, integrating an EIS into the installation master plan can improve the quality of the analyses and recommendations of the master plan by implementing the recommendations and mitigation measures of the EIS. This direct link between the two documents will help to make the purpose and intent of NEPA congruent with BRAC requirements.

Master Plan Coordination	BRAC-NEPA Congruency	Quality	Responsiveness

Separate Sending and Recieving Action

Another policy option is to conduct separate environmental analysis at the sending and at the receiving installation. This would help to manage the complex set of BRAC actions while remaining sensitive to the purpose of BRAC environmental impact analysis: to evaluate the environmental effects in a given region of a proposed action, and to propose mitigation measures to offset negative impacts. This option logically correlates BRAC requirements with the NEPA process, and would yield better quality

analyses of cumulative environmental effects at the receiving installations. It would also allow the analysis and documentation of closing and realigning to proceed independently, thereby making the process more efficient.

Separate Sending and Receiving Actions	BRAC-NEPA Congruency	Quality	Responsiveness

Separate Discrete Implementation Elements

An alternative to the current packaging of connected actions is to separate the overall action into smaller, discrete elements. For example, each element of an action at a closing installation could require several environmental documents. Elements might include moving activities away from the installation, ceasing military activity at the site, requiring remediation and restoration, disposing of real property to the private sector, and reusing real property. This would create much more environmental documentation, but each document would be smaller and more focused. If the environmental analysis and documentation for one component took longer to complete than another, it could proceed relatively independently without interfering with the progress of other components. Separating to this extreme may create more complexities than necessary, and may not effectively address cumulative impacts. However, it would provide some congruency between the NEPA process and BRAC requirements, and therefore satisfies that criterion.

Separate Discrete Implementation Elements	BRAC-NEPA Congruency	Quality	Responsiveness

Package Implementation Actions Broadly

Conversely BRAC actions could be packaged even more broadly than was done for BRAC I. This programmatic approach may involve only one or two environmental documents for an entire BRAC round and would encompass many analyses for the various component actions at all the affected installations. This would be an extremely complex management task and would require close coordination of many interrelated sub-actions. This

alternative would also provide some congruency between the NEPA process and BRAC requirements, and therefore satisfies that criterion.

Package Implementation Actions Broadly	BRAC-NEPA Congruency	Quality	Responsiveness

Increase Environmental Staffing

To improve quality control, policy guidance could increase the number of authorized staff positions at Corps of Engineers district offices, MACOMs, U.S. Army Toxic and Hazardous Materials Agency and also at the installations. This may provide adequate staff to prepare and review environmental analyses and documentation, so that the BRAC environmental requirements could be met in a more timely manner. However, this guidance may create managerial problems regarding hiring and training and may leave those offices underfunded after the BRAC requirements are completed.

Increase Environmental Staffing	BRAC-NEPA Congruency	Quality	Responsiveness

3.2.2 Methodological

Methodological policy alternatives include the Army's approaches to environmental impact analysis studies associated with implementating base realignment and closure decisions. These alternatives include: maintaining the status quo, framing the proposed action more broadly, using boundary analysis, doing a carrying capacity analysis, examining the environmental considerations of reuse, writing programmatic EISs, and tiering the BRAC environmental analysis process.

Status Quo

The methodological policy option to maintain the status quo means continuing with the current Army BRAC environmental impact analysis study methodology, by conducting environmental analyses based on the precise personnel numbers, timing and

NEPA process. This option also improves the responsiveness of the environmental document since it allows preparers to quickly identify the significance of changes to the proposed action. It can also improve the quality of the analysis, since it shows where a particular analysis still applies to a changed proposed action.

Boundary Analysis	BRAC-NEPA Congruency	Quality	Responsiveness

Carrying Capacity Analysis

Another policy alternative for preparing BRAC environmental analyses is to use a carrying capacity method. Carrying capacity is the "maximum rate of resource consumption and waste discharged that can be sustained indefinitely in a defined planning region without progressively impairing bioproductivity and ecological integrity" (Rees, 1988). This method allows environmental analyses to examine the full range of activities or uses that natural and human systems can accommodate. Analysts can then evaluate various realignment or closure scenarios with relative ease. This alternative satisfies all three criteria by using the NEPA process to inform the BRAC process by providing realistic baseline information and by expediting later phases of analysis by laying a foundation for determining natural and human resource carrying capacity. Implementation would require considerable time and money.

Carrying Capacity	BRAC-NEPA Congruency	Quality	Responsiveness

Environmental Considerations for Reuse

Consistent examination of environmental considerations for reuse is yet another alternative. Cleaning up environmental hazards and potential reuse of Army facilities are sensitive issues for the community surrounding an installation scheduled for closure. While it is not possible for the Army to specify a definitive reuse plan for the installation, it is important for the community to understand that the Army will meet its obligation to remediate environmental hazards existing on its land. Because it has managed the land and facilities for many years, the Army also can provide

information regarding environmental considerations and inherent suitabilities for reuse. Local communities and the DoD Office of Economic Adjustment (OEA) can then use this information to develop specific reuse plans. This alternative satisfies all three criteria by coordinating the BRAC closure and disposal requirements with the public involvement responsibilities and other NEPA requirements. It makes a more sufficient document that includes environmental considerations for reuse, and enhances the document's responsiveness to the public's concerns and decision maker's needs.

Environmental Considerations for Reuse	BRAC-NEPA Congruency	Quality	Responsiveness

Programmatic EIS

Another policy approach to the BRAC environmental analysis process is to use a programmatic EIS to address the broad environmental consequences of the entire BRAC round. This programmatic EIS would help to incorporate environmental considerations in the early planning stages of proposed base realignments and closures. It would also serve as a supporting document for the site-specific environmental documents by investigating major issues, and allowing the site-specific EIS to focus on issues specific to the subsequent actions. This alternative also satisfies all three criteria by integrating environmental considerations early in the BRAC process, providing useful information regarding sensitive environmental issues, and addressing overall concerns at the macro level, so they need not be repeated at the site-specific level.

Programmatic EIS	BRAC-NEPA Congruency	Quality	Responsiveness

Tiering the BRAC Environmental Analysis Process

A tiered method for environmental analysis in BRAC could proceed from the macro to the micro level, each tier building on the previous one. Tiering includes creating a programmatic EIS for the entire round of BRAC, a carrying capacity analysis for each receiving installation to predict the impacts of alternative realign-

ment scenarios, and doing a site-specific environmental analysis focusing on the pertinent environmental issues of the proposed sending or receiving action.

Tiering	BRAC-NEPA Congruency	Quality	Responsiveness

3.2.3 Technical

Technical policy alternatives have to do with systems, technologies, and tools to be used in the environmental impact assessment study process. These alternatives include: staying with the status quo, using the Economic Impact Forecast System (EIFS), the Environmental Early Warning System (EEWS), the Integrated Training Area Management (ITAM) Program and developing an integrated automated data system.

Status Quo

The status quo technical policy option is to continue using systems and tools for the environmental analysis process on an ad hoc basis. Where made available to preparers, various systems were employed in the environmental analysis process for BRAC. However, of all the systems, only EIFS was used uniformly and consistently throughout the Army's environmental analysis processes. The General Accounting Office commended the Army for its consistent use of EIFS for examining socio-economic impacts of base realignment and closure. However, more consistent techniques in other areas of environmental impact analyses are needed. Randomly applying different analytical techniques and tools produces documents with inconsistent quality and responsiveness and that are not uniform. It also may demonstrate a lack of sensitivity to the unique requirements of NEPA in the BRAC context.

Status Quo	BRAC-NEPA Congruency	Quality	Responsiveness

Economic Impact Forecast System (EIFS)

The Army has already achieved a consistent use of EIFS as a tool in the socio-economic analysis of Army base realignment and closures. This system contains a predictive impact model and demographic data on the county level, nationwide. Continued use of this system will ensure quality analyses that are responsive to the decision maker's needs.

Economic Impact Forecast System	BRAC-NEPA Congruency	Quality	Responsiveness

Environmental Early Warning System (EEWS)

Using the EEWS for major installations throughout the BRAC environmental analysis process provides another alternative. EEWS is a computerized system that evaluates environmental impacts of realignment scenarios. With modifications, the EEWS could be used to accommodate the environmental information requirements for BRAC and also to provide greater flexibility in evaluating alternative realignment actions. These modifications may require significant resources to implement.

Environmental Early Warning System	BRAC-NEPA Congruency	Quality	Responsiveness

Integrated Training Area Management (ITAM) Program

Another technical policy option is to fully implement the ITAM Program Army-wide. This program provides a technique to improve baseline information at installations, and a systematic method to determine the carrying capacity of training lands. Implementing this policy alternative meets the quality and responsiveness criteria by allowing a more flexible analysis with greater baseline information.

Integrated Training Area Management Program	BRAC-NEPA Congruency	Quality	Responsiveness

Integrated Automated Data System

Another policy option is to develop a new, integrated, automated data system that would focus specifically on the environ-

mental data and analysis requirements of BRAC. This system could reside on a mainframe computer at a centralized facility responsible for preparing all BRAC environmental documents. Staffing and funding requirements would be significant to develop the system and collect requisite baseline data for system input. This system would ensure consistent analysis and compatible levels of baseline data across all Army installations, specifically for BRAC.

Integrated Automated Data System	BRAC-NEPA Congruency	Quality	Responsiveness

Policy alternatives relative to the evaluation criteria described in Section 3.2 are summarized in Table 3-1. Those alternatives which satisfy at least two of the criteria are further explored and developed into strategies in Chapter 4.

Table 3-1 Policy Alternatives Relative to Evaluation Criteria

	NEPA-BRAC Congruency	Quality	Responsiveness
Managerial			
Status Quo			
Implementation Plan	■		■
Support Team	■	■	■
Master Plan Coordination	■	■	
Separate Sending and Receiving Actions	■	■	■
Separate Discrete Implementation Elements	■		
Package Implementation Actions Broadly	■		
Increase Environmental Staffing			■
Methodological			
Status Quo			
Framing Proposed Action	■	■	■
Boundary Analysis	■	■	■
Carrying Capacity	■	■	■
Environmental Considerations for Reuse	■	■	■
Programmatic Environmental Impact Statement	■	■	■
Tiering	■	■	■
Technical			
Status Quo			
Economic Impact Forecast System	■	■	■
Environmental Early Warning System	■	■	
Integrated Training Area Management Program	■	■	■
Integrated Automated Data System	■		

Key: ■ Criteria Satisfied □ Alternative Does Not Satisfy Criteria

and closure requirements should be congruent with the NEPA process. In spite of misperceptions during BRAC I, these two legal requirements are neither contradictory nor at cross purposes (Conrad, February 1991). NEPA can and should be used within the context of BRAC to achieve better decisions. Any policy choice that can enhance BRAC and NEPA coordination would be valuable.

3.1.2 Quality

The second criterion for policy alternatives is quality. The value of environmental analyses produced under NEPA is directly proportional to the sufficiency, clarity, accuracy, and overall quality of the analysis and the resulting documentation. As stated before, NEPA is intended to produce excellent decisions, not create burdensome paperwork. A valuable policy choice is one which motivates quality throughout the environmental analysis process, and overcomes the perception that NEPA is an after-the-fact obstacle to federal actions.

3.1.3 Responsiveness

Finally, responsiveness is an essential criterion for making policy choices. Because of the sensitive nature of the BRAC process and other economic or military pressures, a BRAC environmental policy must be responsive, i.e. it must be timely and flexible. This is important to Army leadership, which must implement decisions in a dynamic milieu.

3.2 Analysis

Alternatives in this paper are grouped into the three categories of concern: managerial, methodological, or technical. Each category includes a status quo option that is to maintain the present course of action. Following each option, is a graphic depicting which, if any, of the three criteria that option meets. The heavily bordered boxes indicate that the criterion is satisfied. At the end of this

chapter, these options are summarized in Table 3-1.

3.2.1 Managerial

Managerial alternatives are those that affect resource and responsibility coordination. These include managing time, people, and money; managing the process; and responsibilities of the proponent, preparer, reviewers, and monitors. These alternatives include maintaining the status quo, building upon the existing implementation plan, creating a BRAC environmental analysis support team, coordinating with the installation master plan, separating sending and receiving actions, separating discrete implementation elements, packaging the implementation actions more broadly, and increasing environmental personnel.

Status Quo

The status quo managerial policy alternative is to continue with the current management method for the Army's overall BRAC environmental analysis process. This includes maintaining MACOM proponency (Walker, October 1989), channeling resources for environmental analyses through the Corps of Engineers for preparation (Hamilton, February 1989), using the BRAC Steering Committee to clarify procedural guidance (Shannon, January 1989), and packaging implementation actions into logical groups of connected actions (Shannon, January 1989). As discussed in various BRAC "Lessons Learned" conferences sponsored by OASA, IL&E, the current conditions require improved coordination between BRAC and NEPA. Also, the current conditions have sometimes resulted in inconsistent decisions, which do not meet the decision-maker's needs in a timely way. Therefore, this option does not fully satisfy any of the criteria.

Status Quo	BRAC-NEPA Congruency	Quality	Responsiveness

Implementation Plan

One policy option is to build upon the framework of the existing implementation plan. As stated in Chapter 2, the Office of the Secretary of the Army issued an implementation plan in February 1989 to manage the BRAC I implementation (Hamilton, February 1989). Similar plans will need to be issued to describe implementation of future BRAC actions. These implementation plans should further define: proponency, resource allocation, staffing, the review process and disposal and remediation obligations and responsibilities. Clarifying ambiguities in the previous implementation plan will improve the quality of the BRAC environmental process, and make the process more responsive by clearly outlining responsibilities and expectations.

Implementation Plan	BRAC-NEPA Congruency	Quality	Responsiveness

Support Team

As a policy alternative, the Army leadership could establish a BRAC environmental support team, an advisory group that could provide technical advice as needed throughout the environmental analysis process. The BRAC I Steering Committee represented various organizations and was able to clarify guidance informally when procedural questions arose. However, it was also used to solve substantive problems identified in the review process of environmental documentation. Critical and constructive technical review is valuable early in the environmental analysis process and a support team could provide this service. Such a team could do much to provide congruency between the NEPA process and BRAC requirements by serving as the interface or interpreter between Army mission and environmental requirements. It also has potential for improving the quality of analysis and documentation, and contributing to greater responsiveness, therefore it rates highly on all three criteria. Fully implementing the support team strategy may require reallocating some existing resources. However, implementing a support team to ensure quality control in the earliest stages of a draft EIS is anticipated to reduce delays and costs

during the BRAC NEPA process.

Support Team	BRAC-NEPA Congruency	Quality	Responsiveness

Master Plan Coordination

Another policy alternative is to coordinate the installation master plan with environmental analyses and documentation generated in response to BRAC actions. AR 200-2 states that environmental considerations included in Army environmental analyses and documentation should be integrated into installation master planning documents and other component management plans. The installation master plan gives the installation commander a tool to manage and develop installation real property resources (i.e. land and facilities) to accomplish assigned and projected missions. The master plan is intended to provide orderly installation development and to promote future installation viability. EISs can be excellent sources of information to describe future changes and corresponding environmental consequences at the installation. Therefore, integrating an EIS into the installation master plan can improve the quality of the analyses and recommendations of the master plan by implementing the recommendations and mitigation measures of the EIS. This direct link between the two documents will help to make the purpose and intent of NEPA congruent with BRAC requirements.

Master Plan Coordination	BRAC-NEPA Congruency	Quality	Responsiveness

Separate Sending and Recieving Action

Another policy option is to conduct separate environmental analysis at the sending and at the receiving installation. This would help to manage the complex set of BRAC actions while remaining sensitive to the purpose of BRAC environmental impact analysis: to evaluate the environmental effects in a given region of a proposed action, and to propose mitigation measures to offset negative impacts. This option logically correlates BRAC requirements with the NEPA process, and would yield better quality

analyses of cumulative environmental effects at the receiving installations. It would also allow the analysis and documentation of closing and realigning to proceed independently, thereby making the process more efficient.

Separate Sending and Receiving Actions	BRAC-NEPA Congruency	Quality	Responsiveness

Separate Discrete Implementation Elements

An alternative to the current packaging of connected actions is to separate the overall action into smaller, discrete elements. For example, each element of an action at a closing installation could require several environmental documents. Elements might include moving activities away from the installation, ceasing military activity at the site, requiring remediation and restoration, disposing of real property to the private sector, and reusing real property. This would create much more environmental documentation, but each document would be smaller and more focused. If the environmental analysis and documentation for one component took longer to complete than another, it could proceed relatively independently without interfering with the progress of other components. Separating to this extreme may create more complexities than necessary, and may not effectively address cumulative impacts. However, it would provide some congruency between the NEPA process and BRAC requirements, and therefore satisfies that criterion.

Separate Discrete Implementation Elements	BRAC-NEPA Congruency	Quality	Responsiveness

Package Implementation Actions Broadly

Conversely BRAC actions could be packaged even more broadly than was done for BRAC I. This programmatic approach may involve only one or two environmental documents for an entire BRAC round and would encompass many analyses for the various component actions at all the affected installations. This would be an extremely complex management task and would require close coordination of many interrelated sub-actions. This

alternative would also provide some congruency between the NEPA process and BRAC requirements, and therefore satisfies that criterion.

Package Implementation Actions Broadly	BRAC-NEPA Congruency	Quality	Responsiveness

Increase Environmental Staffing

To improve quality control, policy guidance could increase the number of authorized staff positions at Corps of Engineers district offices, MACOMs, U.S. Army Toxic and Hazardous Materials Agency and also at the installations. This may provide adequate staff to prepare and review environmental analyses and documentation, so that the BRAC environmental requirements could be met in a more timely manner. However, this guidance may create managerial problems regarding hiring and training and may leave those offices underfunded after the BRAC requirements are completed.

Increase Environmental Staffing	BRAC-NEPA Congruency	Quality	Responsiveness

3.2.2 Methodological

Methodological policy alternatives include the Army's approaches to environmental impact analysis studies associated with implementating base realignment and closure decisions. These alternatives include: maintaining the status quo, framing the proposed action more broadly, using boundary analysis, doing a carrying capacity analysis, examining the environmental considerations of reuse, writing programmatic EISs, and tiering the BRAC environmental analysis process.

Status Quo

The methodological policy option to maintain the status quo means continuing with the current Army BRAC environmental impact analysis study methodology, by conducting environmental analyses based on the precise personnel numbers, timing and

NEPA process. This option also improves the responsiveness of the environmental document since it allows preparers to quickly identify the significance of changes to the proposed action. It can also improve the quality of the analysis, since it shows where a particular analysis still applies to a changed proposed action.

Boundary Analysis	BRAC-NEPA Congruency	Quality	Responsiveness

Carrying Capacity Analysis

Another policy alternative for preparing BRAC environmental analyses is to use a carrying capacity method. Carrying capacity is the "maximum rate of resource consumption and waste discharged that can be sustained indefinitely in a defined planning region without progressively impairing bioproductivity and ecological integrity" (Rees, 1988). This method allows environmental analyses to examine the full range of activities or uses that natural and human systems can accommodate. Analysts can then evaluate various realignment or closure scenarios with relative ease. This alternative satisfies all three criteria by using the NEPA process to inform the BRAC process by providing realistic baseline information and by expediting later phases of analysis by laying a foundation for determining natural and human resource carrying capacity. Implementation would require considerable time and money.

Carrying Capacity	BRAC-NEPA Congruency	Quality	Responsiveness

Environmental Considerations for Reuse

Consistent examination of environmental considerations for reuse is yet another alternative. Cleaning up environmental hazards and potential reuse of Army facilities are sensitive issues for the community surrounding an installation scheduled for closure. While it is not possible for the Army to specify a definitive reuse plan for the installation, it is important for the community to understand that the Army will meet its obligation to remediate environmental hazards existing on its land. Because it has managed the land and facilities for many years, the Army also can provide

information regarding environmental considerations and inherent suitabilities for reuse. Local communities and the DoD Office of Economic Adjustment (OEA) can then use this information to develop specific reuse plans. This alternative satisfies all three criteria by coordinating the BRAC closure and disposal requirements with the public involvement responsibilities and other NEPA requirements. It makes a more sufficient document that includes environmental considerations for reuse, and enhances the document's responsiveness to the public's concerns and decision maker's needs.

Environmental Considerations for Reuse	BRAC-NEPA Congruency	Quality	Responsiveness

Programmatic EIS

Another policy approach to the BRAC environmental analysis process is to use a programmatic EIS to address the broad environmental consequences of the entire BRAC round. This programmatic EIS would help to incorporate environmental considerations in the early planning stages of proposed base realignments and closures. It would also serve as a supporting document for the site-specific environmental documents by investigating major issues, and allowing the site-specific EIS to focus on issues specific to the subsequent actions. This alternative also satisfies all three criteria by integrating environmental considerations early in the BRAC process, providing useful information regarding sensitive environmental issues, and addressing overall concerns at the macro level, so they need not be repeated at the site-specific level.

Programmatic EIS	BRAC-NEPA Congruency	Quality	Responsiveness

Tiering the BRAC Environmental Analysis Process

A tiered method for environmental analysis in BRAC could proceed from the macro to the micro level, each tier building on the previous one. Tiering includes creating a programmatic EIS for the entire round of BRAC, a carrying capacity analysis for each receiving installation to predict the impacts of alternative realign-

ment scenarios, and doing a site-specific environmental analysis focusing on the pertinent environmental issues of the proposed sending or receiving action.

Tiering	BRAC-NEPA Congruency	Quality	Responsiveness

3.2.3 Technical

Technical policy alternatives have to do with systems, technologies, and tools to be used in the environmental impact assessment study process. These alternatives include: staying with the status quo, using the Economic Impact Forecast System (EIFS), the Environmental Early Warning System (EEWS), the Integrated Training Area Management (ITAM) Program and developing an integrated automated data system.

Status Quo

The status quo technical policy option is to continue using systems and tools for the environmental analysis process on an ad hoc basis. Where made available to preparers, various systems were employed in the environmental analysis process for BRAC. However, of all the systems, only EIFS was used uniformly and consistently throughout the Army's environmental analysis processes. The General Accounting Office commended the Army for its consistent use of EIFS for examining socio-economic impacts of base realignment and closure. However, more consistent techniques in other areas of environmental impact analyses are needed. Randomly applying different analytical techniques and tools produces documents with inconsistent quality and responsiveness and that are not uniform. It also may demonstrate a lack of sensitivity to the unique requirements of NEPA in the BRAC context.

Status Quo	BRAC-NEPA Congruency	Quality	Responsiveness

Economic Impact Forecast System (EIFS)

The Army has already achieved a consistent use of EIFS as a tool in the socio-economic analysis of Army base realignment and closures. This system contains a predictive impact model and demographic data on the county level, nationwide. Continued use of this system will ensure quality analyses that are responsive to the decision maker's needs.

Economic Impact Forecast System	BRAC-NEPA Congruency	Quality	Responsiveness

Environmental Early Warning System (EEWS)

Using the EEWS for major installations throughout the BRAC environmental analysis process provides another alternative. EEWS is a computerized system that evaluates environmental impacts of realignment scenarios. With modifications, the EEWS could be used to accommodate the environmental information requirements for BRAC and also to provide greater flexibility in evaluating alternative realignment actions. These modifications may require significant resources to implement.

Environmental Early Warning System	BRAC-NEPA Congruency	Quality	Responsiveness

Integrated Training Area Management (ITAM) Program

Another technical policy option is to fully implement the ITAM Program Army-wide. This program provides a technique to improve baseline information at installations, and a systematic method to determine the carrying capacity of training lands. Implementing this policy alternative meets the quality and responsiveness criteria by allowing a more flexible analysis with greater baseline information.

Integrated Training Area Management Program	BRAC-NEPA Congruency	Quality	Responsiveness

Integrated Automated Data System

Another policy option is to develop a new, integrated, automated data system that would focus specifically on the environ-

mental data and analysis requirements of BRAC. This system could reside on a mainframe computer at a centralized facility responsible for preparing all BRAC environmental documents. Staffing and funding requirements would be significant to develop the system and collect requisite baseline data for system input. This system would ensure consistent analysis and compatible levels of baseline data across all Army installations, specifically for BRAC.

Integrated Automated Data System	BRAC-NEPA Congruency	Quality	Responsiveness

Policy alternatives relative to the evaluation criteria described in Section 3.2 are summarized in Table 3-1. Those alternatives which satisfy at least two of the criteria are further explored and developed into strategies in Chapter 4.

Table 3-1 Policy Alternatives Relative to Evaluation Criteria

	NEPA-BRAC Congruency	Quality	Responsiveness
Managerial			
Status Quo			
Implementation Plan	■		■
Support Team	■	■	■
Master Plan Coordination	■	■	
Separate Sending and Receiving Actions	■	■	■
Separate Discrete Implementation Elements	■		
Package Implementation Actions Broadly	■		
Increase Environmental Staffing			■
Methodological			
Status Quo			
Framing Proposed Action	■	■	■
Boundary Analysis	■	■	■
Carrying Capacity	■	■	■
Environmental Considerations for Reuse	■	■	■
Programmatic Environmental Impact Statement	■	■	■
Tiering	■	■	■
Technical			
Status Quo			
Economic Impact Forecast System	■	■	■
Environmental Early Warning System	■	■	
Integrated Training Area Management Program	■	■	■
Integrated Automated Data System	■		

Key: ■ Criteria Satisfied □ Alternative Does Not Satisfy Criteria

Table 4-3 Overview of Strategies

Strategy	Value
Managerial	
Implementation Plan	•Defines NEPA responsibilities •Efficient review process, fund allocation, time schedule
Support Team	•Quality control early and throughout in the NEPA process
Master Plan Coordination	•Integrates relevant information from Master Plan and BRAC environmental document •Mitigation and monitoring
Separate Sending and Receiving Actions	•Addresses cumulative impacts at receiving installation •Focuses environmental analysis on site-specific issues •Assists in signing BRAC I RODs
Methodology	
Framing Proposed Action	•Greater document flexibility when proposed action changes
Boundary Analysis	•Determines if additional environmental analysis is required when a proposed action changes
Carrying Capacity	•Determines impact significance •Evaluates direct/indirect impacts •Evaluates cumulative impacts
Environmental Considerations for Reuse	•Facilitates environmental compatibility after closure
Programmatic EIS	•Evaluates common environmental issues early in BRAC planning process •Encourages tailoring of site-specific environmental analysis
Tiering	•Streamlines BRAC EIAP •Allows site-specific EISs to focus on issues specific to the proposed action
Technical	
EIFS	•Standardized and proven system to forecast BRAC economic impacts
EEWS	•Identifies sensitive environmental issues •Aides in carrying capacity analysis
ITAM	•Determines environmental sensitivity of Army training areas

5. Implementation

5.1 Implementation Considerations

Publishing and distributing this paper will not guarantee that these strategies will be adopted into policy. Simply acknowledging issues or concerns seldom assures commitment to their solution. The need remains to mobilize a coalition of support, to resolve conflicts, and to gain consensus. As with any political interaction, there may be a time lag before these conditions are met (Rondinelli, 1973). Anticipating implementation pitfalls must be part of the policy analysis process. Few policies are self-executing and most policies, even simple ones, require a great deal of effort to be implemented. Policy makers usually do not implement policy themselves, but rely on implementers to carry out their policies. The Institute will assist in developing implementation strategies and will work with policy implementers.

This paper discussed many strategies for increasing the value and usefulness of environmental analysis and documentation within the BRAC process. In fact, it should be acknowledged that various Army offices are already implementing several of the recommended strategies. This policy analysis also compliments the report *Base Realignment and Closure "How-to" Manual for Compliance with The National Environmental Policy Act* being prepared to provide additional guidance for BRAC NEPA documentation. The following suggestions are intended to assist with implementing these and other recommended strategies Army-wide.

First, identify an implementer. The commitment to improve the substantive quality of environmental documents already exists in the Army. However, an implementer can serve as an advocate for the preferred strategies. The implementer ensures that strategies for improving the NEPA process are understood and implemented at all levels of the BRAC decision-making process. The candidate should be a person or persons who value the recommendations and hold a stake in the BRAC planning and implementation process.

Second, utilize research laboratories to provide necessary assistance. Several recommendations rely upon the Army environmental research laboratories becoming actively involved. Carrying capacity methodologies, boundary analysis techniques, and environmental baseline data identification/collection will require the Army's best environmental scientists. Baseline data, information systems, and methodologies may already exist, so the gaps may not be as great as originally discussed at the symposium. Further, these scientists are often well networked with other government and private scientists where information flows more informally and often more rapidly than through normal channels.

Third, to institutionalize the implementation strategies, a policy letter signed by the ASA (IL&E) is urged. This will confer official recognition, adoption, and broad distribution throughout the Army. This brief policy letter, signed by the ASA (IL&E) will incorporate by reference the preferred strategies conceived and presented in this study. In addition, supplemental instructions could be written to support the environmental impact analysis process.

Further, carefully study the feasibility of the proposed strategies and understand what will be necessary to carry them out. One feasibility model focuses on the degree of consensus among groups involved in or affected by the proposed strategies and the magnitude of change that the proposed strategy represents (Steiss, 1980). Those strategies that have high consensus/low change present few problems in implementation. On the other hand, those with low consensus/high change may be the least feasible. Ascertaining strategy feasibility should permit limited resources to be allocated to those strategies with the highest payback. One systematic approach used to analyze implementation feasibility is presented in Table 5-1.

Table 5-1 Implementation Evaluation

Rank each alternative on a scale of 1-5 for consensus and change. Then add the rankings of consensus and change to receive a total score to assess the feasibility for implementing each strategy.

Strategy	Consensus Low ← Mod. → High 1 2 3 4 5	Change Required Low ← Mod. → High 5 4 3 2 1	Total
Managerial			
Implementation Plan			
Support Team			
Master Plan Coordination			
Sending and Receiving			
Methodological			
Framing Proposed Action			
Boundary Analysis			
Carrying Capacity			
Environmental Consideration for Reuse			
Programmatic EIS			
Tiering			
Technical			
EIFS			
EEWS			
ITAM			

5.2 Timing

The alternative strategies discussed in this chapter have different time requirements for preparation and application. These alternative strategies address both existing BRAC I environmental documents and future BRAC rounds. The boundary analysis and sending/receiving strategies provide two techniques that can be applied to BRAC I environmental documentation that will help alleviate constraints to signing EIS RODs by the 30 September 1991 deadline. These suggestions along with those discussed in Chapter 4 are also intended for implementation in future BRAC rounds. A proposed framework for implementation is summarized in Table 5-2.

Table 5-2 Application Timing

	Timing					
Strategy	BRAC I	Future rounds planning stage	After list is made public	Scoping	Early in the EIS draft	When proposed action changes
Managerial						
Implementation Plan		⊕				
Support Team					⊕	
Master Plan Coordination					⊕	
Sending and Receiving	⊕	⊕				
Methodological						
Framing Proposed Actions					⊕	
Boundary Analysis	⊕					⊕
Carrying Capacity					⊕	⊕
Environmental Considerations for Reuse					⊕	
Programmatic EIS			⊕			
Tiering			⊕	⊕		
Technical						
EIFS				⊕		
EEWS		⊕		⊕		
ITAM				⊕		

6. Summary and Conclusion

6.1 Summary

The strategies presented in this paper outline ways to attain the letter and intent of the NEPA process while accomplishing BRAC mandates. Strategies focus on implementing the NEPA environmental impact analysis process within the context and support of the base realignment and closure procedures. These strategies provide a framework for decision-makers to:

* Improve existing EISs so their RODs may be signed and the proposed actions proceed

* Comply with NEPA while implementing Army Mission requirements

* Prevent impediments to future BRAC rounds.

Many of the issues and concerns identified in this policy analysis are interrelated. After synthesizing and evaluating the many complex issues, three broad areas of concern were identified for this policy analysis to address: managerial, methodological, and technical. Chapter 3 developed and evaluated alternatives for each area. Chapter 4 discussed those strategies that achieved at least two of the three evaluation criteria.

6.2 Conclusion

The preferred strategies discussed in Chapter 4 met at least two of the BRAC NEPA evaluation criteria: congruency, quality, and responsiveness. In addition, they specifically address managerial, methodological, and technical concerns. These strategies can support existing BRAC I environmental documents and future BRAC rounds. For example, the boundary analysis technique and the sending and receiving strategy provide an opportunity to sign

the RODs of BRAC I EISs by making the best use of invested resources. These strategies may also be implemented with the others outlined in Table 5-2 to improve future BRAC decision-making and overall environmental documentation and analysis quality. These strategies also:

* Meet mission objectives without significantly deteriorating the natural or human resources

* Increase flexibility to evaluate changing proposed actions

* Can evaluate the environmental consequences of alternative implementation scenarios for closure and realignment decisions

* Improve resource management

* Produce environmental analyses and documents tailored to pertinent environmental issues of the proposed action.

NEPA set forth obligations for environmental protection in federal decision-making. As with many federal laws, NEPA implementation was shaped by litigation. This created the perception of NEPA as a set of rigid procedural requirements. This perception combined with the requirements of BRAC, have magnified the difficulties in implementing NEPA.

Base realignment and closure is a dynamic and continuing political reality that must be accommodated. It is important to recognize that NEPA is a flexible process that allows many alternative strategies for addressing the constraints of realignment and closure. Tiering the process, developing a strong implementation plan, and developing environmental baseline information sources are just a few of the strategies to work within the BRAC requirements and overcome the difficulties in preparing environmental analysis. The strategies presented in this report provide a potential framework for decision-makers to implement the NEPA process within the constraints of BRAC.

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Appendix A

Study Coordination and Approval Form

Army Environmental Policy Institute, Champaign, Illinois

☒ *Action Required* Initiating Office / POC: Mr. Ray Clark

☐ *For Information Only* Date of Request: 19 Sep, 1990

AEPI POC: Mr. John Fittipaldi

BACKGROUND

In May 1988, the Defense Secretary's Commission on Base Realignment and Closure was chartered to recommend specific bases which could be realigned or closed. The Department of the Army initiated numerous Environmental Impact Statements designed to comply with the U. S. Army regulation (AR 200-2) for implementation of the National Environmental Policy Act (NEPA).

STUDY OBJECTIVE

To provide a facilitated forum of senior level environmental professionals in which to explore a systematic approach to full NEPA compliance while surmounting the current condition where a BRAC proposal consistently changes before the record of decision (ROD) can be accomplished. The outcome of this meeting will lead to an AEPI white paper which will explore options to close and realign Army installations while still complying with NEPA.

COORDINATION	SIGNATURE	ACTION	
ACE		☑ Concur	☐ Nonconcur
ASA, IL&E		☒ Concur	☐ Nonconcur
		☐ Concur	☐ Nonconcur
		☐ Concur	☐ Nonconcur
		☐ Concur	☐ Nonconcur
		☐ Concur	☐ Nonconcur

Appendix B

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Appendix C

BRAC NEPA Symposium Strategies

Scoring
1= most feasible
10 = least feasible

1. Define each BRAC proposal and carefully write a NEPA document to address that proposal (1.33 ave)

—This will address the "moving target problem"

—Define a broad range of activities and determine their impacts, e.g., impact of 100 additional troops, 1000 additional troops, 10,000 additional troops

—Include in the EIS a proposal to find new uses - seek public involvement

—Make EISs site-specific by identifying installation problems through public involvement, i.e., conduct scoping

—Move EIS responsibility to the installation

2. Create a programmatic EIS document (2.7 ave)

—Preparation time will be 3-6 months

—Document rationale for decisions

—Prepare guidance for tiered analysis of environmental impacts

—This would be used at the Commission level.

3. Create an umbrella description of criteria (4.2 ave.)

—Tailor environmental document

4. Move EIS responsibility to the installation (4.8 ave.)

Appendix C (continued)

5. Tailor NEPA EIS process (5 ave.)

—Tailor NEPA to the constraints and uncertainty of BRAC

—Determine environmental criteria with public involvement

6. Determine the environmental carrying capacity of all Army bases and incorporate that information into a programmatic EIS (5.33 ave.)

7. Ensure that the entity that will define the next round of BRAC proposals will receive and use as much useful environmental data as we can possibly generate (5.7 ave.)

—Create a systematic process to collect environmental data

8. Complete and update the Environmental Early Warning System.

—Incorporate issues pertinent to BRAC (6.2 ave)

9. Establish institutional arrangements to facilitate environmentally relevant strategies (6.56 ave.)

—Create a Pentagon planning group

—Create broader policy analysis and develop criteria for decision making

10. Prepare EAs first and then EISs (7.3 ave.)

— Prepare EA and EIS in all cases

—Create a stand alone socio-economic analysis as part of the EIS

—Incorporate socio-economic analysis into the EIS by reference

Appendix D

EEWS Sample User Input

Command?	Model	Typing model allows the system to simulate the movement of personnel and equipment out of Army installation(s).
Will the same units be moved	Yes	*Yes* moves the same units onto or off of the installation specified. *No* moves different units onto and/or off of the installation specified.
Unit type	U9003	This is the EEWS designation for the Army unit that will be moved
Number	1	This is the number of units to be moved. Positive number indicates units moving onto the installation and a negative number indicates units moving off of an installation.
Unit Type	Exit	Another unit type could be entered. Exit tells the system there are no more units to be added to the analysis
Installation	Ft. A	Name of installation unit is moving to.
Brief Summary	Yes	*Yes* displays a brief summary of the ramifications. *No* displays detailed information for individual topic areas.

Appendix D (continued)

EEWS Sample Output

Topic Area	Ft A
Housing	Problem
Coastal Zones	Problem
Schools	No Problem
Maneuver Area	Problem
Smokes/Obscurences	No Problem
Ranges Needed	Problem
Historical/Archeological	No Problem
Utilities	No Problem
Endangered Species	No Problem

List of Available Installations on EEWS

Yakima	McPherson
Wainwright	McCoy
Stewart	Irwin
Sheridan	Indiantown
Sam Houston	Hunter Liggett
Roberts	Hunter Army Air
Riley	Hood
Richardson	Greely
Presidio SF	Drum
Polk	Devens
Oakdale	Chaffee
Meade	Carson
Carson	Buchanan
Campbell	Bragg
Bullis	Bliss (TRADOC)
A.P. Hill	Benning (TRADOC)
Lewis	

Acronym Glossary

AAP	Army Ammunition Plant
ACE	Army Corps of Engineers
AEPI	Army Environmental Policy Institute
AR	Army Regulation
ASA	Assistant Secretary of the Army
BRAC	Base Realignment and Closure
BRAC-NEPA	Base Realignment and Closure relating to the National Environmental Policy Act
BRACO	Base Realignment and Closure Office
CERL	Construction Engineering Research Laboratory
CFR	Code of Federal Regulations
COL	Colonel
DEIS	Draft Environmental Impact Statement
DMA	Defense Mapping Agency
EA	Environmental Assessment
EESC	Executive Environmental Steering Committee
EEWS	Environmental Early Warning System
EIAP	Environmental Impact Assessment Process
EIFS	Environmental Impact Forecast System
EIS	Environmental Impact Statement
FORSCOM	Forces Command
FY	Fiscal Year
GRASS	Geographic Resource Analysis Support System
GSA	General Services Administration
HASC	House Armed Services Committee

Glossary (continued)

HQDA	Headquarters Department of the Army
IL&E	Installations, Logistics, and Environment
ITAM	Integrated Training Area Management
LTG	Lieutenant General
MACOM	Major Command
MAJ	Major
NEPA	National Environmental Policy Act
NG	National Guard
NOI	Notice of Intent
OASA	Office of the Assistant Secretary of the Army
OCE	Office, Chief of Engineers
OCONUS	Outside Continental United States
OEA	Office of Economic Assessment
PDEIS	Preliminary Draft Environmental Impact Statement
ROD	Record of Decision
USARC	United States Army Reserve Center

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