

Standard Operating Procedure (SOP)
IMHW-PWE No. 202

ENVIRONMENTAL ANALYSIS OF UNITED STATES ARMY, HAWAII (USARHAW) ACTIONS

Directorate of Public Works
United States Army Garrison, Hawaii
947 Wright Avenue, Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

**HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII
DIRECTORATE OF PUBLIC WORKS
SCHOFIELD BARRACKS, HAWAII 96857-5013**

**STANDARD OPERATING PROCEDURE (SOP)
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ENVIRONMENTAL ANALYSIS OF UNITED STATES ARMY, HAWAII (USARHAW) ACTIONS

1. Purpose. This SOP establishes procedures for implementing the National Environmental Policy Act (NEPA) requirements for all proposed United States Army, Hawaii (USARHAW) actions being developed, planned, and coordinated through the U.S. Army Garrison, Hawaii (USAG-HI) Directorate of Public Works (DPW).

2. References.

- a. National Environmental Policy Act of 1969
- b. Title 32 Code of Federal Regulations (CFR), Part 651

3. Scope. This SOP provides guidance for conducting and documenting environmental impact analysis of proposed actions by host and all tenant activities on USARHAW installations.

4. Legal Authority. The legal authority for this SOP is DPW SOP IMHW-PWA No. 129, Document Control Process for DPW Standard Operating Procedures (SOP) and Flowcharts, 8 April 2010.

5. Responsibilities.

a. DPW Environmental Division Chief.

(1) Ensures that proponents initiate NEPA analysis of proposed programs and projects early in the planning process.

(2) Ensures NEPA awareness and training is provided to staff, proponents, and document reviewers.

(3) Budgets resources to maintain NEPA oversight.

b. NEPA Program Manager.

(1) Advises proponents on selection, preparation, and completion of NEPA analyses and documentation.

(2) Develops and publishes local guidance and procedures.

(3) Assists proponents to identify issues, impacts, alternatives and mitigation.

(4) Assists in monitoring to ensure mitigation measures are followed.

(5) Reviews and approves Records of Environmental Consideration (RECs) and maintains a tracking log of REC requests.

(6) Staffs Environmental Assessments (EA) and Findings of No Significant Impact (FNSIs) for Army review, coordination, and approval.

(7) Prepares EAs upon approved request from activities outside of DPW.

(8) Follows up after approval of an REC or EA to ensure the proponents are complying with the intent of the document.

c. Proponent or DPW Project Manager/Engineer.

(1) Identifies the proposed action, purpose and need, and alternatives.

(2) Initiates environmental review of proposed actions early in the planning phase and coordinates with the DPW Environmental Division.

- (3) Funds and/or prepares NEPA documents.
- (4) Ensures adequate opportunities for regulatory agency and public review during planning phases.
- (5) Ensures NEPA analysis is prepared and staffed to comply with intent and requirements of federal laws and Army policy.
- (6) Funds and implements the decision including all mitigation and monitoring.
- (7) Maintains official record copy of NEPA analyses and documentation.
- (8) In cooperation with DPW Environmental Division, coordinates with public agencies, private organizations, and individuals as appropriate.

6. Administrative Policy. Proponents and DPW Project Managers will follow the procedures below to determine whether or not a proposed action requires an environmental analysis and, if so, what type of NEPA documentation is needed.

a. Step 1. The Army has determined that certain types of actions individually and cumulatively do not have a significant impact on the environment and are categorically excluded from environmental impact analysis. This list of Categorical Exclusions (CX) is found in Appendix B of 36 CFR 651.

(1) If the proposed action is similar to one of the listed CXs, apply the CX screening criteria found in 36 CFR 651.29. If the action meets all of the screening criteria, further environmental analysis is not necessary. It should be noted that some CXs require documentation via completion of an REC. If the CX requires further documentation via an REC, proceed to Step 2. If the CX that applies to the proposed action does not require documentation via an REC, no further action is necessary.

(2) If the proposed action is not categorically excluded, proceed to Step 3 and prepare an EA or proceed to Step 5 and initiate preparation of an EIS.

c. Step 2. Complete an REC using DPW Form 1, Record of Environmental Consideration. Make sure that all information requested is provided. It is very important to fully describe the proposed action and provide maps, drawings, contract specifications, or any other documents that would present a clear picture of what is being proposed. Incomplete or inadequately documented RECs will be returned without action. Proceed to Step 4.

d. Step 3. Prepare an EA following guidance found in 36 CFR 651. If the EA concludes that the proposed action will not have any significant impacts, a FNSI will be prepared. When requiring assistance, contact the USAG-HI, DPW, Environmental Division, NEPA Program Manager at Building 105, Wheeler Army Airfield, 808-656-3075. Proceed to Step 4.

e. Step 4. Forward completed draft RECs and EAs to the DPW Environmental Division for review, coordination, and approval action.

(1) For RECs: Normally processing of simple RECs will take two weeks for review, coordination, and approval for actions that do not require outside agency coordination. Those actions requiring outside agency review may take 60-90 days or potentially longer. The Chief of the DPW Environmental Division is the approving authority for RECs. Approval authority for RECs is delegated to the DPW NEPA Program Manager.

(2) For EAs: The NEPA Coordinator will staff the EA and draft FNSI through the appropriate members of the USARHAW staff for review and coordination, and subsequent approval by the USAG-HI Commander. This process will normally take four weeks. At a minimum, the Staff Judge Advocate will review all EAs and draft FNSIs prior to approval. Copies of the EA and draft FNSI will be forwarded to the State Office of Environmental Quality Control (OEQC) for public notice of the proposed action. The OEQC will publish a notice of the availability of the EA and draft FNSI for public review in their monthly publication. Following a 30-day public review period, the action can proceed if there are no concerns or unresolved issues raised, and the FNSI will be finalized and staffed prior to approval by the USAG-HI Commander. This process will normally take three weeks. Once the FNSI is approved, the proponent can proceed with the action.

g. Step 5. If it is concluded that the proposed action may result in significant environmental impacts, the proponent shall initiate preparation of an EIS in consultation with the DPW Environmental Division.

7. Abbreviations, Acronyms, and Special Terms. See Annex A.

8. Forms and Records.

a. Forms. This SOP prescribes the use of the following form: DPW Form 1, Record of Environmental Consideration.

b. Records of environmental review and impact analysis conducted for proposed actions, to include RECs, EAs and EISs, shall be maintained by the proponent. The DPW Environmental Division will also maintain copies of environmental review documents on file including digital copies.

9. Attachments.

a. Annex A, Acronyms, Abbreviations and Special Terms.

b. Enclosure 1, Flowchart

c. Enclosure 2, DPW Form 1, Record of Environmental Consideration.

Approval Block

Signature / Date	Name / job title / telephone number
Division Chief	Rhonda Suzuki Chief, Environmental Division 656-5790
Recommended by	Emory Hicks Administrative Officer 656-1055
Approved by	Kent Watase Director of Public Works 656-3056

Annex A: Acronyms, Abbreviations and Special Terms

Acronyms

CFR	Code of Federal Regulations
CX	Categorical Exclusion
DPW	Directorate of Public Works
EA	Environmental Assessment
EIS	Environmental Impact Statement
FNSI	Finding of No Significant Impact
NEPA	National Environmental Policy Act
OEQC	Office of Environmental Quality Control
REC	Record of Environmental Consideration
SOP	Standard Operating Procedure
USAG-HI	United States Army Garrison, Hawaii
USARHAW	United States Army, Hawaii

Abbreviations: This SOP does not generate any word abbreviations

Special Terms

a. Categorical Exclusions (CXs). Categorical exclusions are a list of actions that the Army has determined do not normally require an EA or an EIS. The Army has 42 CXs published in Appendix B or 32 CFR Part 651.

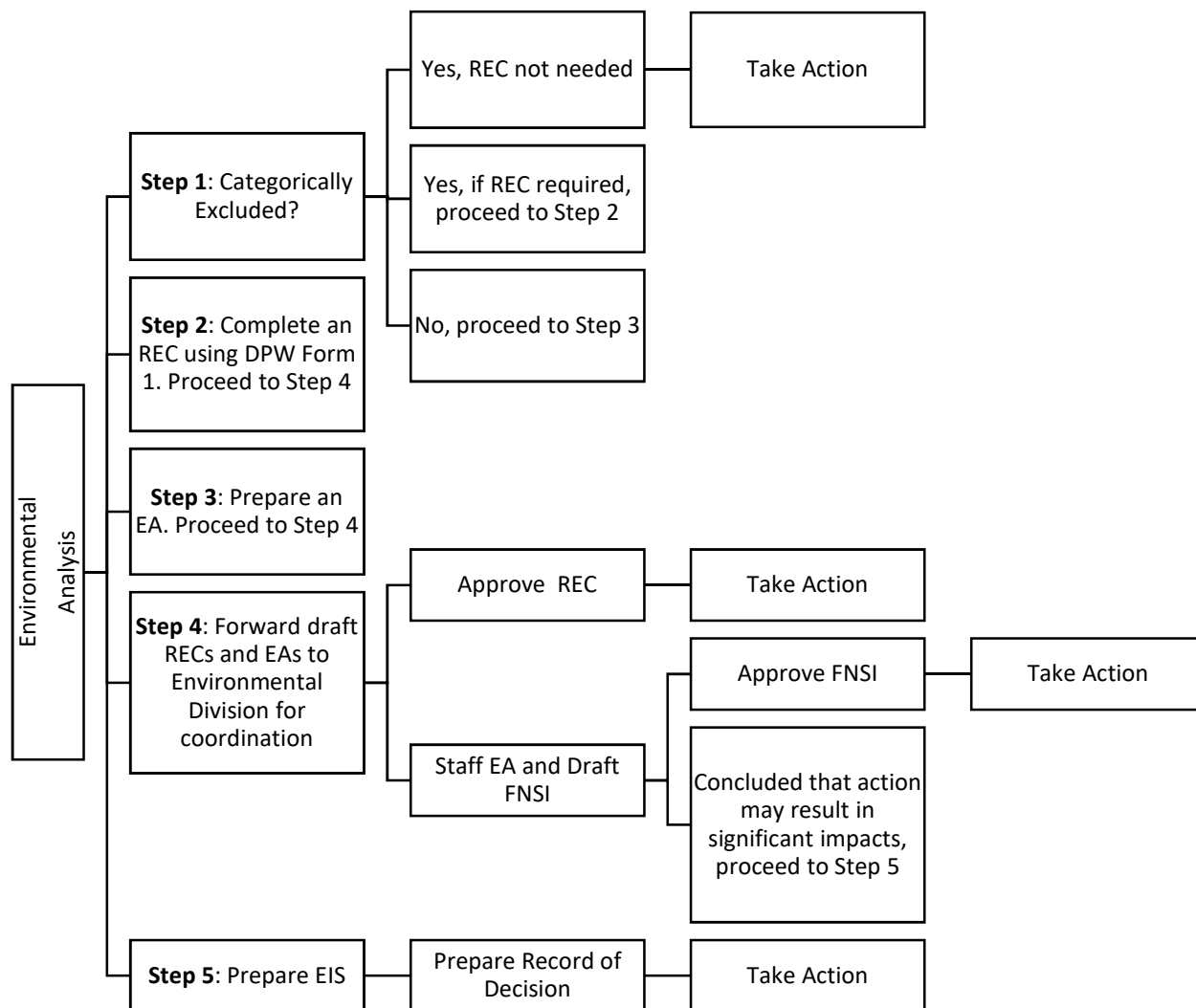
b. Environmental Assessment (EA). An EA is prepared to identify the environmental effects of a proposed action and to determine whether or not any of the impacts are significant. If it is determined the effects of a proposed action are not significant, a Finding of No Significant Impact (FNSI) is prepared and published. If the EA concludes that significant impacts may occur, an EIS is required. An EA can be completed in six to nine months; however, if done by contract, it will normally take much longer. The EA and FNSI are subject to a 30-day public comment period before the action can proceed.

c. Environmental Impact Statement (EIS). The determination that significant impacts will or may occur triggers the decision to prepare an EIS. The purpose of an EIS is to provide decision-makers and the public a complete and objective evaluation of significant environmental impacts (both beneficial and adverse) resulting from a proposed action and all reasonable alternatives. An EIS can be completed in 12-18 months; however, they usually take much longer due to extensive review and coordination required with State and Federal agencies, as well as the public. Public notices of the Draft EIS, Final EIS, and Record of Decision (ROD) are published in the Federal Register.

d. Proponent. The proponent is the organization that needs the proposed action to perform its mission. They are responsible for planning and implementing the proposed action, and the preparation of the necessary NEPA document. This includes clearly defining the proposed action and reasonable alternatives, ensuring all comments are addressed, and implementing the decision and any mitigation measures.

e. Record of Environmental Consideration (REC). An REC is a short document used by the Army to show that the environment has been considered in the planning process. It must conclude that a CX is applicable or the action is covered in an existing EA or EIS.

Environmental Analysis Flowchart



RECORD OF ENVIRONMENTAL CONSIDERATION

U.S. Army Garrison-Hawaii, Directorate of Public Works, Environmental Division

REC #:

REC CHECKLIST
(Check before submitting)

<input type="checkbox"/>	Detailed Project Description
<input type="checkbox"/>	Location Map and Plans
<input type="checkbox"/>	Date of Proposed Action
<input type="checkbox"/>	Reason for Categorical Exclusion
<input type="checkbox"/>	Impact Analysis Checklist

1. DATE: _____

2. SUBMITTED BY THE PROPONENT:

Name, Organization_____
Phone Number_____
Signature

3. DESCRIPTION OF PROPOSED ACTION:

Installation	Project Title	Location/Bldg No.	FEWR #

4. ESTIMATED START DATE & DURATION OF PROPOSED ACTION: _____

5. THIS ACTION HAS BEEN COORDINATED WITH THE FOLLOWING OFFICES/AGENCIES:

Office/Agency	Name(s)	Concur/Non-Concur

RECORD OF ENVIRONMENTAL CONSIDERATION

REC#

ENVIRONMENTAL IMPACT ANALYSIS (Any "YES" or "MAY" answers need to be explained in the "Discussion" section at the end of this checklist.)

YES NO MAY

1. AIR QUALITY

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a. Will the proposal cause air emissions such as smoke, dust, suspended particles, or air pollutants during construction or operations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Will the proposal involve the removal, modification, or addition of an air emitting device (e.g., boilers, generators, or refrigerant containing equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

2. WATER QUALITY

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a. Is the total disturbance of land over one acre? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Is the total area of new impervious surface over 5,000 square feet? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project involve an individual wastewater system (e.g., septic tank) or pretreatment unit (e.g., oil-water separator or grease trap)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

3. TOPOGRAPHY AND SOILS

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a. Will there be any land/ground disturbance (e.g., excavating, coring, digging, trenching, grubbing, dredging, excavation, or fence installation)? <i>Please specify total land disturbance acreage below in "Discussion."</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|

4. NATURAL RESOURCES

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a. Will the proposal affect undeveloped areas, affect endangered or threatened species or their habitat, occur in areas with known invasive species infestations, or affect plant or animal critical habitat? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Will the proposal require removal or trimming of trees? <i>Please provide map of tree location below in "Discussion."</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project involve soil importing/exporting? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

5. CULTURAL RESOURCES

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a. Will the proposed action involve alterations of existing buildings or structures? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Will the proposed action be located within or adjacent to a historic district? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Will the proposed action involve ground disturbance or occupancy in or near a known archaeological site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i. If yes/may, will archaeological work be needed? (Permit required) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

RECORD OF ENVIRONMENTAL CONSIDERATION

REC#

ENVIRONMENTAL IMPACT ANALYSIS (Any "YES" or "MAY" answers need to be explained in the "Discussion" section at the end of this checklist.)

YES

NO

MAY

6. LAND USE

- a. Will the proposal result in a change in operations, activities, or land use occurring at the site or facility?

☐
☐
☐

7. NOISE ENVIRONMENT

- a. Will there be any changes to the numbers, types, and operations of aircraft, vehicles, or weapon systems that could affect noise levels?

☐
☐
☐

8. TRAFFIC

- a. Will the proposal generate or increase vehicular traffic?
b. Will there be a requirement to construct, reroute or alter roadways?

☐
☐
☐
☐
☐
☐

9. HAZARDOUS MATERIALS/WASTE OR TOXIC SUBSTANCES

- a. Will the proposal result in the disturbance of lead containing paint or asbestos containing material?
b. Will the proposal result in the use, storage, or disposal of hazardous materials?
c. Will the proposal involve pesticide application (e.g., herbicide or insecticide)?

☐
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10. UTILITIES SYSTEMS

- a. Will the proposal require disposal or alterations to existing utility systems or drainage systems (e.g., power, drinking water, waste water, storm water)? *Please specify type of utility affected in "Discussion."*

☐
☐
☐

11. FLOODPLAIN

- a. Will the proposed action take place within the 100 year floodplain?

☐
☐
☐

RECORD OF ENVIRONMENTAL CONSIDERATION

REC#

DISCUSSION (*Annotate items answered "YES" or "MAY" and provide a brief explanation of the potential impacts and mitigation measures to be implemented. Provide answers to the questions of how much, whom, where, when, and how? Contact the DPW Environmental Division at usarmy.hawaii.nepa@mail.mil if assistance is needed.*)

Required Discussion:

RECORD OF ENVIRONMENTAL CONSIDERATION

REC#

THIS SECTION TO BE COMPLETED BY ENVIRONMENTAL DIVISION:

The Environmental Impact Analysis checklist was reviewed and potential impacts on the quality of the environment have been considered. It has been concluded that this action is not segmented and no extraordinary circumstances exist that would preclude the use of the applicable categorical exclusion identified in section below.

This document does not relieve the proponent from compliance with other applicable federal, state and local environmental laws and regulations.

REASON FOR USING RECORD OF ENVIRONMENTAL CONSIDERATION:

☐ Is adequately covered in the following EA/EIS titled:

Dated: _____

The EA/EIS may be reviewed at:

Or,

☐ Is categorically excluded under Appendix B, Section II, paragraph _____ of 32 CFR Part 651 for the following reason (See 32 CFR Part 651, Environmental Analysis of Army Actions):

RECORD OF ENVIRONMENTAL CONSIDERATION

REC#

REVIEW AND CONCURRENCES *(For Environmental Division use):*

	YES	WITH CMNT	NO	
<hr/> Natural Resources Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date
<hr/> Cultural Resources Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date
<hr/> IRP/MMRP Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date
<hr/> Clean Water Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date
<hr/> Clean Air/Safe Drinking Water Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date
<hr/> Recycling Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date
<hr/> Hazardous Waste Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date
<hr/> TSCA/SPCC/EPCRA Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date
<hr/> Other ENV Staff as needed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<hr/> Date

APPROVED BY:

Environmental Coordinator

Date

☐ *Concurrence is contingent upon compliance with comments provided.*