

SUBJECT: Review of Integrated Natural Resource Management Plan (INRMP)
National Environmental Policy Act (NEPA) Documentation

SEA 00T would like to extend its thanks to those activities responding to the recent survey requests regarding INRMPs and INRMP NEPA documentation status. There are currently six NAVSEA activities in various stages of preparing INRMP Environmental Assessments (EAs) that will involve SEA 00T and 00L review prior to preparation of Findings of No Significant Impact (FONSI)s. The following items briefly identify, clarify and discuss certain essential elements of INRMP EAs. Incorporating these suggested guidelines will enable SEA 00T and 00L to expedite their review of the EAs and issuance of the FONSI)s.

1. Statement of Proposed Action and Statement of Purpose and Need

ASN (I&E) INRMP NEPA guidance of 12 August 1998 and the CNO INRMP NEPA guidance of 30 November 1998 identify a statement of the proposed action and a statement of the purpose and need for action that is to be used in most instances in an INRMP NEPA document. Inclusion of these statements as contained in the guidance is important as they set forth the applicable requirements under the Sikes Improvement Act and the basis for the scope of the INRMP NEPA document.

2. Scope of Proposed Action and Alternatives

Consistent with the CNO INRMP NEPA guidance of 30 November 1999, the proposed action and each of the alternatives to the proposed action are to address the four management objectives of (1) forestry management, (2) fish and wildlife management, (3) land management, and (4) management for outdoor recreational opportunities. Even though one or more of these management objectives may be the same for the proposed action and each of the alternatives, the proposed action and each of the alternatives must still be described in terms of each of the four management objectives. EAs should not address only one or two of the management objectives simply because the remaining management objectives would be the same for the proposed action and each of the alternatives.

3. No Action Alternative

CNO INRMP NEPA guidance of 30 November 1999 provides guidance for describing the No Action Alternative when there is an existing natural resources management plan, and when there is no existing natural resources management plan. In addition, the guidance in discussing the viability of the No Action Alternative indicates "If the 'No Action' Alternative is not considered viable, this alternative should be eliminated in the Alternatives Section with an explanation why it does not meet Sikes Act requirements for an INRMP."

4. Range Activities

CNO INRMP NEPA guidance of 30 November 1999 requires that at the beginning of the Alternatives Section, all issues that relate to the military use of the property should be clearly defined, including issues that affect natural resources management. Some NAVSEA activities preparing INRMP NEPA documentation conduct ordnance/range activities that may require range management plans in accordance with Department of Defense (DoD) Directive 4715.11 (Environmental and Explosive Safety Management on Department of Defense Active and Inactive Ranges Located Within the United States). Currently, guidance pursuant to DoD Directive 4715.11 has not been issued regarding integrating range management planning with other installation planning processes.

In the absence of guidance regarding integrating range management planning with other installation planning process, INRMP EAs should at a minimum generally identify as part of the military use of property those ordnance/range activities that would be subject to DoD Directive 4715.11 and that could have natural resource implications. The identification of ordnance/range activities should not be exhaustive or comprehensive; instead, the identification should be more in keeping with acknowledging the presence of such activities. Additionally, INRMP EAs should also include a statement in either their Introduction or Alternatives Section indicating that future changes to the current military use of and practices affecting property would be subject to appropriate environmental analysis and review.

5. USFWS and Stakeholder INRMP Comments/Input

CNO INRMP NEPA guidance of 30 November 1999 requires that USFWS and public comments on an INRMP be addressed in the text of an EA, as appropriate, and that letters of concurrence/agreement be incorporated into an appendix of the EA. One method of fulfilling the requirement to address comments on the INRMP would be to include in the introductory or background section of the EA: (1) a brief description of the process used to elicit comments, if applicable; (2) identification of the USFWS and other stakeholders to whom the INRMP was provided for comment; and (3) a brief identification of the major comments received and the responses to these comments.