

Subj: NEPA DOCUMENTATION

Environmental Standard Operating Procedures (ESOP)	
National Environmental Policy Act (NEPA) Environmental Review Process	
Environmental Affairs: NEPA Program Manager (760)830-8190	Revised: 1 October 2024

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Ref: (a) 42 USC Chapter 55  
(b) 40 CFR Parts 1500 to 1508  
(c) 32 CFR Part 775  
(d) MCO 5090.2, Volume 12, Environmental Planning and Review  
(e) USMC NEPA Manual, Version 3.4  
(f) Commander's Guide to Environmental Management  
(g) CCO 5090.1J, Environmental Protection  
(h) CCO 3500.4M, Enclosure 1, Standard Operation Procedures for Range, Training Areas and Airspace (SOP for RTAA), Chapter 2  
(i) Final Supplemental Environmental Assessment for Ongoing and Future Military Training Activities, Support Operations, and Resource Management.

1. Purpose. This document provides instruction on the NEPA environmental review process at the Marine Air Ground Task Force Training Command, Marine Corps Air Ground Combat Center, Twentynine Palms, California. Following this process will ensure compliance with references (a) to (h).

2. Application. This guidance applies to all actions that either occur at the installation or are sponsored by the installation, including actions that take place off installation property but are funded or approved by the installation. These actions include policies, plans, programs, and projects with potential effects to the human environment (natural or physical) (40 CFR §1508.1(q)). Common actions subject to the NEPA environmental review process at the installation include new construction, alteration of facilities, real property management, implementation of plans such as the Master Plan, and alterations to ranges or changes in training operations such as changing existing airspace use or expanding a range. Per reference (i), some military training activities have existing NEPA coverage ([https://www.29palms.marines.mil/Portals/56/Docs/Environmental-Affairs/SignedMitigated\\_FONSIandFinalSEA\\_OngoingTraining.pdf](https://www.29palms.marines.mil/Portals/56/Docs/Environmental-Affairs/SignedMitigated_FONSIandFinalSEA_OngoingTraining.pdf)).

### 3. Procedures.

a. Submit Request for Environmental Impact Review. The entity conducting or approving the action (herein referred to as the "action proponent/ sponsor") shall submit a Request for Environmental Impact Review (REIR) to Environmental Affairs for review and approval before implementing any proposed action.

(1) Complete the REIR form: [https://usmc.sharepoint-mil.us/:w:/r/sites/TECOM\\_MAGTFTC\\_G4\\_NREA/NEPA/REIR\\_MAGTFTC.docx](https://usmc.sharepoint-mil.us/:w:/r/sites/TECOM_MAGTFTC_G4_NREA/NEPA/REIR_MAGTFTC.docx). REIRs must adequately describe the action in layman's terms, be concise, and contain information pertinent to the environmental review, such as location and approximate dimensions of any potential ground disturbance.

(2) Submit REIR along with a site map and any other pertinent documents (i.e., design drawings, scope of work, conceptual images) electronically using NEPA Process Automation & Management Support Module System (NEPA-PAMS):

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<https://nepapams.usmc.mil/>. Contact the NEPA Program Manager to gain access to NEPA-PAMS.

(3) REIRs should be submitted at the earliest time possible to ensure compliance with NEPA and other environmental requirements and to minimize project delay due to lengthier environmental review requirements. Once a scope of work has been developed, the environmental review process can start. The duration of the environmental review process depends on how complex the proposed action is and the level of analysis required (see Table 1). The majority of proposed actions at the installation fall under a Categorical Exclusion.

**Table 1. NEPA Analysis and Timeline**

<b>Environmental Impacts</b>	<b>Type of Analysis Required</b>	<b>Estimated Duration of Analysis</b>
Insignificant	Categorical Exclusion	1 Month (no ground disturbance) 3 Months (ground disturbance)
Unknown	Environmental Assessment	1 Year
Significant	Environmental Impact Statement	1-2 Years

b. Environmental Review. Once the action proponent/ sponsor has submitted the REIR in NEPA-PAMS, the NEPA Program Manager: conducts a completeness review of the REIR in accordance with the above-listed procedures; makes an initial NEPA determination regarding the level of analysis required; and routes the REIR for subject matter expert (SME) review.

(1) For categorically excluded projects that only require a low level of analysis, the analysis is conducted in-house and the final NEPA determination and environmental requirements are included in a signed Decision Memorandum.

(2) For projects that trigger a higher level of analysis (i.e., Environmental Assessment or Environmental Impact Statement), the final NEPA determination would be communicated to the project proponent or action sponsor. The action proponent/ sponsor is responsible for funding NEPA documentation and all related ancillary studies, mitigation, and monitoring costs. The action proponent/ sponsor would continue to coordinate with the Environmental Affairs office and NEPA Program Manager while completing the higher-level review process.

c. Issuing the NEPA Document. For categorically excluded projects, a Decision Memorandum will be generated to document the scope of the proposed action, the outcome of the environmental analysis, and any environmental requirements that apply to the action.

(1) The action proponent/ sponsor must acknowledge the contents of the Decision Memorandum and agree to any required mitigation or conditions that must be met before, during, and after completing the proposed action by signing the Decision Memorandum in NEPA-PAMS.

(2) Once acknowledged, the NEPA document must be provided to the relevant personnel overseeing and implementing the proposed action (i.e., contracting officers, contractors, in-house personnel, etc.). If utilizing a contract mechanism, the NEPA document must be incorporated into the contract prior to entering the solicitation phase.

d. Post Environmental Review. After the environmental review process has been completed and a NEPA document has been issued, action proponent/ sponsors are responsible for ensuring NEPA compliance for ongoing actions (continuing duty) and projects (until completed).

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(1) Ensure compliance with environmental requirements that are stipulated in the NEPA document.

(2) If an action has not been implemented within 1 year of issuing the NEPA document, it must be revalidated prior to implementing the action. This ensures that the environmental requirements are current prior to implementing the action and prevents unanticipated contract modifications.

(3) Amend the REIR if the scope of the action changes (e.g., new location or additional work). A new NEPA document that covers the entire scope of work must be issued prior to implementing the action.

4. Limitations on Actions. Proposed actions shall not be implemented prior to completing the environmental review process. This includes issuing contracts for project implementation or awarding funds that commit the agency to a certain course of action. For more information, see 40 CFR §1506.1(a) to (c).

5. Documentation and Record Keeping

a. Per Marine Corps Order 5090.2, Volume 12, the project proponent and/or action sponsor will maintain copies of all NEPA documentation for at least 10 years. The clock starts once the NEPA environmental review process is finalized, or the project is completed, whichever occurs later.

b. NEPA-PAMS is used as the main document repository for all proposed actions and associated documentation, but the project proponent and/or action sponsor shall keep local copies of important documents.

c. For Environmental Assessments and Environmental Impact Statements, the action sponsor is responsible for implementing and tracking all mitigation and monitoring commitments that were made in the NEPA decision document (e.g., Finding of No Significant Impact or Record of Decision). The action sponsor shall provide annual mitigation and monitoring reports to the NEPA Program Manager for Headquarters' annual reporting.

6. Emergency Actions. Please report emergencies as soon as possible to determine if it warrants an extension or exemption. Emergency response actions may still require compliance with NEPA (see references (b) and (c)) and other applicable environmental laws. Notify the Environmental Affairs NEPA Program Manager at (760) 830-8191, Deputy Director at (760) 830-7688, or the Director at (760) 830-5675.

7. Inspection and Corrective Action

a. Action proponents/ sponsors are responsible for ensuring NEPA compliance for their proposed actions and shall self-report any instances of non-compliance.

b. NEPA violations may lead to violation of other applicable environmental laws, which trigger civil and criminal penalties. Action proponents/ sponsors that fail to ensure NEPA compliance will be subject to internal investigations or external reporting and will be held liable for any penalties.

c. Environmental Affairs compliance staff may recommend corrective actions for observed instances of NEPA non-compliance, but the responsibility for ensuring NEPA compliance lies with the action proponent/ sponsor.

## **Frequently Asked Questions**

### **NEPA Environmental Review Process**

#### **Do I need to submit a REIR for Self-Help projects?**

No. The recurring action Decision Memorandum for routine repair and maintenance conducted by Public Works includes the Self-Help Program. However, Self-Help is limited to tasks that require minimal craft skills and simple hand tools (e.g., replacement of shower curtain rods, light bulbs, ceiling tiles, miscellaneous hardware, and touch-up painting). Self-Help does not include intrusive activities such as carpet removal or drywall replacement. For more information on the Self-Help Program, please contact Public Works.

#### **Do I need to submit a REIR to install a pull-up bar or shade structures outside my building?**

Yes.

#### **Do I need to submit a REIR for x, y, or z?**

Most actions trigger the environmental review process. To be sure, please contact the NEPA Program manager to confirm and provide guidance.

#### **How do I fill out the REIR?**

Please contact the NEPA Program manager with specific questions or to request a one-on-one training session.

#### **Does the Decision Memorandum expire?**

Unless the Decision Memorandum specifically states that it will no longer be valid at a certain time, there is no expiration date. However, if the Decision Memorandum issuance date exceeds 1 year at the time of implementation, the action proponent/ sponsor must revalidate the Decision Memorandum to ensure that requirements have not changed.

#### **How do I revalidate a NEPA document?**

Please contact the NEPA Program manager to initiate the revalidation process.

#### **Can the recurring action Decision Memorandums be utilized by contractors?**

The two recurring action Decision Memorandums are intended to cover routine repair and maintenance of paved areas and existing facilities conducted by Public Works in-house staff or tenants via the Public Works Self-Help program. They can be utilized for contracted work, but this must be approved by Environmental Affairs, and is done so on a case-by-case basis. Use the following procedure to submit a request to use one of the recurring action Decision Memorandum for contracted out work:

#### **INSTRUCTIONS:**

**Step 1)** In NEPA-PAMS, select the recurring action Decision Memorandum you would like to use.

**Step 2)** Go to the “All Documents” tab and select “Register a Document”. Upload a single file that contains the scope of work for the entire project and any ancillary work. The file should include the project details, map, conceptual photos, and drawings if available. Be sure to fill in the Document Title and Author in NEPA-PAMS before selecting “Upload Document”.

**Step 3)** Go back to the “All Documents” tab and select “Doc Info” next to your uploaded document. Select “Document emails”, then “New Email”. In the body of the email, include a statement requesting to utilize the recurring action Decision Memorandum for your project and an explanation as to why you think the projects fits within the scope of the Decision Memorandum. Before sending, select “EA – NEPA Program Manager” under the “To Organizations” column.

**Step 4)** Within 1-2 weeks, Environmental Affairs will review the request and inform you via email if your request is approved or if a project specific REIR is required.