

## INFORMATION PAPER

SUBJECT: Lead Time for Review of Record of Environmental Consideration (REC)

1. PURPOSE: To provide information to Military Components of the required lead-time for the environmental review process for assessment of the effects of training on the environment.

2. INFORMATION:

a. 32 CFR 651 (a.k.a.) AR 200-2, Environmental Analysis of Army Actions, requires all proposed actions to be reviewed. A Record of Environmental Consideration is used when the proposed action is exempt from the more rigorous requirements of the National Environmental Policy Act (NEPA), or has been adequately assessed in existing documents and determined not to be environmentally significant.

b. The REC describes the proposed action and anticipated timeframe, identifies the proponent, and explains why further environmental analysis and documentation is not required. It is a signed statement to be submitted with project documentation.

3. PROCEDURES:

a. IAW Fort Drum's Environmental Guidelines, the Proponent shall submit the REC a minimum of **14 BUSINESS DAYS** prior to preparing/occupying the field for training.

b. The environmental review may necessitate having the PW Environmental Division personnel conduct site visits, natural/cultural resource surveys, inspect setup and operations, and may result in the requirement for the Proponent to provide additional information.

c. The above referenced regulation does not allow enough time to adequately assess many proposed actions, especially larger brigade and division level training (i.e., AWE, Warrior Peak, Mountain Peak, Global Yankee, etc.). This level of training and ERDRE missions shall require the submission of RECs be filed a **minimum of 30 days** prior to training as part of the planning process, and prior to field preparation or occupation.

d. Unit level RECs shall be filed with the PW Environmental Division (T-4848) a minimum of three weeks (14 business days) prior to field preparation or occupation. Although RECs may be submitted by FAX to begin the review process, the original REC is required for approval and annotations.

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e. RECs, once approved, are **to be retained with the unit in the field.** The REC form (Fort Drum Form 541, 1 Nov 96) is available from the PW Environmental Division, ext. 2-5110/6899, and the *PW NEPA* Public Folder.

2. CONCLUSION: Decisive planning and coordination are essential for the military mission to be successful. NEPA is an integral part of this planning and environmental review process. The cooperation of all elements utilizing Fort Drum Training Areas will be greatly appreciated. A minimum lead-time of three weeks will enhance our abilities to adequately assess the potential for adverse environmental impact, ultimately improving our overall mission accomplishments while also ensuring environmental compliance. Any additional review time would be greatly appreciated.