

**ALIGNING THE COMPLEMENTARY PROCESSES OF ENVIRONMENTAL MANAGEMENT SYSTEMS AND THE  
NATIONAL ENVIRONMENTAL POLICY ACT**

**U.S. Navy Comments**

**31 August 2006**

<b>Comment No.</b>	<b>Page No.</b>	<b>Para. No.</b>	<b>Commentor/Organization</b>	<b>Comment and Rationale</b>
1	--	General	Navy	At the high level of discussion given in the proposed guide, without a complete knowledge of both EMS and NEPA, it is difficult to understand how the guide aligns the two different processes. There are a number of generalities stated in the proposed guide with respect to how EMS can benefit NEPA, but it is not clear how the actual benefit can be achieved, nor is it clear how/what must be done through EMS to achieve the benefit in NEPA.
2	--	General	Navy	The guide appears to make the assumption that the reader is familiar with both NEPA and EMS. In most organization, including NAVSEA these two disciplines are managed separately. As written, the guide does not provide an understandable explanation of the EMS approach or how it can be incorporated into the NEPA process and vice versa. Request CEQ clarify the guide with respect to how the integration of the NEPA and EMS processes will occur and provide the steps that must be taken to effectively produce the end result the CEQ is requesting.
3	2	1	Navy	EMS acronym already defined previously.
4	3	Last par	Navy	Replace “Projects” (when referring to NEPA) with “Proposed Action”. Ensure this change is carried throughout document—including the Table.
5	4	2	Navy	Correct to read: “... EMS can include “major” elements of the NEPA process...”rather than “all” elements.
6	6	2	Navy	Correct to be “...then the NEPA process is one of many requirements and procedures that can be managed as part of the EMS.”
7	6	3	Navy	Correct to read: “This paper concludes with the table provided below, which highlights the complementary process/elements of EMS and NEPA.
8	7	Table	Navy	Suggest moving NEPA column to column 2 and EMS and NEPA Complementary Examples column into column 3.
9	7	2, col 2	Navy	Correct to read, “Under NEPA, an agency evaluates a new/ongoing proposed action at the planning stage...”
10	9	1, col 2	Navy	Correct to read, “Identifying the resources and responsibilities for EMS...”
11	9	1, col 3	Navy	Correct to read, “...EA/FONSI and EIS/ROD...”
12	10	2, col 2	Navy	Should state that EMS documentation would include agency NEPA documents and information.
13	13	2, col 3	Navy	What is the decision document following an EA FONSI based on mitigation measures? The FONSI is the decision document for an EA.
14	14	1, col 3	Navy	Should mention compliance with NEPA and with applicable substantive laws (e.g. CAA, CWA, ESA, MMPA, NHPA, etc).
15	15	2, col 3	Navy	Need to include NEPA related information on Internal Audits. QC and QA within each Agency as specified by Agencies regulations. Means to ensure mitigations and commitments are applied and successful.
16	15	3, col 1	Navy	Correct to read “Reviews/assesses the need for....”

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17	15	3, col 2	Navy	Move this information into column 3 and move first paragraph of column 3 into column 2.
18	15	--	Navy	"Control of records" could include procedures for collecting, managing and retaining Administrative Records for NEPA documents.