



DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
JOINT FORCE HEADQUARTERS  
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CAJS-J4-CAEV

22 November 2006

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Initiating Environmental Review Using the Project Information Packet (PIP)

1. **Purpose:** This memorandum describes the procedure for initiating environmental review of California Army National Guard (CA ARNG) activities using the Project Information Packet (PIP).
2. **Background:** All proposed actions ('projects') must be reviewed for environmental effects in accordance with the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) prior to implementation. In the CA ARNG this is accomplished through the completion and submittal of a PIP to the Environmental Directorate (CAEV).
3. **Project Information Package (PIP):** The PIP is completed by the Project Proponent (i.e., the Action Officer, Project Manager or other person designated by a Directorate or Unit) and submitted to CAEV for review.
4. **When a PIP is Required:** A PIP must be submitted for the following activities conducted by the CA ARNG:

- Any ground disturbing activity including grading, excavating, trenching, filling, placement of soils, scraping, auguring, well drilling, intrusive testing (e.g., 'potholing') or any other disturbing activities associated with construction, maintenance, military training\*, vegetation removal/clearing, and environmental studies.
- New construction or additions to buildings, structures or other facilities.
- Demolition of buildings, structures or other facilities.
- Sampling, surveying, analytical testing, site preparation and other intrusive testing to determine the presence of hazards, contamination, pollutants, or special hazards (e.g. lead-based paint, asbestos, UXO).
- Any activity that involves removal, handling and/or disposal of asbestos-containing material and/or lead-based paint.
- Maintenance of historic structures (Historic structures listed at Enclosure 1).
- Major tree pruning (as defined by applicable CA ARNG Tree Policy) or vegetation removal (except routine landscaping).
- Real estate actions (acquisition, disposal, leases, licenses, permitting, master planning).
- Military training activities, except those entirely of a classroom or administrative nature\*.
- New aircraft operations or changes to existing air operations or aircraft.
- Force structure, stationing and equipment (MTOE) changes.
- Troop training/troop labor projects (e.g., Innovative Readiness Training).
- Policy adoption or policy changes that will have a physical effect on the environment.

\*NOTE: For military training activities at Camp Roberts and CSLO the Form 307 may be used in lieu of a PIP.

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5. When a PIP is Not Required: A PIP is not required for the following activities. These actions may proceed without formal environmental review. NOTE: per above the activities listed below cannot involve ground disturbance or historic structures).

- ❑ Administrative activities including: law enforcement/force protection actions; preparation of regulations, procedures and other guidance documents; normal personnel and fiscal activities; non-construction activities involving community participation; and ceremonies, funerals and concerts.
- ❑ Routine repair and maintenance of buildings, airfields, grounds, equipment, and other facilities. Examples include, but are not limited to: repair or replacement of roofs, doors, windows, flooring, or fixtures; application and removal of finishes; landscape maintenance not involving major tree pruning (Note: REC required for removal and disposal of asbestos-containing material and lead-based paint or work on historic structures).
- ❑ Maintenance and repair of archaeological, historical, and endangered/threatened species avoidance markers, fencing, signs and other existing facilities provided that those actions do not involve ground or vegetation disturbance.
- ❑ Vehicle and equipment maintenance and repair.
- ❑ Immediate responses in accordance with emergency response plans.
- ❑ Routine storage, handling, transportation and disposal of solid waste, medical waste, and special hazards (e.g., asbestos, lead-based paint, PCBs, UXO). This does not apply to construction, maintenance or demolition activities that involve these materials.
- ❑ Training entirely of an administrative or classroom nature
- ❑ Flying activities in compliance with FAA requirements, installation or repair of airfield equipment, and participation in air shows on non-Army property.

6. Process: The environmental review process is initiated by submittal of a complete PIP to CAEV.

- ❑ Step 1: Proponent submits a PIP to appropriate CAEV office. PIPs for Camp Roberts should be submitted to CAEV-CR; PIPs for Camp San Luis Obispo should be submitted to CAEV-CS. All others should be submitted to the CAEV at the JFHQ.
- ❑ Step 2: CAEV reviews for completeness. If complete, analysis will begin.
- ❑ Step 3: If additional information is required, a Request for Information (RFI) will be sent to the proponent via email. Until all requested information is received, the project will be placed on hold. RFI's will be sent to Proponents within 10 working days of receipt of a PIP.
- ❑ Step 4: An Environmental Checklist and a Record of Environmental Consideration (REC) will be completed within 15 working days of a complete PIP, which will signed by the CAEV Director.
- ❑ Step 5: These signed documents and CAEV conditions to avoid environmental effects (if required) will be provided to the Proponent for signature. Once signed by the Proponent, the REC is complete.

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- Step 6: If the proposed action is determined to need an Environmental Assessment (EA), this determination will be provided to the Proponent via email within 10 working days of receipt of a PIP.

7. Other Permitting: In addition to complying with NEPA, many actions require permits from regulatory agencies such as the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration (NOAA) Fisheries, Department of Fish and Game, Air Quality Management Districts, Water Quality Control Boards, Integrated Waste Management Board, Department of Toxic Substances Control, etc. CAEV will identify these permitting requirements to the Project Proponent during the initial review of the action. Any fees will be the responsibility of the Project Proponent.

8. Early Coordination: To ensure NEPA compliance Project Proponents must coordinate with CAEV as early as possible. This is critical to ensuring timely completion of CA ARNG actions and execution of federal funds. Compliance with NEPA is legally mandated; proceeding with an action without environmental review is illegal.

9. Further Information: The POC for this project is Mr. Douglas Bryceson at (916) 854-3456. Please contact him if you have any questions.



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Director, Environmental Programs

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Facilities and Engineering, (CAFE)  
Training and Operations (CAOT)  
Commander, Camp Roberts  
Commander, Camp San Luis Obispo  
Commander, Joint Force Training Base, Los Alamitos

## **Enclosure 1—CAARNG Historic Structures**

The following structures are eligible for listing in the National Register of Historic Places (NRHP) and cannot be modified without environmental review:

- Nacimiento Ranch House Camp Roberts: 5 miles west of the main gate along the southeast bank of the Nacimiento River
- Lodi Armory, west side of Washington, north of East Lockford Street
- Long Beach Armory, 854 East 7<sup>th</sup> Street
- Pomona Armory, near the intersection of 6<sup>th</sup> Street & Park Avenue
- Salinas Armory, northwest corner of Howard and Lincoln streets
- San Jose Armory, 240 North 2<sup>nd</sup> Street
- Santa Barbara Armory, 700 East Canon Perdido Street
- Yuba City Armory, 310 B Street