



**CHIEF OF ENGINEERS
ENVIRONMENTAL ADVISORY BOARD
WASHINGTON, D.C. 20314-1000 (CECW-P)**

10 April 2009

Lieutenant General Robert L. Van Antwerp
Chief of Engineers
441 G Street NW
Washington, DC 20314-1000

Dear General Van Antwerp,

The Environmental Advisory Board (EAB) has reviewed the Corps' Environmental Operating Principles (EOPs) to understand their purpose, goals and the degree of implementation at the field level and within different organizational elements (civil works planning, operations, engineering, etc.). The EAB conducted two meetings to discuss the understanding and implementation of EOP's with Corps district staff, mid and senior district and division leadership, and non-governmental organizations, as well as to see on-the-ground ecosystem restoration activities by participating in local field trips. The EAB met with the Seattle District from April 28-30, 2008 and the San Francisco District from January 13-15, 2009.

Background

In March 2002, then Chief of Engineers LTG Robert Flowers introduced the seven Environmental Operating Principles during a visit to south Louisiana where he attended two dedication ceremonies for ecosystem restoration projects. The EOPs were designed to provide the Corps with direction on how to better achieve its stewardship of air, water and land resources, while demonstrating the connection between the management of water resources and protection of environmental health. The Chief's unveiling of the EOPs made evident the direction the Corps would be taking henceforth to achieve greater synergy between environmental sustainability and execution of the Corps' program.

Subsequently, in 2003 the Corps issued implementation guidance for the EOPs [Engineer Regulation (ER) 200-1-5] that described the principles as a way to illuminate the ways in which the Corps' missions must be integrated with natural resource laws, values, and sound environmental practices. The ER stated that the EOPs and associated doctrine would, to the extent legally and financially practical, guide all appropriate Corps management initiatives and business processes, and that the policy would encompass the full spectrum of Corps activities, including planning, design and construction, operations and maintenance, regulatory, research and development, acquisition, real estate and support for others.

Discussion

The EAB appreciates the challenge of assuring everyone across the Corps adjusts their awareness of the importance of integration of environmental considerations in making daily project decisions. Nevertheless, based upon EAB review of EOP implementation the Board recommends that the Corps needs to enhance and strengthen its' resolve to blend economic and environmental solutions to water resource problems. Of critical importance, there is not an apparent leader at Headquarters who is responsible for creating an environmental vision and facilitating its implementation. We recognize that these two districts are considered proactive and progressive in integrating environmental values into their programs. We see a need to expand this level of environmental commitment throughout the Corps.

The EAB found the Seattle District in particular to be proactive in implementation of the EOPs. This may be due in part to action-forcing factors in the region such as impacts to endangered species and crisis in operations of Corps projects, as well as a local culture that was and continues to be conducive to extensive coordination and forming of partnerships to help resolve environmental concerns related to Corps actions. The district believes that the EOPs have become an integral part of project development. In addition to national policy, the district utilizes the Northwestern Division EOP Policy Guidance Framework (2004) and their own District policy on Sustainability in Agency Projects and Business Practices (2006). Seattle District has a (part-time) designated person to lead EOP and sustainability implementation efforts and EOPs and sustainability are addressed in performance objectives.

The San Francisco District similarly engages in effective coordination efforts and external partnerships to deal with environmental issues. The district has many ecosystem restoration projects being implemented through partnerships. Although district personnel mostly felt that the EOPs were incorporated into their work (sometimes due to other regulatory requirements such as the Endangered Species Act or Clean Water Act), the EAB did not see the same level of commitment to ensuring and documenting implementation of the EOPs, or a consistent level of understanding among different programs.

It is evident to the EAB that for the EOPs to be fully integrated into all Corps activities, training of all personnel is very important. This includes staff at the district level up to senior leadership at all levels of the organization. Additionally, having a designated person responsible for overseeing a district's implementation of the EOPs, as well as setting policies and goals, and tracking compliance, is crucial to giving them higher visibility and importance. It is clear, however, these tasks, as well as training, provide a lot of work for one person, and too much for a staff person who has other primary duties.

The EAB also believes that lack of emphasis on the EOPs from Headquarters can lead to a lack of consistent understanding in the districts, and the belief that the EOPs are not adequately considered during the project life-cycle.

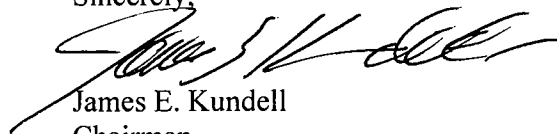
Recommendations

1. National and Local Leaders. The EAB believes that strong environmental leadership is needed at an executive level at Headquarters to place greater emphasis on the ecosystem restoration program and implementation of an environmental vision throughout the Corps. Additionally, districts should have a designated staff person to oversee EOP implementation.
2. Training. Educating staff as well as leadership, particularly new commanders, on ecosystem restoration and the purpose of the EOPs and implementation of the associated national policy for all business lines, is critical.
3. Measuring Success. Measurable long term goals and indicators of success should be developed for the EOPs.
4. Principles and Guidelines (P&G). The EAB recommends consideration of EOPs into ongoing revisions to the P&G.

The EAB believes that full and proper implementation of the Environmental Operating Principles into all Corps activities will result in projects that not only lessen conflicts between economic development and environmental protection, but also promote more holistic, sustainable water resource development projects and result in sound investments for citizens of this Country.

Thank you for considering our recommendations. We look forward to your reply and to productive discussions at our next meeting.

Sincerely,



James E. Kundell
Chairman

Chief of Engineers Environmental Advisory Board

Attachment 1.

**U.S. Army Corps of Engineers
Environmental Operating Principles**

1. Strive to achieve Environmental Sustainability. An environment maintained in a healthy, diverse and sustainable condition is necessary to support life.
2. Recognize the interdependence of life and the physical environment. Proactively consider environmental consequences of Corps programs and act accordingly in all appropriate circumstances.
3. Seek balance and synergy among human development activities and natural systems by designing economic and environmental solutions that support and reinforce one another.
4. Continue to accept corporate responsibility and accountability under the law for activities and decisions under our control that impact human health and welfare and the continued viability of natural systems.
5. Seek ways and means to assess and mitigate cumulative impacts to the environment; bring systems approaches to the full cycle of our processes and work.
6. Build and share an integrated scientific, economic and social knowledge base that supports a greater understanding of the environment and impacts of our work.
7. Respect the views of individuals and groups interested in Corps activities; listen to them actively and learn from their perspective in the search to find innovative win-win solutions to the Nation's problems that also protect and enhance the environment.