BLM EMS

BLM Environmental Management System and Core Aspect Guidance

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Executive Summary

Environmental Management Systems (EMSs) emerged in private sector industry in the 1990's to aid corporations in reducing their overall impact on the environment. The requirement for Federal agencies to develop and implement EMSs at appropriate organizational levels soon followed with the issuance of Executive Order (EO) 13423 – *Strengthening Federal Environmental, Energy, and Transportation Management*. In response to the EO, the Department of the Interior (DOI) issued an EMS policy requiring all Bureaus to implement EMSs. The Bureau of Land Management (BLM) addressed the Department's EMS policy and requirements by launching two pilot EMSs; One at the Washington Office and one at the Wyoming State Office.

The lessons learned during the pilot EMS implementations identified four core significant environmental aspects that are likely to be applicable to all EMSs developed and implemented throughout the Bureau. The core aspects address the fundamental activities that are part of the BLM's mission, in addition to the mandates that have been placed upon the BLM by E.O. 13423 and the OMB's Environmental Stewardship and Energy Management Scorecards. Because these ideas are central to the BLM, due to the BLM's overall mission and outside requirements, they are considered to be at the core of the BLM's environmental impacts.

The four core aspects have been identified for BLM Environmental Management Systems are:

- Energy management
- Green procurement
- Monitoring the condition of the public land
- Reclamation of public land

The energy management aspect is geared toward the overall reduction in energy use and an increase in the use of renewable energy wherever possible. Green procurement addresses the purchase of environmentally preferable products and services that meet the requirements of a variety of presidential and regulatory mandates, conserve natural resources, and create a market for products made with recycled materials or that are bio-based, energy efficient, or water-efficient. Monitoring the condition of public land is essential to fulfilling the overall BLM mission and can be used to address almost any activity that the BLM conducts on public lands. The monitoring aspect addresses the diligence necessary to ensure that the BLM has an understanding of the environmental impacts of public use of the public lands, whether it is for grazing, recreation, or other uses, the environment must be monitored for changes. While working to achieve the goal of management and conservation of public lands, the BLM is also tasked with reclaiming land when it is in less than pristine condition. The reclamation of public lands aspect addresses actions needed to restore the health of the public lands.

The core aspects are designed to be a tool for organizations working toward the development and implementation of an EMS. The use of the core aspects will reduce the initial burden placed upon an organization while developing and implementing their EMS. A majority of the development work is done for the core aspects, as suggested objectives and targets are provided. Each of the four core aspects offers a wide range of interpretations for individual State Offices or National Centers and may be tailored to meet an organization's unique needs. Due to the varying nature of activities in different organizations, not all of the core aspects may be applicable and therefore, the use of the core aspects is not mandatory. How each organization decides to address the aspects is at its discretion. If an organization elects to use one or more of the core aspects, the majority of the work in identifying

appropriate objectives and targets has been completed and this guidance document can be used as a template. This is intended to serve as a useful starting point and allow users to gain important insights and guidance based on best practices identified during previous implementations of EMS.

BLM Environmental Management System and Core Aspect Guidance

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1. What is EMS and how is the BLM proceeding with its development and implementation?

Environmental Management Systems (EMS) emerged in the early 1990s to provide organizations with a proactive and systematic approach for managing the environmental consequences of their operations. Such systems have been widely adopted by industry and Government and have been effective at improving organizational efficiency and environmental performance support.

An EMS encourages organizations to continuously improve their environmental performance. The system follows a cyclical plan, do, check, act cycle (see Figure one). The process works as follows: organizations first commit to an environmental policy, then form a Cross Functional Team (CFT) that will work with the BLM's EMS assistance contractor to develop an EMS Implementation Plan. The Washington Office Division of Environmental Quality and Protection (WO 280) will provide funds for this contractor support. The purpose of the plan is to identify the impact that each core aspect has on the environment[1]. The CFT then rates each aspect using criteria it selected and prioritizes them. The aspects deemed significant by the CFT are then selected to be addressed through the EMS.

Objectives and targets are established for improving the environmental performance for each aspect that is considered significant and for reducing the environmental impact of that aspect. The CFT then presents these aspects, and their associated objectives and targets to improve environmental performance, to the management team for its review and approval. After management team approval, an EMS Implementation Plan is prepared. The CFT then moves on to the next step, implementation, where the organization attempts to address what it has identified as significant environmental aspects. After that, the organization evaluates its environmental performance to see whether the objectives and targets are being met. The results of this evaluation are summarized in the annual EMS Accomplishments Report which is presented to management for their evaluation as to whether the EMS has accomplished what was laid out in its plan. If targets are not being met, the organization's management determines what corrective action is taken.

The EMS cycle is continuously repeating. The CFT will revisit the prioritization of the organization's environmental aspects annually in order to identify new significant aspects and/or keep some or all of the previous year's aspects, and establish new objectives and targets. As outlined above, the process begins once again with management team approval of the significant aspects and their associated objectives and targets, with a new CFT implementing the new plan to address the aspects that have been deemed significant for this round. At the end of every fiscal year, the CFT prepares the annual EMS Accomplishments Report. The EMS cycle is flexible, allowing the organization to modify what they deem significant to reflect the organization's activities each year. This plan, do, check, act cycle has been adopted and standardized by the International Standards Organization (ISO) in ISO 14001. The ISO 14001 standard provides a framework for implementing EMS at all organizations that allows the necessary flexibility to ensure the EMS is relevant to the organization. Figure one shows the EMS cycle and summarized the important actions taken in each phase.

The implementing instructions for E.O. 13423 prepared by the Office of Management and Budget at the Environmental Protection Agency (EPA) requires that each organization must have an initial third party

[1] An environmental aspect is the portion of an organization's activity that directly interacts with the environment. An environmental impact is the result of an aspect's interaction with the environment.

audit of its EMS, that management must respond to the audit's findings, and that the independent third party audit and management response to it must be repeated periodically. Only after the audit's findings are responded to by management may an organization issue a Declaration of Conformance with the EMS requirements in E.O. 13423.

E.O. 13423 requires that organizations must develop EMSs that conform to the general principles of ISO 14001. After management has responded to the third party audit's findings as required by the E.O., it may then issue a Declaration of Conformance.

The initial third party audit for the Washington Office, State Offices, or National Centers will be performed after each organization issues its first annual EMS Accomplishments Report. Subsequent audits will be performed by the Compliance Assessment Safety Health Environment (CASHE) contractor during periodic audits. The Washington Office Division of Environmental Quality and Protection (WO 280) will provide funding for and the National Operations Center will award the contract for performance of the initial third party audits.

The suggested process for development of an EMS is summarized in Appendix A of this document. An estimate of the time commitment for EMS development and implementation is also provided in Appendix A.

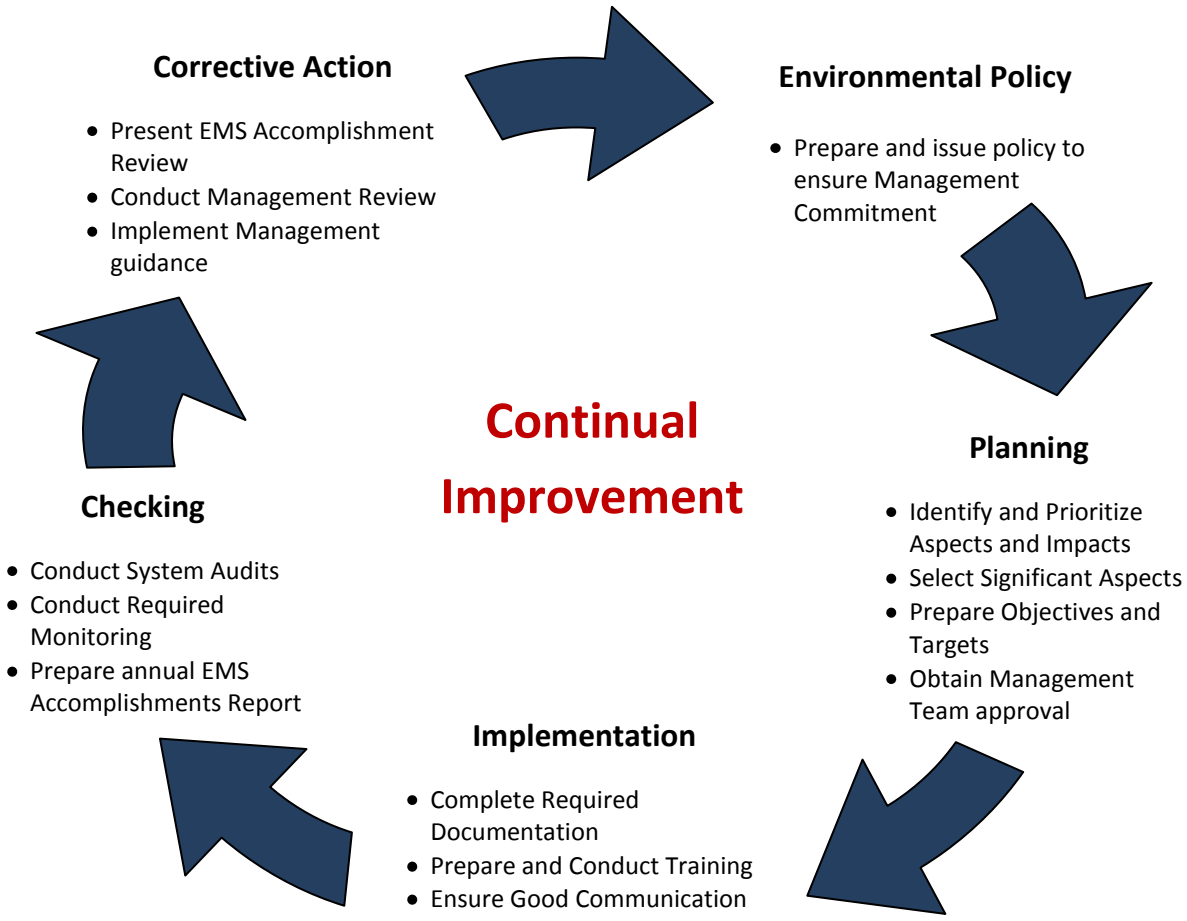

Figure 1. EMS Cycle

2. Why do we have to develop and implement an EMS?

The use of EMSs in the Federal government began in April 2000 with the issuance of Executive Order (E.O.) 13148, *Greening the Government through Leadership in Environmental Management,* which required all appropriate Federal facilities to implement an EMS by December 31, 2005.

Although many Federal agencies were unable to comply with the requirement deadline, primarily due to limited resources, the move toward EMS implementation progressed. The Office of Management and Budget (OMB) worked with the Office of the Federal Environmental Executive (OFEE) and the Environmental Protection Agency (EPA) to encourage Federal facilities to move forward with EMS implementation at appropriate organizational units by developing and utilizing an Environmental Stewardship scorecard to rate Federal agencies on their EMS development, implementation, and performance. The DOI's implementation of EMS, along with other environmental initiatives identified in the Environmental Stewardship scorecard is evaluated in January and July every year by the OMB. The DOI'sOffice of Environmental Policy and Compliance (OEPC) requests information from the BLM quarterly to prepare its response to the OMB. The OEPC rates each bureau's performance against the OMB Environmental Stewardship scorecard's elements. These ratings are periodically presented at the Department's monthly Management Initiative Team meetings that are held with Assistant Directors from all of the Bureaus.

In May 2006, the Director of the BLM issued Instruction Memorandum (IM) Number 2006-148, which established the BLM's EMS Policy (Appendix A). In support of that policy, the BLM's Washington Office Director issued IM Number 2006-170. This IM called for the Washington Office to provide resources for a contract to aid in developing and implementing pilot EMSs at the BLM's Washington Office (WO) and the Wyoming State Office. These pilots served as an EMS evaluation tool and as a template for other appropriate organizational units within the BLM in the development of future EMSs. It was through development of these two pilot EMSs that the similarity in significant aspects of different organizations was observed. This observation led to the development of the BLM core aspects.

In January 2007, the mandate for the establishment of EMS at all Federal facilities was reemphasized. Executive Order (E.O.) 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* was signed by President Bush. The new E.O. once again called for all Federal facilities to develop and implement an EMS, stating:

> …the head of each agency shall: (b) implement, within the agency, environmental management systems (EMS) at all appropriate organizational levels to ensure (i) use of EMS as the primary management approach for addressing the environmental aspects of internal agency operations and activities, including environmental aspects of energy and transportation functions, (ii) establishment of agency objectives and targets to ensure implementation of this order, and (iii) collection, analysis, and reporting of information to measure performance in the implementation of this order…

In addition, this new Executive Order consolidates a host of previous E.O.s related to the environment, energy, and transportation, including E.O. 13148. The new E.O. established targets for the environment, energy, and transportation management. These new mandates are easily incorporated and addressed through the BLM core aspects. These core aspects, if adopted by, will expedite the learning curve associated with the implementation of any new management system by building on the experience gained from the pilot EMSs done in the WO and Wyoming.

3. Aren't we already doing this?

The comparison between EMS and the National Environmental Policy Act (NEPA) activities currently being conducted by the BLM is common. It is a common misconception that NEPA and EMS are the same (see Figure 2). While both activities strive to lessen an organization's impact on the environment, only EMS:

- Focuses on continual improvement
- Checks on the actual environmental impact versus the anticipated impact
- Looks at all activities that have an effect on the environment
- Extends past the initial examination of activities, products, or services that the organization performs

As you know, NEPA examines the environmental impact of proposed activities, as well as alternatives to the proposed activity. In addition, NEPA documentation also addresses mitigation measures that must be taken during the course of the project. Once a determination is made as to which alternative will cause the least environmental impact and is the most feasible for accomplishing project goals, the NEPA process is complete. The project goes forward towards completion and the mitigation measures are put in place. Unlike EMS, which is plan, do, check, act, the NEPA process stops at plan, do. Under NEPA, the environmental impact is not revisited and follow-up is not typically conducted to assess whether the initial environmental impact assumptions were correct. The mitigation measures put in place are not revisited to assess whether they adequately addressed the environmental concerns.

EMS picks up where NEPA left off. Because EMS is cyclical in nature, the evaluation of environmental impact of an activity does not end with the decision on a course of action. EMS identifies impacts from all operations and programs, while NEPA focuses on a single action. Through an EMS, the activities identified for environmental improvement are annually evaluated. The annual evaluation determines whether the effort made to reduce environmental impact was successful, or if other options should be considered and implemented. Follow-up monitoring and corrective actions are built into the framework of an EMS and are critical elements of the process. A comparison between EMS and NEPA is shown below in Figure 2.

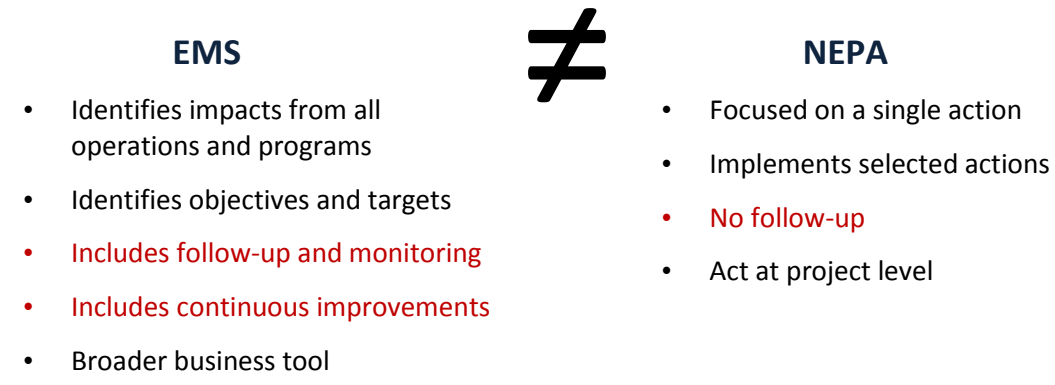

Figure 2. EMS versus NEPA

There is room within EMS to incorporate NEPA actions. NEPA actions certainly have an environmental impact and therefore should be listed as an environmental aspect in the EMS. In fact, the White House

Council on Environmental Quality (CEQ) has a task force that is actively advocating for the inclusion of NEPA activities into EMS.

4. What are aspects, objectives, and targets?

Environmental "aspects" are those elements of organizational activities, products, and services that interact with the environment. Two types of environmental aspects have been identified for the BLM through the two pilot EMS programs. The first are facility specific aspects. Facility aspects are related to buildings, where employees work. The second type of environmental aspect is programmatic aspects. Programmatic aspects relate to the activities conducted by the BLM on the public lands. Programmatic aspects cover the environmental impacts resulting from the management of public lands.

Each type of environmental aspect has an impact on the environment. Environmental impacts are the effect that aspects have on the environment. Impacts can be both positive and negative. An aspect may also have more than one environmental impact. The environmental impacts commonly seen in the BLM include:

- Health and safety exposure
- Degradation of air quality
- Depletion of natural resources
- Degradation of natural resources
- Reduction of suitable landfill space
- Degradation of water quality
- Positive

Below are some examples of typical BLM aspects and impacts.

Facility Aspect: Energy usage
Impact: Depletion of natural resources
Degradation of air quality

Programmatic Aspect: Wild horse and burro grazing
Impact: Depletion of natural resources
Degradation of water quality

Programmatic Aspect: Issuing reclamation project guidance
Impact: Positive

Once environmental aspects and impacts have been identified, they are ranked and prioritized by the CFT. Objectives and targets are developed to address the significant environmental aspects. An objective is an overall goal, arising from the commitments outlined in the Environmental Policy that each organization issued as part of its planning for EMS implementation. A target is a detailed performance requirement that arises from objectives. Targets must have deadlines and measurable goals associated with them (e.g., 10% increase in site investigations by October 2008). Like impacts, there may be multiple targets associated with an individual objective.

Below are examples of typical BLM objectives and targets.

Objective: Decrease the total business miles traveled to minimize dependence on fossil fuels and help improve air quality.
Targets:

- By August 2008, calculate calendar year 2007 baseline data regarding:
  a. numbers of employee travel days
  b. mode of travel
- Train personnel on the availability and use of teleconference, video conference, and internet conference capabilities by November 2008.

Objective: Increase the number of environmental inspections conducted at oil and gas well sites, specifically to ensure that APD conditions of approval are being implemented as required by BLM
Targets:

- Establish a baseline for the number of conditions of approval inspections completed in FY2007 by July 2008.
- Increase the number of conditions of approval inspections completed by Natural Resource Specialists by, 10% in FY 2009.

5. What are Core Aspects?

Through the process of developing and implementing Environmental Management Systems at the two pilot offices, a trend was identified. Four recurring themes rose to the top when environmental aspects were ranked at each facility. Because of their similarity and the prevalence of the aspects in each EMS, the idea of core aspects was developed.

Core aspects are those aspects that have the potential to apply to every BLM facility. The core aspects address the fundamental activities that are a part of the BLM's mission, as well as the mandates that have been placed upon the BLM by E.O. 13423 and the OMB Environmental Stewardship and Energy Management Scorecards. Because these ideas are central to the BLM's overall mission and outside requirements, they are considered to be at the core of the BLM's environmental impacts.

6. Why were these Core Aspects identified?

The initial kickoff of an EMS can be cumbersome. With the implementation of any new management system there is a learning curve that must be overcome. Employees must learn how the system works, what is expected of them, and complete the initial start up work. The core aspects, if adopted, will expedite the learning curve associated with the EMS implementation.

Once the core aspects were recognized through the comparison of the two pilot programs, it was apparent that offering guidance on these four aspects could prove beneficial for organizations just starting out with their EMS implementation and may relieve some of the initial burden.
The core aspects, and this associated guidance document, provide some of the information that each new EMS would otherwise have to generate by itself. Each organization will have to identify all of the environmental aspects and impacts associated with its activities. These four core aspects are likely to be environmental aspects of any organization within BLM. In addition, if any of the four core aspects are deemed significant by the organization, a portion of the next step (i.e., preparation of objectives and

targets) has already been completed for the organization. This guidance document also provides suggested objectives and targets for each of the core aspects that an organization may modify to suit its needs (Appendix B).

7. What are the BLM Core Aspects?

Four core aspects have been identified for BLM Environmental Management Systems:

- Energy Management
- Green Procurement
- Monitoring the Condition of the Public Land
- Reclamation of Public Land

Energy Management – The energy management aspect focuses on overall reduction in energy use and an increase in the use of renewable energy wherever possible. Reduction of energy usage is a category on the OMB's Energy Management scorecard and is an aspect that the BLM is mandated to address. In order for the BLM to achieve the highest level of success on the OMB scorecard, the energy intensity per square foot by all BLM facilities, must be reduced by 20% from the 2003 baseline by 2015. In addition, the scorecard mandates new building designs that must be 30% more energy efficient than required by the current building code standards. The energy management aspect can be mitigated by building energy usage, or reducing consumption of energy through staff travel, as well as purchasing energy efficient equipment, selectively purchasing energy from renewable resources, or any number of ways that fits organizational mission.

Green Procurement – Green procurement addresses the products and services (e.g., janitorial services, printing, and copying services) purchased by a facility in order to fulfill their day-to-day obligations. Green procurement is another category on the OMB Environmental Stewardship scorecard and an aspect that the BLM is mandated to address. The BLM has prepared a Green Purchasing Plan that establishes policy, identifies the types of green products and services the BLM must purchase, and assigns responsibilities for implementation including review of purchases and training of employees. The green procurement aspect can be addressed through the construction and leasing of office space that requires use of products with recycled content or are bio-based and that are energy and water efficient; or training staff on the types of products and services for which green alternatives must be considered.

Monitoring the Condition of Public Land – The BLM's mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. Monitoring the condition of the public land is essential to fulfilling that mission and can be used to address almost any activity that the BLM conducts on public lands. This aspect addresses the monitoring necessary to ensure that the BLM has a grasp on the environmental impacts of public use of public lands, whether it is for grazing, recreation, or other uses, the environment must be monitored for changes to environmental conditions. This aspect can be addressed through monitoring rangeland habitats, evaluating herd grazing numbers, participating in Healthy Landscapes efforts, implementing the Assessment, Inventory, and Monitoring Strategy, or the creation of new environmental initiatives such as those that pertain to climate change.

Reclamation of Public Land – While working to achieve the goal of management and conservation of public lands, the BLM is tasked with reclaiming the land when it is in less than pristine condition. The

reclamation of public lands aspect addresses actions to be taken to restore the health of public lands. The analysis and mitigation for this aspect can be addressed through issuing reclamation guidance, monitoring the performance of cleanup activities (e.g., abandoned mine land, CERCLA cleanups), or incorporating reclamation requirements into permitting regulations pertaining to authorization for use of public lands.

8. Are the Core Aspects for us and do we have to use them?

Under the BLM model for EMS implementation, each State Office, National Center, and the WO will implement an EMS that is specific to their activities. While the activities of each organization differ, there are some that are generally overlapping. The core aspects attempt to address the overlapping activities and to prevent duplication of effort.

The core aspects are designed to be a tool for working toward the development and implementation of an EMS. Due to the varying nature of activities, not all of the core aspects may be applicable. For example, the Energy Management core aspect would probably be applicable to a State that has many older facilities that have not been retrofitted with energy conservation measures, but may not be applicable to a Center that is in a new leased facility built with sustainability in mind. Therefore, the use of the core aspects is not mandatory for the implementation of an EMS. An implementing organization may elect to use none of the core aspects for the implementation of its EMS or may choose to use one or more of the core aspects. The core aspects should be used by an organization to which they apply and that is looking to reduce the initial implementation burden of EMS.

9. How can these Core Aspects be used?

Each of the four core aspects offers a wide range of interpretations for individual State Offices or National Centers. How an organization decides to address each of aspects is at its discretion. If an organization elects to use one or more of the core aspects, a majority of the work in identifying appropriate objectives and targets has been completed. Examples of potential objectives and targets for each core aspect are provided in Appendix B.

In order to take advantage of the core aspects, a State Office or National Center working toward the development and implementation of their EMS should first evaluate all of their activities that have an impact on the environment. If any of the core aspects are listed among their environmental aspects, the organization has a variety of options. The organization may choose to:

- Declare the core aspects that apply to them as their only significant aspects
- Rank their listed aspects and determine if one or more of the core aspects is significant through the ranking exercise
- Declare one or more of the core aspects significant and continue ranking their aspect list in order to determine other significant aspects that their EMS will address
- Determine that the core aspects are not their most significant environmental aspects and address other environmental concerns

If a core aspect is identified as significant by a State Office or National Center, the organization may elect to use the objectives and targets provided in Appendix B. Just as with the core aspects, the State Office

or National Center is at liberty to choose the objectives and targets that are appropriate for their organization.

10. Who is using Core Aspects?

The core aspect concept is being used throughout Federal agencies to aid in the implementation of EMS. The Forest Service, Bureau of Printing and Engraving, and the Defense Reutilization and Marketing Service have all established corporate core aspects for use in the EMSs that have been developed for each of their organizations/facilities. Each of these agencies have rolled out a corporate core EMS to its organizational levels for their individual EMS implementation. These agencies have found that providing their organizations with guidance for implementing their EMS, especially regarding significant aspects common to the entire agency, has eased the burden of EMS development and implementation.

Appendix A
BLM EMS Implementation Approach

EMS Implementation Approach and Estimated Time Commitment

1. Brief State or Center management on EMS and why its implementation is necessary to obtain their support for EMS implementation (CASHE Program Lead will do this upon request).

2. State/Center selects individuals from a variety of programs, one of which should be a Division, Group, or Field manager to form its EMS Cross Functional Team. These individuals participate in the development of an EMS Implementation Plan. Participating programs are determined by the State. The degree of involvement from the field is also up to the State. The programs typically involved include: engineering; procurement; support services; fluid minerals; solid minerals; soil, water and air; hazardous materials management; wild horse and burro; and range. One team member is designated as the State's or Center's EMS Coordinator.

3. Training on what EMS is, its benefits, and how it has been used in the BLM is provided to the Cross Functional Team by the CASHE Program Lead and contractor who will provide on-going support to the team.

4. State/Center issues an Instruction Memorandum (IM) informing all employees that senior management has committed to implementation of an EMS. Example IM will be prepared by CASHE Program Lead and contractor for consideration by the State.

5. Telephone interviews (performed and documented by contractor) are held with each Cross Functional Team member to identify the following:
    a. environmental impacts and aspects for each program (e.g., issues that may be addressed through the EMS);
    b. existing policies and performance measures related to those impacts and aspects that may be incorporated into EMS; and
    c. environmental areas of concern for Cross Functional Team members.

6. Contractor presents environmental impacts and aspects identified during the phone interviews to Cross Functional Team and facilitates the selection of the significant environmental aspects that will be addressed through the first year of EMS implementation.

7. Objectives and targets for each significant aspect are prepared by contractor for review and approval by the Cross Function Team.

8. EMS Coordinator presents significant environmental aspects and associated objectives and targets to State/Center Management Team for their review and approval.

9. State/Center assigns a lead for each objective. Contractor interviews each lead and prepares an Environmental Management Program outlining how the objectives and targets for each significant aspect will be achieved and who is responsible for those actions. Each lead reviews and approves their Environmental Management Program.

10. EMS Implementation Plan, including the Environmental Management Programs, is prepared by contractor for review and approval by the Cross Functional Team.

11. EMS Implementation Plan is presented to the State/Center Management Team by the EMS Coordinator for their approval.

12. State/Center issues an IM informing all employees of the following (draft IM will be prepared by CASHE Program Lead and contractor):
    a. EMS implementation has begun;
    b. environmental aspects that will be addressed during this round of EMS;
    c. training that will be provided; and
    d. their role in the implementation.

13. State/Center rolls out their EMS including training employees on their roles and responsibilities in it.

14. Employees assigned roles in the EMS implement the actions outlined in the Environmental Management Programs.

15. Annual EMS Accomplishments Report is prepared by the EMS Coordinator and presented to State/Center Management Team at the end of the fiscal year, to facilitate reporting on the EMS element in the OMB.

16. State/Center Management Team takes action and makes recommendations concerning the results of the initial EMS implementation.

17. Participate and provide requested information for the required independent third party audit of the State/Center's EMS.

18. EMS Coordinator presents findings from the third party audit to the State/Center Management Team for their review and for direction on corrective actions to be taken to implement findings.

19. EMS Coordinator/CFT implements management direction.

20. State/Center issues its Declaration of Conformance that its EMS has been fully implemented in accordance with Executive Order 13423.

21. Process starts over following the procedures described in the EMS Implementation Plan. EMS Coordinator/Cross Functional Team meet to do the following: [Note: This step does not wait until the required independent third party audit of the EMS is completed.]
    a. act on the direction from the State/Center Management Team received during the end of year EMS review;
    b. select significant environmental aspects for the next round of EMS;

c. establish objectives and targets for the significant aspects;
d. present the significant aspects, objectives, and targets to the State/Center Management Team for approval;
e. prepare Environmental Management Programs for the next year;
f. implement actions assigned in the Environmental Management Programs
g. report on progress achieving the objectives and targets; and
h. present annual EMS Accomplishments Report to the State/Center Management Team.

22. The State Management Team will do the following:
    a. approve the significant aspects and their designated leads, objectives, targets for the current round of EMS;
    b. issue IM informing all employees on the current year's EMS;
    c. review the EMS Accomplishments Report; and
    d. take action and make recommendations regarding the EMS accomplishments to improve the State's environmental performance.

23. Implementation of EMS within the State/Center will be evaluated during the State Office's or Center's CASHE audit (occurs once every four years).

24. State/Center management reviews EMS findings from CASHE audit and provides guidance for the implementation by the EMS Coordinator/CFT.

25. State/Center reissues its Declaration of Conformance.

26. EMS process repeats to achieve continual improvement (see steps 21 and 22).

Time Commitment for Development of the EMS Implementation Plan:

When the State/Center elects to implement EMS, it will select an EMS Coordinator and members of a Cross Functional Team. During the initial development of the EMS, these individuals will have the following time commitments:

- half day for the initial training of what EMS is, its benefits, and how it has been implemented in the BLM;
- one hour phone interview to identify environmental impacts and aspects associated with their program; and
- intermittent short phone calls and emails to provide information to the contractor on policy and performance measures related to the environment that already exists in their program.

The contractor will prepare the following documents for review and comments by the Cross Function Team:

- Instruction Memorandum (IM) informing employees that the State/Center is implementing an EMS;
- objectives and targets for each significant environmental aspect addressed in the EMS (there are typically 5 or 6 significant aspects);
- draft EMS Implementation Plan (typically 30 pages long with appendices); and

- IM informing all employees that the EMS implementation has begun, what it addresses, and how the employees are involved

Estimated time commitment for the EMS Coordinator: 3 days a month for six months.

Estimated time commitment for the Cross Functional Team members: 2 days a month for six months

Time Commitment after the Initial EMS Kick Off:

The EMS Coordinator will remind the staff assigned tasks related to the objectives and targets in the EMS to report on those performance measures. If the significant environmental aspects in the EMS are truly significant, the State/Center is probably already working on and reporting on those performance measures. The EMS Coordinator gathers information from staff who were assigned actions in the EMS and prepares a written EMS Accomplishments Report. The report includes recommendations to improve the functioning of the EMS and environmental performance of the State/Center. This report is presented to the State/Center Management Team who takes actions/makes decisions on the EMS.

Estimated time commitment for the EMS Coordinator: 3 days a month, except the month the annual EMS Accomplishment report is prepared which will take about 4 days.

Estimated time commitment for the Cross Functional Team members: 2 days a month, except the month the annual EMS Accomplishment report is prepared which will take about 3 days.

Time Commitment After the Initial Year and the Cycle Begins Again:

The EMS Coordinator will form another Cross Functional Team to identify the significant environmental aspects that will be addressed in the EMS. The Cross Functional Team members may or may not be the same as the previous year. Some of the significant aspects from the previous year may be continued.

The EMS Coordinator will document the decisions made by the Cross Functional Team including, but not limited to: 1) identification of environmental impacts and aspects; 2) prioritization of aspects; and 3) selection of the significant environmental aspects. The lead assigned to each significant environmental aspect will prepare objectives and targets for review and approval by the Cross Function Team and the State/Center Management Team. The lead will prepare an Environmental Management Program for each significant aspect (2 pages maximum) summarizing the actions planned to achieve objective and targets after they are approved by the State/Center Management Team.

Staff will perform the tasks described in the Environmental Management Programs and report on progress made to the EMS Coordinator at least annually. The EMS Coordinator will prepare an EMS Accomplishments Report annually and present the results to the State/Center Management Team along with recommendations for actions and decisions to be made by the management team. The State/Center Management Team reviews the EMS Accomplishments Report and makes decisions on

corrective actions to be implemented to improve the State's or Center's environmental performance. The process begins again with the selection of significant environmental aspects for next year's EMS.

Estimated time commitment for the EMS Coordinator: 5 days a month for the first three months of a fiscal year and the last month of the fiscal year when consolidating the reports on progress related to EMS objectives and targets. The EMS Coordinator will spend about 2 days a month on EMS related activities the other eight months of the year.

Estimated time commitment for the Cross Functional Team members: 3 days a month for first three months of fiscal year and the last month of the fiscal year when reporting on progress related to EMS objectives and targets. The Cross Functional Team members will spend about a day a month on EMS related activities the other eight months of the year.

Appendix B
BLM EMS Policy

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240
http://www.blm.gov

May 8, 2006

In Reply Refer To:
1703 (WO-360) I

EMS TRANSMISSION 05/12/2006
Instruction Memorandum No. 2006-148

To: All Washington and Field Officials

From: Director

Subject: Environmental Management System Policy

Program Areas: Planning, Engineering, Procurement, Property, Facility Compliance

Purpose: The purpose of this Instruction Memorandum (IM) is to establish the Bureau of Land Management (BLM) policy on Environmental Management Systems (EMS). Improving efficiency and achieving cost savings throughout the Bureau of Land Management (BLM) is increasingly critical to the successful accomplishment of its mission. Implementation of EMS throughout the BLM will enhance overall mission performance through better environmental management. The purpose of EMS is to provide a framework to identify and address the environmental aspects of BLM's field operations and facilities and provide opportunities for continuous improvement and innovation, thus promoting effective and efficient operations. The implementation of EMS will provide opportunities for continuous improvement in environmental management, as well as bring the BLM into compliance with EMS mandates in Executive Orders 13101 and 13148 and Departmental Manual (515 DM 4). Federal agencies are graded by the Office of Management and Budget (OMB) and the President's Management Council on their performance in meeting the requirements of those Executive Orders including the implementation of EMS.

Policy/Action: BLM's multiple use mission has always included protection of the environment. We are committed to protection and reclamation of the public lands through the integration of environmental management within the framework of our resource protection, resource use, recreation, and serving communities mission. Systematic environmental management must be an integral part of BLM's day-to-day business practices and long-term planning processes across all programs. To that end, BLM shall adopt and implement EMSs. The EMS shall be documented, maintained, and communicated to employees.

This policy commits BLM to:

COMPLIANCE AND ENVIRONMENTAL MANAGEMENT

- Management team review, approval, and support of the EMS;

- Compliance with applicable federal, state, and local environmental requirements;
- Timely correction of issues identified in Compliance Assessment – Safety, Health, and the Environment (CASHE) audit findings;
- Budgeting for facility compliance and EMS;
- Communication of environmental performance in policies, programs, and services both internally and externally;
- Promotion of continuous improvement in environmental performance, including areas not subject to regulation, through target-setting, performance measurement and training;
- Periodic monitoring and tracking of EMS performance;
- Prevention of pollution at Bureau facilities to reduce costs and risk; and
- Promotion of sound environmental practices on the public lands.

Timeframes: EMSs will be in place and in operation Bureauwide by the end of FY 2010. A separate IM will discuss the EMS implementation strategy.

Background: The Secretary has already committed to implementation of EMS at the Department, Bureau, and facility level. Executive Orders 13148 and 13327 each require EMS implementation by all Federal Agencies. OMB's Environmental Management Scorecard, provided as Attachment 1 incorporates metrics directly from Executive Orders 13101 and 13148.

Budget Impact: Minerals, Realty, and Resource Protection (WO-300) has requested central funding to pay for the development of EMS Implementation Plans throughout the Bureau.

Manual/Handbook Sections Affected: None.

Coordination: This policy has been coordinated among the following directorates: Renewable Resource and Planning (WO-200); Minerals, Realty, and Resource Protection (WO-300); and Business and Fiscal Resources (WO-800). Coordination was also done with State Office Hazardous Material Management Program Leads and State Engineers.

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Signed by:
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1 Attachment

1 – OMB Environmental Management Scorecard (2 pp)

Appendix C
Example Objectives and Targets for each Core Aspect

The State Offices or National Centers implementing EMS may choose to use, or not use, any of the suggested objectives and targets in this section. The objectives and targets detailed here are meant to be starting points. Implementing organizations should modify these objectives and targets to address the actual activities and significant aspects of their operations.

Aspect: Energy Management

Objective: Improve energy efficiency and reduce greenhouse gas emissions through the reduction of energy intensity at BLM owned facilities.
Associated Targets:

- Provide all offices with information on their energy consumption and establish their baseline fiscal year 2003 usage.
- Reduce energy used at BLM owned facilities by 20 percent, based on the fiscal year 2003 baseline, by the end of fiscal year 2015.
- Track usage and measure energy usage at each office.

Objective: Educate State and Field Office employees on their role in energy conservation
Associated Targets:

- Train State and Field Office engineering personnel on energy saving practices and construction, as well as, Federal requirements at the Engineering Meeting by September 2009.
- Train State and Field Office employees on energy saving practices via Instructional Memorandum by September 2009.
- Post fliers reminding personnel of energy saving practices throughout State and Field Offices by September 2009.

Objective: Utilize renewable power sources in new construction and building renovations whenever ever possible.
Associated Targets:

- Perform a feasibility study for a renewable power source to provide electricity in one new construction or renovation project by September 2009.
- Submit a renewable power project into the 5 Year Plan by May 2010, with the earliest installation in 2012.

Objective: Reduce the amount of nonrenewable power purchased from local utility companies.
Associated Targets:

- By November 2008, obtain CY 2006 baseline data regarding:
    a. the number of employees working at the State Office during CY 2006
    b. the number of kilowatt hours purchased from the local utility company during CY 2006
    c. the source of power generation during CY 2006
- Increase the amount of renewable power (wind, solar, or hydroelectric) purchased from the local utility company by 5% by 2009.

Objective: Increase the use of available mass transportation and other techniques by staff commuting to work in order to minimize dependence on fossil fuels and help improve air quality in the metropolitan area.
Associated Targets:

- By November 2008, obtain CY 2006 baseline data regarding:
    a. the number of employees working in the State Office during CY2006
    b. numbers of employees driving to work
    c. miles driven
    d. employees utilizing mass transit by type
    e. telecommuting activities
    f. carpooling activity
- Issue an Informational Bulletin (IB) to inform State Office employees of available Metro commuting resources by October 2009, including available internet websites.
- By March 2009, set appropriate and measurable goal(s), based upon the 2006 Baseline data, for increasing the use of mass transportation in CY 2010. The goal or goals will be presented during the annual management review.

Objective: Decrease the total business miles traveled by employees in order to minimize dependence on fossil fuels and help improve air quality throughout the United States.
Associated Targets:

- By August 2008, develop CY2007 baseline data regarding:
    c. numbers of employee travel days
    d. mode of travel
- Train State Office personnel on the availability and use of teleconference, video conference, and internet conference capabilities by November 2008.
- By March 2009, set an appropriate and measurable goal(s) to reduce business miles traveled. The goal or goals will be presented during the annual management review.

Aspect: Green Procurement

Objective: Educate State Office and Field Office employees about their roles in green procurement.
Associated Targets:

- Train State Office and Zone procurement employees on green procurement resources and Federal requirements during the annual procurement workshop by September 2009.
- Train State and Field Office credit card holders on green procurement information resources and Federal requirements via Instructional Memorandum by September 2009.

Objective: Establish a tracking system to monitor State Office green purchasing practices.
Associated Targets:

- Design and implement a tracking spreadsheet that monitors the volume of green purchasing occurring in the State Office by September 2009.
- Educate all procurement on the use of the spreadsheet by November 2009.

Objective: Minimize solid waste generation at the State Office.
Associated Targets:

- Complete conversion of personnel files to electronic files by the end of CY 2008.
- Ensure all procurement officials (warranted officials and purchase card holders) complete Environmentally Preferable Purchasing training by August 2009.
- Prepare a Green Procurement Plan for the organization by the end of FY 2009.
- Calculate FY 2007 baseline data regarding the amount of solid waste generated per employee at the State Office that was disposed of in a landfill by January 1, 2009 (total tonnage of solid waste generated in CY 2006/number of State Office employees).
- Investigate recycling opportunities beyond paper and modify janitorial/trash collection contracts as necessary to incorporate appropriate additional recycling measures by November 2009.
- Place recycling collection centers in all major hallway and public areas and actively manage and document recycling efforts by November 2008.
- Issue an Informational Bulletin regarding recycling opportunities and procedures for all employees by December 2009.

Objective: Integrate green purchasing into emergency response programs.
Associated Targets:

- Evaluate the availability of green spill response materials by October 2009.
- Incorporate the requirement for the purchase of green spill response materials into Emergency Response Procedures by March 2009.

Objective: Reduce the amount of harmful chemicals purchased for maintenance purposes.
Associated Targets:

- Inventory the chemicals used by the State Office for maintenance purposes by January 2009.
- Evaluate chemicals used for maintenance purposes for replacement with less hazardous products by July 2009.
- Modify janitorial services contract to require the use of recycled content paper products and trash bags that comply with EPA's Comprehensive Procurement Guidelines and the use of cleaning products that are Green Seal certified by September 2009.
- Switch all parts washers currently using chemical solvents to enzymatic or simple green parts washers by January 2010.

Objective: Reduce the amount of nonrenewable fuels purchased.
Associated Targets:

- Increase the number of hybrid vehicles in the State fleet by 5% by December 2009.
- Evaluate the feasibility of a biodiesel operation at the Field Office by January 2009.
- If deemed feasible, implement a biodiesel operation at the Field Office by December 2010.

Aspect: Monitoring Condition of Public Land

Objective: Monitor the rangeland habitat to ensure resource management objectives are achieved.
Associated Targets:

- Monitor eight herd management areas (HMAs) for utilization and distribution of the horses and burros by September 31, 2009 and annually thereafter.
- Initiate the evaluation of the appropriate management levels (AMLs) for four HMAs to ensure they are still appropriate by December 31, 2009 and the final evaluation document to be completed by

September 31, 2010. Four (4) different HMA evaluations will be initiated annually, thereafter, until all HMAs within the State are evaluated.

Objective: Maintain appropriate management levels on the State's HMAs through animal removal in order to maintain a state-wide population size of approximately 3,500 wild horses.
Associated Targets:

- By September 31, 2009 and annually thereafter, conduct the appropriate level of animal removals (approximately 20% of total statewide population), if deemed necessary by population inventory and habitat monitoring, in order to maintain the statewide population of approximately 3,500 wild horses.

Objective: Improve, restore, and maintain the health of watersheds and landscapes.
Associated Targets:

- Calculate CY 2006 baseline data on the percentage of wetland areas achieving desired conditions by July 2009.
- Identify a reasonable goal for increasing the percentage of wetland areas achieving desired conditions by October 2009.
- Calculate CY 2006 baseline data on the number of acres restored or enhanced to achieve habitat conditions to support species conservation by July 2009.
- Identify appropriate and measurable goal(s) for increasing the number of acres restored or enhanced to achieve habitat conditions to support species conservation by October 2009. The goal or goals will be presented during the annual management review.

Objective: Protect cultural and natural heritage resources.
Associated Targets:

- Calculate CY 2006 baseline data on the percentage of BLM cultural properties in good condition by February 2009.
- Identify appropriate and measurable goal(s) to increase the percentage of cultural properties in good condition by October 2009. The goal or goals will be presented during the annual management review.

Objective: Minimize the impact public lands from timber sales.
Associated Targets:

- Calculate CY 2006 baseline data regarding the number of roads constructed to reach 2006 timber sales goals by the February 2009.
- Identify a reasonable goal to reduce the number of roads constructed to achieve 2008 timber sales goals by October 2010.
- Calculate CY 2006 baseline data regarding the number of timber sales located in fuels reduction areas by February 2009.
- Identify appropriate and measurable goal(s) to increase the number of 2009 timber sales located in fuels reduction areas by October 2010. The goal or goals will be presented during the annual management review.

Objective: Promote organizational efficiency and effectiveness by developing and implementing a comprehensive Assessment, Inventory, and Monitoring strategy.
Associated Targets:
Due to the ongoing development of the Assessment, Inventory, and Monitoring strategy, it is premature to ask for participation or information from the State Offices. However, in the future, as the strategy is further developed, field participation will be an integral part to ensuring the success of the strategy. At the time that field participation becomes critical, adding the Assessment, Inventory, and Monitoring strategy as an objective and target to an organization's EMS will facilitate the communication between the field and Washington Office. The Core Aspect Guidance will be updated in the future and example targets will reflect the actual needs of the Assessment, Inventory, and Monitoring strategy. An example target that may be included in the future is provided below. For more information on the Assessment, Monitoring, and Inventory strategy, please contact Gordon Toevs (Gordon_Toevs@blm.gov) or Craig MacKinnon (Craig_MacKinnon@blm.gov).
Example target:

- Complete 90% of the required soil surveys by June 2025.

Objective: Ensure a diverse and representative number of native plant and animal species are found on the public land through the use of the Healthy Lands Initiative. (For more information on the Healthy Lands Initiative, contact Jim Dryden at the Washington Office, jim_dryden@blm.gov.)
Associated Targets:
- Complete the Three to Five Year Program of Work for the Healthy Lands Initiative by August 2009.
- Establish naming criteria for identifying regional focal areas for the States Healthy Lands Initiative work by August 2009.
- Identify the regional focal areas for the State's Healthy Lands Initiative work by August 2009.
- Identify appropriate and measurable goals for maintaining or increasing the number of species of management concern (i.e., sage grouse, prong horn deer, etc.) on the public lands by August 2009.
- Establish a program for monitoring focal area criteria levels and comparing those levels with desired levels by January 2010.
- Report the percentage of focal area projects initiated or completed annually.

Aspect: Reclamation of Public Land

Objective: Establish State wide policy and direction on disturbed land reclamation, which address any activities on public lands.
Associated Targets:
- Discuss the policy with State reclamation officials and external interested parties. Document their input by June 2009.
- Incorporate information received from all interested parties into the draft policy by December 2009.
- Finalize and distribute the BLM State reclamation policy and guidance by September 2010.

Objective: Develop reclamation standards for the State to be implemented on all public lands.
Associated Targets:
- Discuss the reclamation standards with State reclamation officials and external interested parties. Document their input by June 2009.
- Incorporate information received from all interested parties into the draft standards by September 2009.
- Finalize and distribute the BLM State reclamation standards by September 2010.

Objective: Incorporate reclamation requirements in land leases.
Associated Targets:

- Evaluate land lease terms for reclamation requirements by October 2009.
- Evaluate current State reclamation activities in regard to current land lease reclamation terms, in order to determine the effectiveness of the terms by January 2010.
- Revise land lease terms to reflect land reclamation needs by September 2010.

Objective: Improve the condition of reclaimed lands.
Associated Targets:

- Establish the CY 2006 baseline for the acres of State land brought into good environmental condition through reclamation efforts by September 2009.
- Increase the number of acres of State land brought into good environmental conditions through reclamation efforts by 3% annually beginning in September 2010.
- Implement an inspection program that revisits closed reclamation sites 5 years after closure by September 2010.

Objective: Remove unnecessary dams that impede spawning routes of endangered fish.
Associated Targets:

- Evaluate 10% of all dams in the State Office for necessity by January 2010.
- Initiate dam removal process for one unnecessary dam by July 2010.