



**DEPARTMENT OF THE ARMY**  
**U.S. ARMY CORPS OF ENGINEERS**  
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WASHINGTON, DC 20314-1000

CECW-CO (1130)

**MEMORANDUM FOR CHIEFS, OPERATIONS, MAJOR SUBORDINATE  
COMMANDS, DISTRICT COMMANDS AND U.S. ARMY ENGINEER RESEARCH AND  
DEVELOPMENT CENTER**

**SUBJECT: Policy Update for Environmental Compliance Assessment Cycle VIII**

1. Purpose. This memo kicks-off the eighth, 5-year cycle (Cycle VIII) of environmental compliance assessments and renews the U.S. Army Corps of Engineers (USACE) Civil Works Operations corporate commitment to excellence in environmental compliance.

2. Reference. Engineer Regulation (ER) 200-2-3, Chapter 5, Environmental Compliance Assessments, 1 September 2022.

3. Background. The USACE Environmental Compliance Program implemented in accordance with ER 200-2-3 is the internal control for ensuring USACE facilities and missions are operated and maintained in compliance with applicable environmental laws and regulations. The environmental compliance performance metrics for scheduling and executing assessments, correcting findings, and annually reviewing the Project Site Survey (PSS) will continue into Cycle VIII. (refer to Enclosure 1).

4. Discussion.

a. The most significant change for USACE Environmental Compliance Program for Cycle VIII is the update of ER 200-2-3, which was published 29 November 2022. The updated ER incorporates new and modified policies implemented since the previous ER was published in October 2010, including:

(1) USACE environmental aspects of its missions, activities, and functions are managed within the framework of environmental management systems (EMS).

(2) The scope of ER 200-2-3 applicability is expanded to all USACE facilities and missions in the US and its' territories.

(3) Regional Assessment Teams are integrated into a MSC's external assessment schedule. How this is accomplished is at the discretion of the MSCs and Districts in coordination with HQ.

(4) Oil Accountability Plans must be developed to track lubricant use at specific projects.

b. The environmental compliance review completed as part of the 2023 Risk Management and Internal Control (RMIC) Program cycle disclosed that USACE did not meet our goal of correcting 75% prior-year findings. HQ will begin to provide improved visibility on completed corrective actions against the total corrective actions by year. A dashboard will be active on the NRM Knowledge Management Portal and provide status of corrective actions not completed.

5. HQUSACE completed a survey within the Environmental Compliance Coordinators (ECCs) Community on 15 November 2024 to better understand ECCs training needs. Based on the survey results, HQUSACE will develop a hybrid approach to ECC training, to include a variety of online training modules focused on environmental compliance requirements (the “what”), combined with regional in-person offerings focused on interactive discussion of case studies and field visits (the “how”). HQUSACE is also exploring with the USACE Learning Center PROSPECT Program to develop an Environmental Review Guide for Operations (ERGO) class. All combined, these offerings intend to make environmental compliance training and refreshers more readily available to new and seasoned ECCs. The training program development is ongoing and the ECC Community will be updated on a regular basis.

6. In FY25, and while the training program is being developed, if a Division or District is interested in sponsoring an Environmental Compliance training class, please coordinate your request with Myrna Lopez. Please note the Division/District may be responsible for funding the travel and labor for all instructors during the training week.

7. The Point of Contact for the USACE Environmental Compliance Program is Myrna Lopez, 202-706-4219, [myrna.i.lopez-ortiz@usace.army.mil](mailto:myrna.i.lopez-ortiz@usace.army.mil). Thank you for your continued leadership in support of the Civil Works Operations Environmental Compliance Program.

Encl

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## Enclosure 1

### Environmental Compliance Metrics

USACE will continue tracking the following (existing) performance measures during Environmental Compliance Assessment Cycle VIII (FY 25-FY29):

1. Rate (%) of Scheduled Environmental Compliance Assessments (both Internal and External) completed annually by 30 September of each year. All data should be entered in the environmental compliance tracking system of record by 31 October of each year.
  - (Goal: 100%)
2. Rate (%) of Findings (prior-year findings) corrected annually
  - (Goal: 75%)
3. Project Site Survey (PSS) annual update in the environmental compliance tracking system of record
  - (Goal: 100%)

## Enclosure 2

### Additional Information for the FY27 Budget Development Relative to Environmental Compliance

- a. ER-200-2-3, Section 2-1.d specifies that each business line is responsible, in coordination with their supporting Environmental Compliance Coordinator (ECC), to plan, program, budget, and execute their mission in a manner that is fully compliant with environmental compliance requirements.
- b. In accordance with Section 5.7.d of the ER, each USACE facility must annually program funding and allocate manpower within each relevant business line for the business-year-plus-two timeframe, including closing outstanding findings as result of environmental assessments.
- c. Chapter 11 of ER 200-2-3 provides general information to build budget packages to fund corrective measures and close outstanding findings. This information has since been updated in the FY27 Program Delivery Guidance (PDG), Appendix D. For future FYs please refer to the applicable PDG and Appendix.
  - a. Project and District Operation Managers must work with Project and District ECCs to create work packages to address outstanding findings within their purview. The finding's unique identifier from the system of record (i.e. currently CPTrack, which is transitioning to an environmental compliance module in CWBI), shall be included in the Work Package remarks. The work package description will identify the nature of the finding: 1) corrective measures for findings related to compliance with the requirements of 29 CFR (OSHA Regulations); 2) corrective measures for compliance with the requirements of the USACE safety manual; 3) corrective measures for compliance with Federal environmental requirements; 4) corrective measures for compliance with State environmental requirements; 5) corrective measures for compliance with USACE environmental policies.
  - b. In order to properly categorize the work associated with the correlating Business Line, it is imperative to use the proper work category codes to budget, execute and track these corrective action efforts appropriately (refer to the PDG Appendix D for coding information). Work packages will be assigned a LoP of SWNCP; and Prioritization Framework Values B, D or H unless they fall under one of the no mission or partial mission categories.
  - c. Funding for corrective measures will be included within Civil Works Operations business line budgets. For circumstances where implementation of corrective action is contingent upon receipt of additional funding, USACE policy is to clearly and formally document the funding need through the budget process, and to continue to identify the need until full compliance is achieved. ECCs at all levels will support preparation of budget packages for environmental compliance requirements. Districts shall include a budget package beginning in the FY27 budget build for each corrective action not completed, regardless of the year of the finding, that cost more than \$5,000. Corrective actions that require less than \$5,000 should be accomplished as part of larger business line packages for general operations and maintenance routine operations or maintenance.
  - d. Funded packages are expected to be completed in that budget year. Packages shall be entered into CWIFD as part of the budget process by business line and in accordance with the O&M 20/20 prioritization framework. Additional visibility of obligating and expending the funding for corrective actions may be part of annual performance metrics.