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Air Force Base Conversion Agency  
***BRAC 95 Base Conversion Process***  
***Workshop***

**BRAC Environmental Process**



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# BRAC Environmental Process

## [Block 4]

### OBJECTIVE

- **Provide attendees with information on the processes for determination of environmental condition of property, environmental site cleanup, and environmental impact analysis**

### OUTCOME

- **Attendees will be informed of the various elements of the BRAC environmental process, including:**
  - **Environmental impact analysis of disposal actions**
  - **Environmental Baseline Surveys**
  - **The Community Environmental Response Facilitation Act**
  - **BRAC Cleanup Teams and BRAC Cleanup Plans**
  - **Restoration Advisory Boards**
  - **Findings of Suitability to Transfer (FOSTs)**



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### Quiz—BRAC Environmental Process

1. Which elements of a redevelopment plan might have the greatest impact on the strategies that will be developed by the BRAC Cleanup Team? Why?
2. True or false: An EIS is required for all Air Force disposal actions.
3. True or false: A building containing asbestos cannot be identified as part of an uncontaminated parcel for CERFA compliance purposes.
4. What are the two principal categories of compliance activities at a BRAC installation?
5. Which of the following is not one of the steps in the FOST process:
  - a) Conduct a visual site inspection?
  - b) Notify the public of signature of the FOST?
  - c) Complete, coordinate, and sign the FOST?
  - d) Complete the transfer documents for Category 6 property?
  - e) Prepare draft EBS/FOST?
  - f) Notify regulatory agencies of the intent to initiate the FOST process?
  - g) Retain FOST and comments at Operating Location?
6. True or false: Petroleum products and their derivatives are no longer exempt under the Petroleum Exclusion of CERCLA.
7. True or false: No property with residual contamination can be transferred by deed because of CERCLA covenant requirements.

# National Environmental Policy Act (NEPA)



■ Provides a process to help Federal officials make decisions that are based on an understanding of environmental consequences

■ Regulations:

- Council on Environmental Quality [40 CFR Parts 1500–1508]
- DoD [32 CFR Part 214]
- Air Force [32 CFR Part 989, AFI 32-7061]



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## Applicability of National Environmental Policy Act under DBCRA 1990 and Title XXIX

### DBCRA 90:

#### SEC. 2905. IMPLEMENTATION.

**(c) APPLICABILITY OF NATIONAL ENVIRONMENTAL POLICY ACT OF 1969.**—(1) The provisions of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) shall not apply to the actions of the President, the Commission, and, except as provided in paragraph (2), the Department of Defense in carrying out this part.

(2)(A) The provisions of the National Environmental Policy Act of 1969 shall apply to actions of the Department of Defense under this part (i) during the process of property disposal, and (ii) during the process of relocating functions from a military installation being closed or realigned to another military installation after the receiving installation has been selected but before the functions are relocated.

(B) In applying the provisions of the National Environmental Policy Act of 1969 to the processes referred to in subparagraph (A), the Secretary of Defense and the Secretary of the military departments concerned shall not have to consider—

- (i) the need for closing or realigning the military installation which has been recommended for closure or realignment by the Commission;
- (ii) the need for transferring functions to any military installation which has been selected as the receiving installation; or
- (iii) military installations alternative to those recommended or selected.

(3) A civil action for judicial review, with respect to any requirement of the National Environmental Policy Act of 1969 to the extent such Act is applicable under paragraph (2), of any act or failure to act by the Department of Defense during the closing, realigning, or relocating of functions referred to in clauses (i) and (ii) of paragraph (2)(A), may not be brought more than 60 days after the date of such act or failure to act.

**(d) WAIVER.**—The Secretary of Defense may close or realign military installations under this part without regard to—

- (1) any provision of law restricting the use of funds for closing or realigning military installations included in any appropriations or authorization Act; and
- (2) sections 2662 and 2687 of title 10, United States Code.

### Title XXIX:

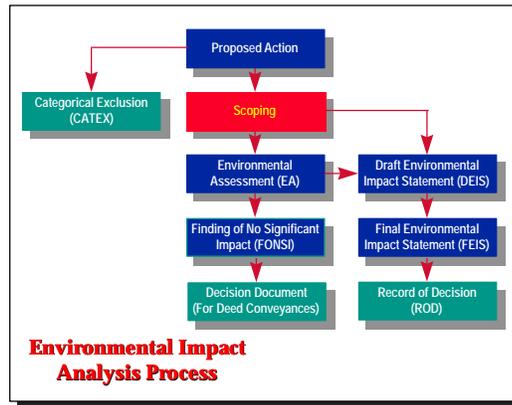
#### SEC. 2911. COMPLIANCE WITH CERTAIN ENVIRONMENTAL REQUIREMENTS RELATING TO CLOSURE OF INSTALLATIONS.

Not later than 12 months after the date of the submittal to the Secretary of Defense of a redevelopment plan for an installation approved for closure under a base closure law, the Secretary of Defense shall, to the extent practicable, complete any environmental impact analyses required with respect to the installation, and with respect to the redevelopment plan, if any, for the installation, pursuant to the base closure law under which the installation is closed, and pursuant to the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.).

Reference: Complete text of these laws is found in Appendix B, DoD Base Reuse Implementation Manual

# Scoping in Environmental Impact Analysis

## ■ Legal requirements for NEPA Scoping:



- > Use to identify issues that are significant and to de-emphasize those that are not
- > Narrow scope of analysis
- > Commence if any agency will prepare an EIS
- > Invite public participation

## ■ Goal: Get everyone's input early in the process!



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Options for complying with the National Environmental Policy Act (NEPA) are shown above. A major requirement of NEPA is the incorporation of public comments and perceptions into the Federal decision-making process. At many BRAC installations, this is done in part through the Environmental Impact Statement (EIS) process, which uses “scoping” to identify the:

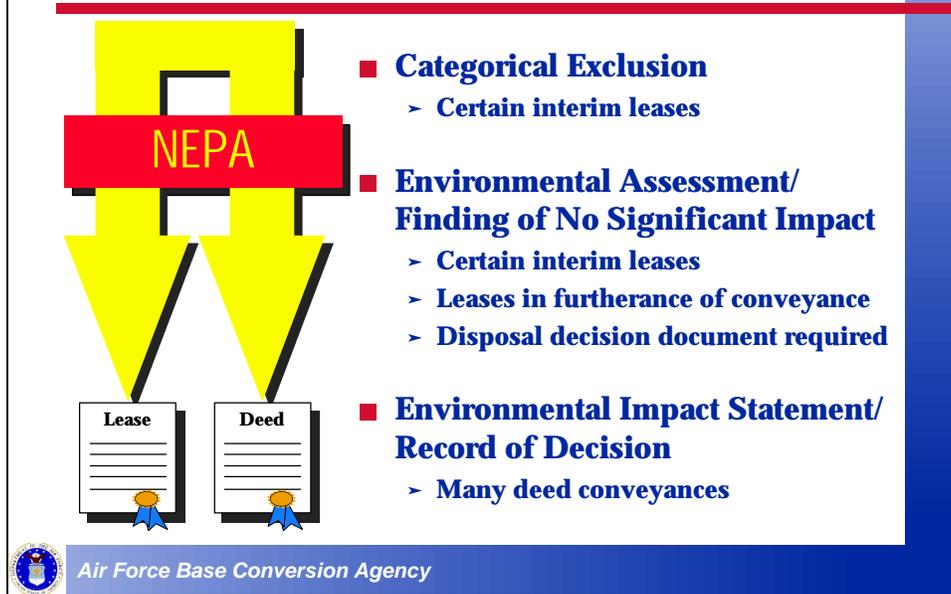
- Public concerns
- Critical issues
- Range of alternatives
- Permit and consultation requirements
- The appropriate levels (and sequence) of environmental reviews

Effective scoping identifies and focuses attention on important matters early in the environmental analysis and results in informed decisions, cost-effective analysis and decision making, public credibility, and fewer appeals and lawsuits. In many cases, the Air Force will hold a public scoping meeting as part of the overall scoping process (required for all EISs). This meeting *may or may not* occur during the first 6 to 12 months of reuse planning. Its timing will be dependent on circumstances specific to the installation and may occur before completion of a redevelopment plan.

DoD policy requires the Air Force to evaluate reasonable alternatives for the disposal of base property (other than the redevelopment plan). The scoping process can greatly facilitate the early identification of these reasonable alternatives.

*References: DoD Guidance on Accelerating the NEPA Analysis Process for Base Disposal Decisions (Appendix B, BRAC Cleanup Plan Guidebook), and Military Department NEPA Implementation Regulations and Guidance*

## NEPA Compliance at BRAC Installations



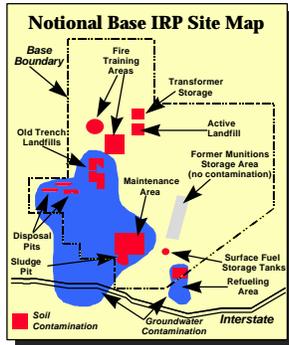
Actions at BRAC installations that will or may trigger NEPA compliance (or most all pathways to reuse must consider NEPA):

- Property Conveyances by the Air Force (will)
- Sponsored/Approved Conveyances by other Federal Agencies (will)
- Interim Leases (will)
- Leases in Furtherance of Conveyance (will)
- Leasehold Improvements (may)
- Environmental remedial actions (may)
- Changes in parcel configuration after Disposal ROD issued (may)

*Key points of DoD Guidance on Accelerating the NEPA Analysis Process:*

- NEPA analysis (for disposal decisions) will be completed within 12 months after Air Force receipt of redevelopment plan
- Redevelopment plan, when available, will be the basis for the proposed action
- Air Force still required to conduct alternatives analysis
- If LRA fails to submit redevelopment plan, NEPA analysis will still occur, using reasonable reuse assumptions as basis for alternatives analysis
- Where EIS is required, Air Force will assure that process is initiated at appropriate time (in order to fulfill 12-month requirement)
- Data-gathering activities should occur as early in the process as possible, and may occur before formal Notice of Intent to Conduct an EIS is published in *Federal Register*
- Data development and analysis process will be conducted in cooperation with community officials, EPA, and other anticipated formal cooperating agencies
- If no redevelopment plan emerges before Draft EIS is needed to support property disposal, advance EIS work can be used to analyze alternatives
- Common reuse scenarios should be analyzed in advance, whenever possible

# Environmental Baseline Survey (EBS)



- **Survey Activities Include:**
  - Records search and review, including prior property ownership documents
  - Aerial photography analysis
  - Interviews
  - Visual inspections
  - Contamination source identification
  - Ongoing response actions
  - Adjacent facility records search and review
  - Visual/physical inspection of adjacent property
- **EBS Report Documents Findings**



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## Environmental Baseline Surveys

- Refers to both a process (survey activities are shown above) and a report (EBS Report)
- Establish the environmental baseline at the time of property transactions
- Establish the baseline against which future environmental liability claims will be measured
- Required by DoD CERFA and FOST/FOSL policies, and Air Force Instruction 32-7066 and AFBCA FOSL/FOST Procedures
- Used to support uncontaminated property identification under CERFA, and all lease and deed transactions
- Base-wide EBS consists of at least those activities identified above; supplemental or site-specific EBSs may require additional activities, where appropriate
- Earliest workable draft documents should be provided to regulators
- Supplemental EBSs require at least visual site inspections and may require other survey activities, if necessary
- The EBS is based on existing environmental information related to storage, release, treatment or disposal of hazardous substances or petroleum products to determine or discover the presence or likely presence of a release or threatened release
- An EBS is also useful at the end of a lease (to help prepare lease close-out environmental condition reports, e.g., whether environmental conditions have changed during the term of the lease)

See Also: *Appendix F, DoD Base Reuse Implementation Manual*

## Environmental Condition of Property Categories (Area Types)

1. No Storage, Release, Disposal, or Migration of Hazardous Substances or Petroleum Products
2. **Only Storage (No Release, Disposal, or Migration)**
3. **Storage, Release, Disposal, or Migration, but No Removal/Remedial Actions Required**
4. **Required Removal/Remedial Actions Have Been Taken**
5. **Removal/Remedial Actions Under Way**
6. **Response Actions Not Yet Implemented**
7. Further Evaluation Required



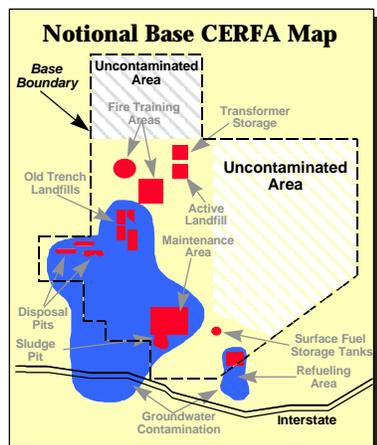
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### Seven Environmental Condition of Property Categories (“Area Types”)

These categories are tools that help classify BRAC properties in support of FOSTs and FOSLs. The term “Environmental Condition of Property Area Type” refers to one of the seven categories defined in the *BRAC Cleanup Plan Guidebook* (Section 4.10) and below:

1. No storage, release, or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties).
2. Only storage of hazardous substances [or petroleum products or their derivatives] has occurred (but no release, disposal, or migration from adjacent properties has occurred).
3. Storage and release, release, disposal, and/or migration of hazardous substances [or petroleum products or their derivatives] has occurred, but at concentrations that do not require a removal or remedial action.
4. Storage and release, release, disposal, and/or migration of hazardous substances [or petroleum products or their derivatives] has occurred, and all remedial actions necessary to protect human health and the environment have been taken.
5. Storage and release, release, disposal, and/or migration of hazardous substances [or petroleum products or their derivatives] has occurred, removal and/or remedial actions are under way, but all required actions have not yet been taken.
6. Storage and release, release, disposal, and/or migration of hazardous substances [or petroleum products or their derivatives] has occurred, but required response actions have not yet been initiated.
7. Unevaluated or requires additional evaluation.

# The Community Environmental Response Facilitation Act (CERFA)



- Provides for identification of uncontaminated base property within 18 months after approval (28 March 1997)
- Requires completion of an EBS
- Requires regulatory concurrence on identification
  - > NPL base—EPA
  - > Non-NPL base—State



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## CERFA

Enacted on 19 October 1992, the Community Environmental Response Facilitation Act [CERFA, Pub.L. 102-426] amends Section 120(h) of CERCLA by adding the following:

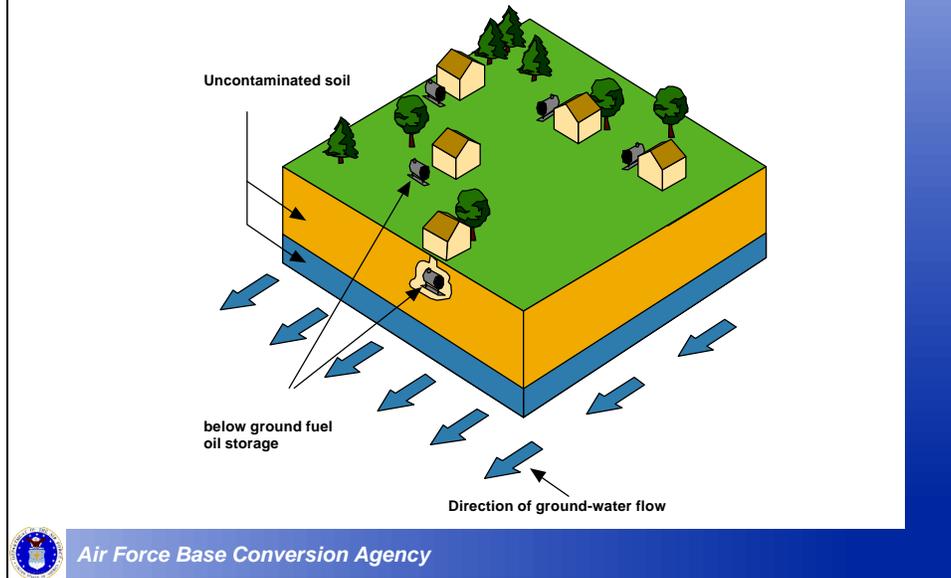
- Minimum procedures and strict timelines for identifying uncontaminated property at closing military installations [new Section 120(h)(4)]. These established procedures require the EPA (for NPL BRAC installations), or the "appropriate State official" (for non-NPL installations), to concur with DoD's uncontaminated property identifications. **For BRAC 95, this identification and concurrence must be completed by no later than 18 months after the date of approval.** Failure by the State to respond within 90 days of this statutory timeframe will be considered concurrence. The EPA has no such statutory deadline, but has agreed as a matter of policy to respond within 90 days.
- Language clarifying the interpretation of the covenant in section 120(h)(3)(B)(i) that **all remedial action** has been taken to protect human health and the environment [modified Section 120(h)(3)].
- Requirements for Federal agencies (e.g., the Military Department) to notify States of leases that will encumber base property beyond the scheduled closure date [new Section 120(h)(5)].

### Highlights of DoD Policy on CERFA identification process

- Regulatory agencies are notified at initiation of EBS
- EBS documentation (workable draft) is provided to regulators as it becomes available
- Military Department official reviews EBS and determines which property is uncontaminated (property on which no hazardous substances or petroleum products or their derivatives were stored for one year or more, released, or disposed of)
- Identification is provided to EPA, State, and local government officials (and to public), no later than 120 days before statutory deadline
- Comments, if received during first 90 days, are addressed and resolved whenever possible
- EBS report, along with regulatory comments, Military Department responses to comments, and signed regulatory concurrence will be included in installation records
- Property cannot be transferred until NEPA compliance has been achieved

Reference: DoD Guidance on the Implementation of the Community Environmental Response Facilitation Act

## Environmental Condition of Property Example #1



Based on information contained in an Environmental Baseline Survey, the BRAC Environmental Coordinator is able to draw the diagram shown above. Based on the information presented, what Environmental Condition of Property Category(ies) or Area Type(s) are shown?

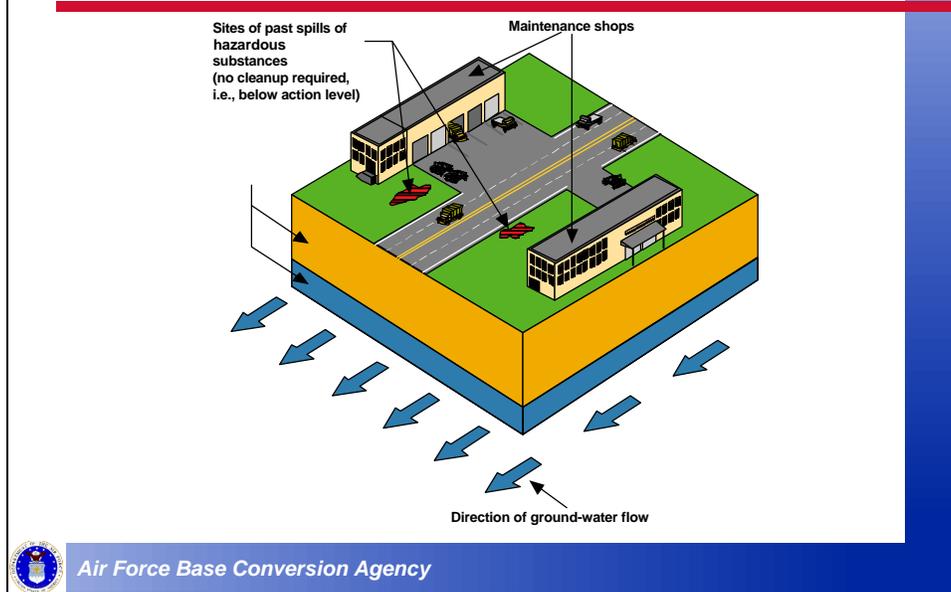
Answer:                    1           2           3           4           5           6           7

What other information would you need to know in order to identify this property as “uncontaminated” within the meaning of the Community Environmental Response Facilitation Act (CERFA)?

Answer:

*Reference: BRAC Cleanup Plan Guidebook, Section 4.10*

## Environmental Condition of Property Example #2



Based on the information presented above, what Environmental Condition of Property Category or Area Type is shown?

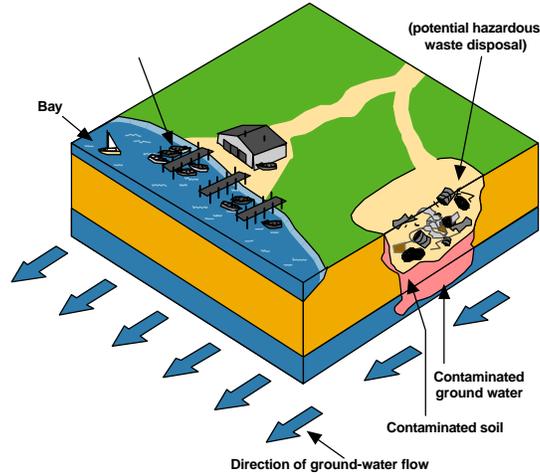
Answer:                    1           2           3           4           5           6           7

If this area were identified as a disposal parcel, could it be transferred by deed?

Answer:                    Yes                    No

*Reference: Fast Track to FOST, A Guide to Determining if Property is Environmentally Suitable for Transfer, Interim Final, February 1995*

## Environmental Condition of Property Example #3



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Based on the information presented above, what Environmental Condition of Property Category or Area Type is shown?

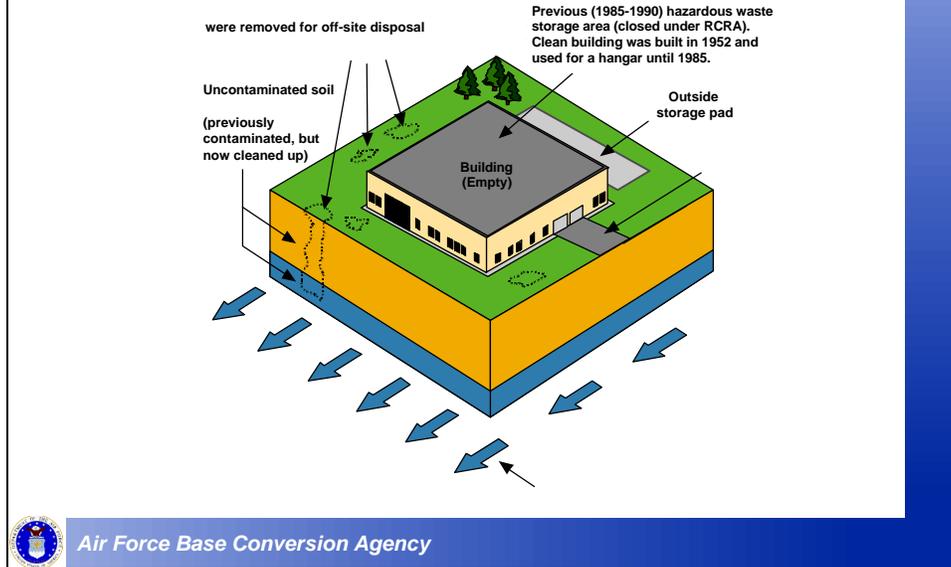
Answer:                    1           2           3           4           5           6           7

If this area were identified as a disposal parcel, could it be transferred by deed?

Answer:                    Yes                    No

*Reference: Fast Track to FOST, A Guide to Determining if Property is Environmentally Suitable for Transfer, Interim Final, February 1995*

## Environmental Condition of Property Example #4



Based on the information presented above, what Environmental Condition of Property Category or Area Type is shown?

Answer:                    1           2           3           4           5           6           7

If this area were identified as a disposal parcel, could it be transferred by deed?

Answer:                    Yes                    No

*Reference: Fast Track to FOST, A Guide to Determining if Property is Environmentally Suitable for Transfer, Interim Final, February 1995*

## BRAC Cleanup Teams

### ■ Purpose of BCTs

- > On-site, real-time decision making
- > Issues and schedules



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The BRAC Cleanup Team should have the authority, responsibility, and accountability for environmental cleanup programs at BRAC installations, emphasizing those actions that are necessary to facilitate reuse and redevelopment

### **References:**

DoD Guidance on Establishing Base Realignment and Closure Cleanup Teams (part of the Fast Track Cleanup at Closing Installations memorandum), September 1993

*BRAC Cleanup Plan (BCP) Guidebook*, Department of Defense, Fall 1993

## Restoration Advisory Boards

### ■ Purpose of RABs

- Increase public participation
- Advice on environmental restoration
- Information to and from community
- Complements other community involvement



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### Purpose of RABs

- DoD created RABs to ensure that all stakeholders have a voice and can actively participate in a timely and thorough manner in the review of environmental restoration documents
- RAB community members provide advice as individuals to the decision-makers on environmental restoration issues. The RAB is not intended to be a consensus body.
- The RAB is intended to enable early and continued flow of information among the affected community, DoD, and environmental oversight agencies.
- The RAB complements other community involvement efforts, but does not replace them.
- Section 324 of the National Defense Authorization Act for Fiscal Year 1996 placed certain restrictions on the types and amounts of technical assistance the Department of Defense can provide to RABs.

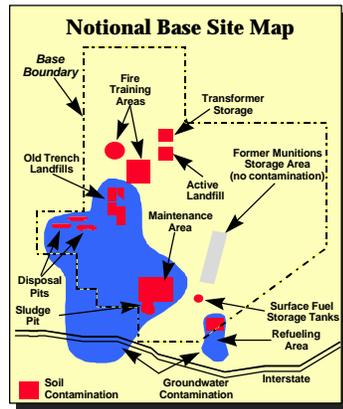
#### **References:**

DoD Guidance on Improving Public Involvement in Environmental Cleanup at Closing Bases (part of the memorandum on Fast Track Cleanup at Closing Installations), September 1993

Restoration Advisory Boards Implementation Guidelines, Department of Defense and United States Environmental Protection Agency, September 1994

10 U.S.C. 2705

## BCT Issues



### ■ Environmental Programs

- > IRP and regulatory programs
- > Programming requirements
- > Funding

### ■ Reuse Issues

- > Reuse priorities vs. cleanup schedules
- > EBS/CERFA
- > CERCLA 120(h)(3)/FOST



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### BCT Issues

BRAC Cleanup Teams are formed to enhance environmental decision making at BRAC installations. This team approach is intended to foster partnering, accelerate the environmental cleanup process, and expedite timely, cost-effective, and environmentally responsible disposal and reuse decisions while protecting human health and the environment. To accomplish these goals the teams will need to resolve base-specific issues as they arise, but there are a set of common issues that may be seen at most BRAC installations. These issues include:

- Conversion of existing programs to closure (DERP, compliance and permitting)
- Conduct of environmental baseline surveys and incorporating the results into installation environmental programs
- Schedules for reuse and disposal and the interaction with the environmental schedules
- Conduct of the uncontaminated property identification process under CERFA
- Review and comment on disposal documents and the required certification that all remedial actions necessary to protect human health and the environment have been taken

## Initial BRAC Cleanup Plan

- **Purpose—Review existing programs, determine status and develop strategy for completing environmental programs to allow property transfer**

- **Compile: List of current sites (identifiers)/areas of concern/compliance/related environmental factors status**
- **Consider: Possible/probable reuse scenarios (if known)**
- **Develop: Strategy for completing environmental programs**
- **Agree (among BCT members) on action items**
- **Prioritize action items**
- **Develop schedule, including major milestones**



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### Initial BRAC Cleanup Plan (BCP)

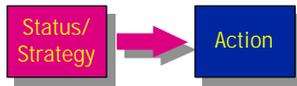
- The initial BCP will be prepared after formation of BRAC Cleanup Team (BCT)
- **BCT conducts initial “Bottom-up” program review**
  - BCT identifies status of all known cleanup, compliance, natural/cultural resources, and related environmental factors issues and projects
  - BCT tries to “find everything” (including historic identifiers, site aliases, site locations, documents, etc.)
  - BEC plans for document transfer and archives (administrative record)
  - BCT meets with LRA to determine status of redevelopment planning
  - BCT facilitates dialogue among various parties
  - BCT participates in Restoration Advisory Board to discuss cleanup issues
- **BCT compiles status summary for inclusion in BCP**
- **BCT develops strategies and action items for close-out of all sites and for resolving any other environmental concerns**
  - Initial BCP should contain schedules and requirements for meeting them
  - If redevelopment plan is not yet prepared (will likely not be at this time), BCT should focus on cleanup levels tied to existing land-use categories (as determined from base master plan or base comprehensive plan)

References: DoD Fast Track Cleanup at Closing Installations, DoD Guidance on Establishing BRAC Cleanup Teams, and the BRAC Cleanup Plan (BCP) Guidebook, Department of Defense, Fall 1993

## "Reuse Roadmap" Version of the BCP

### ■ A tool used by BCT to:

- > Agree on future land use (as identified in redevelopment plan) in order to focus cleanup efforts
- > Acknowledge reuse priorities
- > Agree on environmental risk
- > Reconcile reuse priorities with environmental risk
- > Develop comprehensive strategies and action plan for completion of all environmental activities
- > Agree on projects and schedules



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This version of the BRAC Cleanup Plan should summarize the following information:

### **Status**

- Status of all cleanup and other environmental issues addressed to date
- Status of community involvement activities
- Status of redevelopment planning efforts, including whether redevelopment plan has been submitted, whether disposal parcels have been proposed and whether transfer priorities have been established
- Identification of all environmental concerns (sorted by disposal parcel)

### **Strategy**

- Strategy for close-out of all contaminated sites (and impact on disposal)
- Strategy for close-out of all closure-related compliance issues (and impact on disposal) and transition of mission-related compliance programs, as applicable
- Strategy for transfer of any environmental permits, air credits, etc. (and impact on disposal)
- Strategy for completion of any required natural/cultural resources activities, if applicable (and impact on disposal)
- Strategy for resolving any other environmental concerns constraining property transfer (and impact on disposal)

### **Schedules/Projects**

- Projects and schedule(s) for completion of all environmental activities related to disposal (as agreed to by the BCT and based on strategies)

Reference: BRAC Cleanup Plan Guidebook

## CERCLA § 120 (h) (3)

***“... each deed entered into for the transfer of such property by the United States to any other person or entity shall contain ... a covenant warranting that—***

***(i) all remedial action necessary to protect human health and the environment ... has been taken before the date of transfer, and***

***(ii) any additional remedial action found to be necessary ... shall be conducted by the United States.”***



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### **CERCLA § 120(h)(3) (42 U.S.C. § 9620(h)(3)):**

#### **(3) Contents of certain deeds**

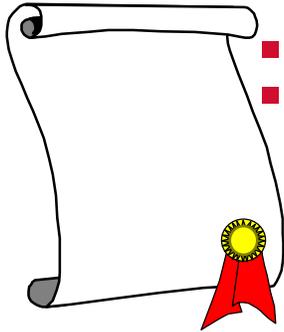
After the last day of the 6-month period beginning on the effective date of regulations under paragraph (2) of this subsection, in the case of any real property owned by the United States on which any hazardous substance was stored for one year or more, known to have been released, or disposed of, each deed entered into for the transfer of such property by the United States to any other person or entity shall contain—

- (A) to the extent such information is available on the basis of a complete search of agency files—
  - (i) a notice of the type and quantity of such hazardous substances,
  - (ii) notice of the time at which such storage, release, or disposal took place, and
  - (iii) a description of the remedial action taken, if any;
- (B) a covenant warranting that—
  - (i) all remedial action necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken before the date of such transfer, and
  - (ii) any additional remedial action found to be necessary after the date of such transfer shall be conducted by the United States; and
- (C) a clause granting the United States access to the property in any case in which remedial action or corrective action is found to be necessary after the date of such transfer.

For purposes of subparagraph (B)(i), all remedial action described in such subparagraph has been taken if the construction and installation of an approved remedial design has been completed, and the remedy has been demonstrated to the Administrator to be operating properly and successfully. The carrying out of long-term pumping and treating, or operation and maintenance, after the remedy has been demonstrated to the Administrator to be operating properly and successfully does not preclude the transfer of the property.

The requirements of subparagraph (B) shall not apply in any case in which the person or entity to whom the real property is transferred is a potentially responsible party with respect to such property. The requirements of subparagraph (B) shall not apply in any case in which the transfer of the property occurs or has occurred by means of a lease, without regard to whether the lessee has agreed to purchase the property or whether the duration of the lease is longer than 55 years. In the case of a lease entered into after September 30, 1995, with respect to real property located at an installation approved for closure or realignment under a base closure law, the agency leasing the property, in consultation with the Administrator, shall determine before leasing the property that the property is suitable for lease, that the uses contemplated for the lease are consistent with protection of human health and the environment, and that there are adequate assurances that the United States will take all remedial action referred to in subparagraph (B) that has not been taken on the date of the lease.

## Findings of Suitability to Transfer



- **Determination that property is environmentally suitable for transfer by deed under CERCLA §120(h)**
- **Based on an EBS**
- **DoD policy and objectives:**
  - > **Ensure protection of human health and environment**
  - > **Ensure transfer does not interfere with environmental response actions**
  - > **Ensure compliance with applicable environmental requirements**
  - > **Provide opportunity for public and regulatory participation**
  - > **Ensure sufficient review**



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In June 1994, DoD issued guidance on the environmental review process to reach a finding of suitability to transfer (FOST)

DoD's FOST guidance provides a framework for documenting the conclusion that real property made available through the BRAC process is environmentally suitable for transfer by deed under Section 120 of CERCLA. It sets forth specific requirements for notifying regulatory agencies and the public during the environmental review process. In addition, for property on which any hazardous substances have been stored for one year or more or are known to have been released or disposed of, Section 120(h) of CERCLA requires that notice of such storage, including the types and quantities of hazardous substances, be given both in deeds and in contracts for sale. Section 120(h) of CERCLA also requires that deeds contain certain covenants with respect to actions necessary to protect human health and the environment.

The time required to complete a FOST (that is, one that is approved and signed by the appropriate DoD Component) will vary, depending on the complexity of the environmental condition of the property to be transferred. Close coordination between the DoD Component and the regulatory agencies is essential to obtain consensus on the notification requirements and covenants for the FOST. If the property to be transferred had been identified by the DoD Component as uncontaminated under CERFA, and the appropriate regulatory agencies had concurred with the identification, much of the environmental review process for that property will have been done. However, all notifications of the regulatory agencies and the public describing the particular transfer continue to be a crucial part of the FOST process, and should not be neglected.

*Source: Fast Track to FOST, A Guide to Determining if Property is Environmentally Suitable for Transfer, Interim Final, February 1995*

## Air Force FOST Procedure

- ① **Notify regulators of intent to initiate**
- ② **Conduct VSI; prepare working draft FOST/EBS**
- ③ **Notify regulators/public of intent to sign FOST**
- ④ **Address comments; prepare draft final FOST/EBS**
- ⑤ **Forward to regulators (minimum 3 working days)**
- ⑥ **Final AFBCA coordination**
- ⑦ **Transfer property**
- ⑧ **Notify public**
- ⑨ **Retain EBS/FOST and comments**
- ⑩ **Make EBS/FOST available to regulators and public**



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*Source: Air Force Base Conversion Agency Procedures for Processing Findings of Suitability to Lease and Findings of Suitability to Transfer (FOSL/FOST) and Supporting Documents, June 8, 1995*