United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

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Memorandum

To: Heads of Bureaus and Offices

From: for Willie R. Taylor, Director
Office of Environmental Policy and Compliance

Mary Josie Blanchard

Subject: Fiscal Year 2006 Departmental Summary Report on Bureau Environmental Auditing Programs and Activities

The Department of the Interior's (DOI) mission is complex, multi-faceted, and challenging. We provide recreation opportunities, access to resources and protect some of the Nation's most significant cultural, historic, and natural places. We serve communities and fulfill our trust and other responsibilities to American Indians, Alaska Natives, and the Nation's affiliated island communities. As the Nation's premier conservation agency, our responsibility to leave a legacy of healthy lands and waters, thriving communities, and dynamic economies depends upon our compliance with environmental laws and regulations. We accomplish this with the help of our 80,000 employees, 180,000 volunteers, and thousands of partners. Behind all of the DOI's programs rests a management foundation that is vital to the accomplishment of our mission.

The DOI continues to support the President's Management Agenda that builds on a foundation for management excellence. As part of the President's Management Agenda, the President's Management Council directed all Federal agencies to improve their overall environmental compliance and performance through implementation of environmental management systems (EMS). Environmental auditing was specifically targeted for management improvement of the Department's environmental compliance and performance. Since environmental compliance serves as the foundation for a successful EMS program, environmental auditing was incorporated into all Bureaus' EMS efforts. As part of DOI's continuing support of the President's management agenda, beginning in Fiscal Year (FY) 2007, Bureaus will be required to report on their progress status for green purchasing and electronic stewardship as part of their EMS and auditing programs.

For FY 2006, the Bureaus reported a total of 3,133 facilities, with a total of 578 environmental audits completed and a total of 6,613 environmental audit findings as shown in Table 1 in the attachment. (An environmental audit finding is a statement of conditions identified at the time the environmental audit is performed requiring a response in accordance with environmental audit protocols and applicable legal requirements). A total of 2,228 environmental audit findings were corrected in FY 2006 and a cumulative total of 4,334 environmental audits have been completed to date (all-years).

The Office of Environmental Policy and Compliance examined trends in the high risk environmental audit issues reported by Bureaus between FY 2000 through 2005. A comparison of the number of environmental audit findings corrected and the total number of audit findings for FY 2004 through 2005 (when this data was available) is shown in Figure 1 in the attachment. Root causes of high risk environmental audit issues impacting DOI leadership for FY 2000 through 2005 is shown in Figure 2 in the attachment. The analysis revealed four root causes: (1) lack of employee training, (2) insufficient resources for environmental compliance, (3) insufficient management/leadership support, and (4) non-compliance with environmental requirements. The same high risk audit issues were identified by bureaus in FY 2006, indicating that they continue to remain problematic.

The DOI is fully committed to reduce adverse environmental impacts to public lands and natural resources and to enhance compliance. Thus, we believe Assistant Secretaries and Heads of Bureaus and Offices will want to take the following actions: (1) ensure commitment of their managers to environmental compliance, (2) ensure commitment to necessary resources to correct non-compliance issues, and (3) provide environmental compliance training for staff across all Bureaus and Offices.

Finally, environmental auditing is currently tracked as part of the DOI Organizational Assessment toward management excellence. Our role as the Nation's premier conservation agency requires that we exercise leadership across DOI to ensure overall compliance with regulatory requirements.

If you have any questions, please contact Willie R. Taylor, Director, Office of Environmental Policy and Compliance, at (202) 208-3891.

Attachment

cc: Assistant Secretary – PMB
Chief of Staff
Solicitor
Assistant Secretaries
Deputy Assistant Secretary – P&IA
REOs
HazMat Contacts

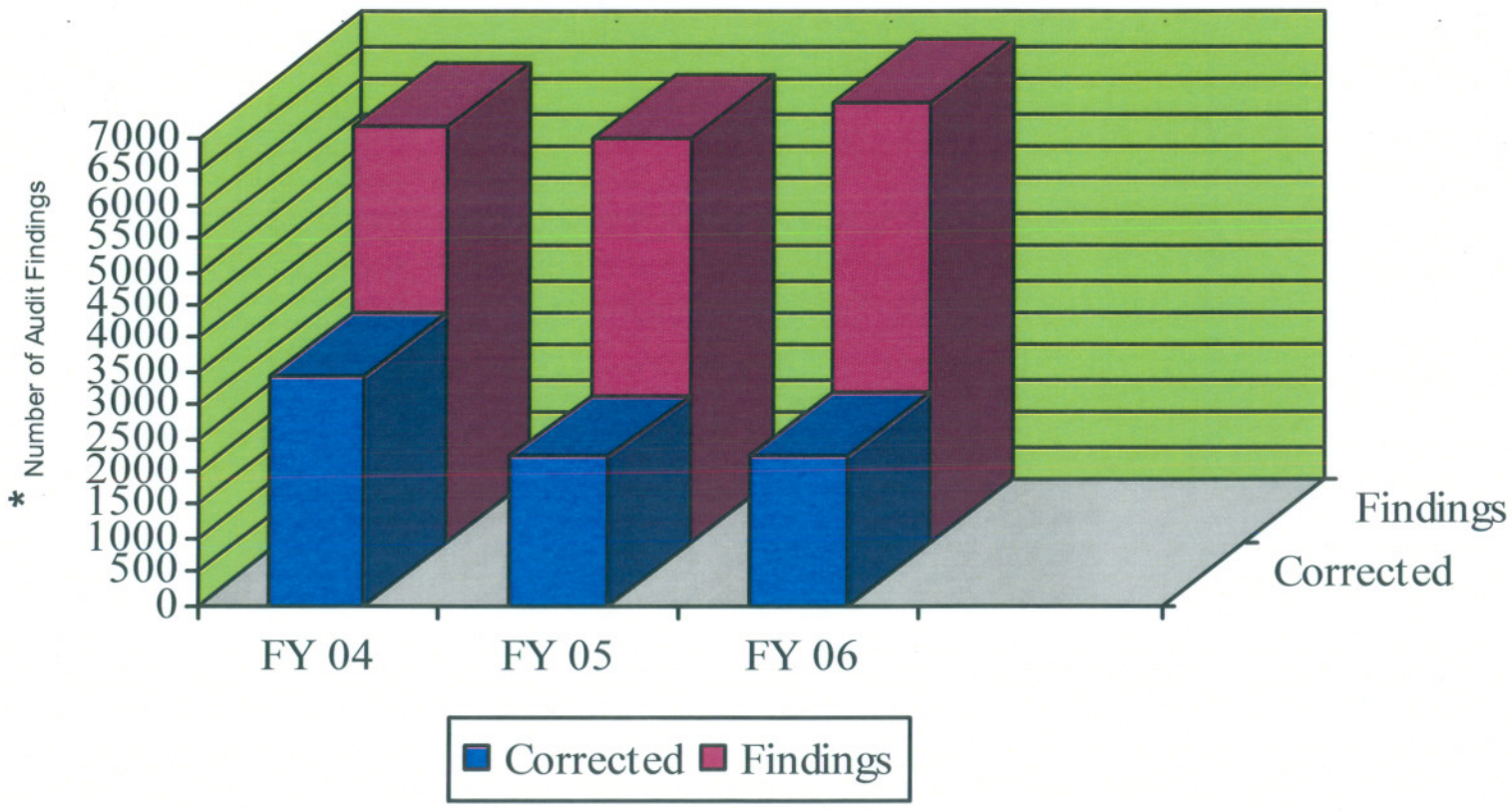
ATTACHMENT

Table 1: Bureau Summary of Environmental Auditing Programs and Activities for Fiscal Year 2006

Bureau	Number of Audited Facilities in FY 2006	Number of Environmental Audits Performed in FY 2006	Number of Environmental Audit Findings Reported in FY 2006	Number of Findings per Audit (normalized)	Number of Environmental Audit Findings Corrected in FY 2006	Number of Environmental Audit Findings Corrected in FY 2005	Cumulative Audits Performed (all-years)
BIA	63	15	1,446	96.4 (1,446/15=96.4)	#	#	302
BLM*	120	29	1,105	38.2 (1,105/29= 38.2)	1,505	1,254	315
BOR	413	60	141	2.35 (141/60 = 2.3)	110	108	383
FWS	867	217	782	3.6 (782/217= 3.6)	360	435	1,878
MMS**	-	-	-	-	-	-	-
NBC**	2	-	-	-	-	-	-
NPS***	388	87	2,158	24.8 (2,158/87=24.8)	69	313	562
NPS Concessions (NPS-C)+	580	39	784	20.1 (784/39=20.1)	27	35	191
OSM**	-	-	-	-	-	-	-
USGS++	700	131	197	1.5 (197/131 = 1.5)	157	72	703
DOI Total	3,133	578	6,613	11.4 (6,613/578=11.4)	2,228	2,217	4,334

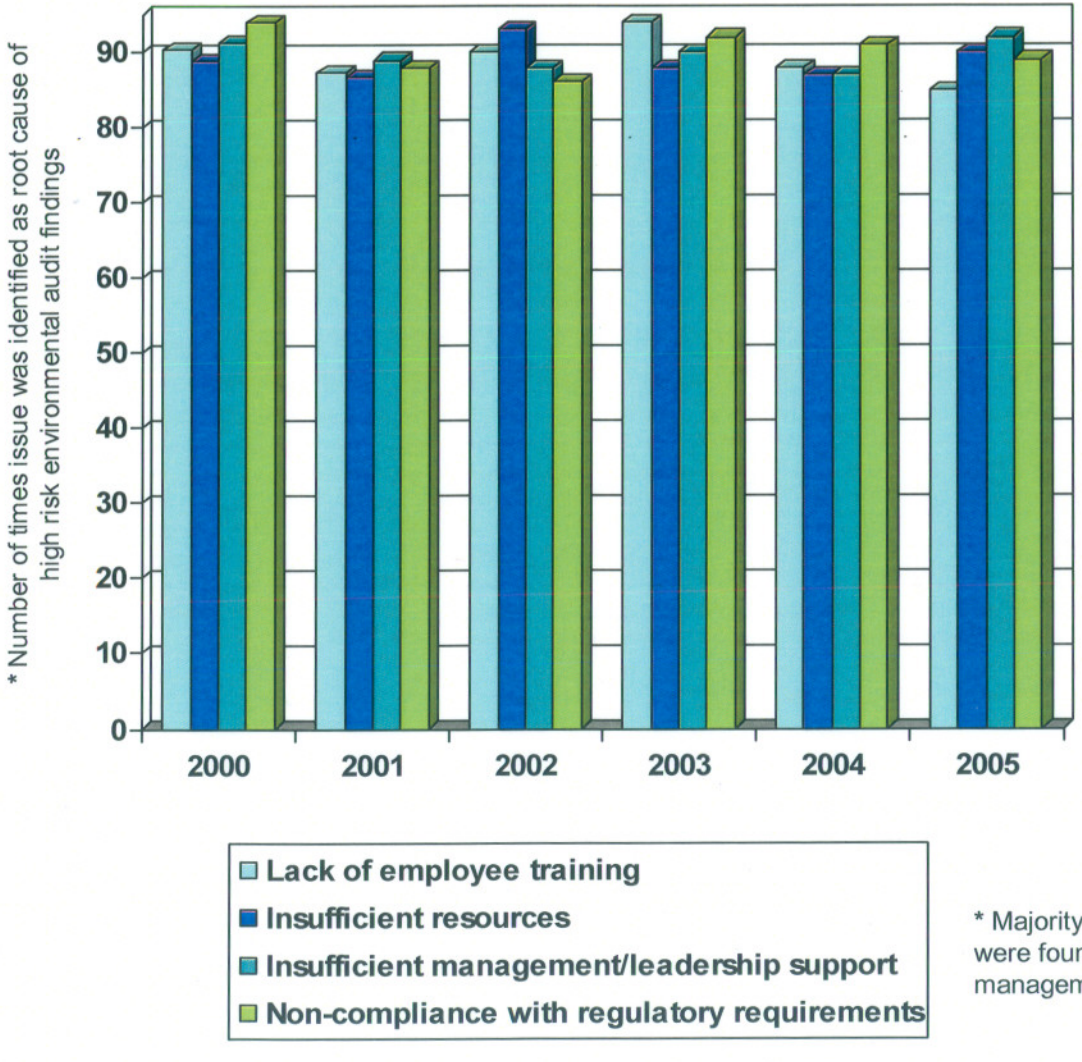
Notes:
1. #BIA has not sufficiently developed their database system to capture information on corrected audit findings.
2. *BLM uses the term "organizational units" and not facilities. FY 2006 audits from 10/1/05 through 9/30/06. FY 2005 audits from 10/1/04 through 9/30/05.
3. **MMS, NBC, and OSM occupy primarily GSA-leased space. NBC: Main Interior and South Interior Buildings under delegated GSA authority for DOI to operate.
4. ***NPS: Some audits were begun in FY 2006 but will not be finalized until FY 2007.
5. + NPS Concessions: Based on 580 facilities in 121 parks. Only third party concessioners are reported.
6. ++USGS: Inclusive of FY 2005 carryover audits.

Figure 1. Total Number of DOI Audit Findings vs. Total Number of Audit Findings Corrected for Fiscal Years 2004 - 2006



* Audit findings may not correspond to the year finding was identified.

Figure 2: Root Causes of High Risk
Environmental Auditing Issues
Impacting Departmental Leadership for FY 2000 - FY 2005



Recommendations

- Ensure commitment by DOI managers to environmental compliance.
- Ensure commitment of necessary resources to correct non-compliance issues.
- Provide environmental compliance training across all Bureaus and Offices.

* Majority of high risk environmental, safety, and health findings were found in spill control, drinking water systems, waste management, and hazard communication.