APOSTLE ISLANDS NATIONAL LAKESHORE INTEGRATED ENVIRONMENTAL PLAN PROCEDURES

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Apostle Islands Integrated Environmental Plan

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1.0 INTRODUCTION

The purpose of this Integrated Environmental Plan (IEP) is to harmonize and integrate several initiatives underway at Apostle Islands National Lakeshore (APIS) that have the common aim of improving the APIS's environmental performance. Specifically, this IEP incorporates the following previously separate programs:

- Environmental Management System (EMS) requirements under Executive Order (EO) 13423, EO 13514, and encompassed in the National Park Service (NPS) Model EMS;
- Environmental management compliance[1];
- Sustainable practices required as part of fulfilling goals outlined in EO 13423, EO 13514, and associated Department of Interior (DOI) and NPS sustainability data management and reporting requirements; and
- Goals to reduce greenhouse gas emissions adopted by APIS as an NPS-recognized Climate Friendly Park.

The purpose behind integrating these initiatives and programs under one common management system is to reduce duplication of effort (as there were many overlapping commitments among the programs); ensure that efforts are coordinated and not conflicting with one another, and to identify opportunities for maximum impact across the related areas of environmental management compliance, sustainability, and climate change. The IEP will allow park staff to focus their limited resources to achieve the greatest amount of progress for their efforts to improve APIS's environmental performance.

2.0 ENVIRONMENTAL COMMITMENT STATEMENT

The Environmental Commitment Statement (ECS) demonstrates APIS's commitment to exemplary environmental management. It guides the overall environmental management efforts encompassing environmental management compliance, pollution prevention, and sustainability initiatives, and offers a framework for continuous improvement. The ECS is specific to Apostle Islands National Lakeshore and also accounts for priorities and goals of the broader local community as well as NPS Region-level and Servicewide goals.

At APIS, parkwide policy framework is established through superintendent's orders (SOs) in accordance with SO#1. As the ECS is an expression of policy related to environmental management and sustainability issues at APIS, it has been embodied in SO#31, "Safety, Environmental Management, and Sustainability."

2.1 PROCEDURE

The ECS/SO#31 ECS/SO#31 is developed and maintained by the Superintendent with input from APIS Safety, Environmental Management, and Sustainability (SEMS)

[1] For purposes of the APIS IEP, Environmental Management Compliance includes activities to comply with and fulfill the intent of U.S. Environmental Protection Agency (EPA) laws and regulations, and applicable delegated and additional related State of Wisconsin and local laws and regulations. However, activities related to compliance with the National Environmental Policy Act (NEPA) are not included within the scope of the IEP because these are carried out through a separate park program.

Committee. The ECS/SO#31 is maintained to be consistent with the NPS EMS Model and incorporates additional guiding principles ascribed to by park management such as The Natural Step Framework, a set of sustainability principles based on the laws of thermodynamics and the natural cycles (www.naturalstep.org). The ECS/SO#31 may be communicated to park staff through one or more of the following methods: Squad meeting announcements and subsequent transmittal by Division Chiefs, an annual all-staff email, and/or updates to the park Intranet site. (See Section 7.0, Communication, for details on how the ECS/SO#31 is communicated to additional internal and external audiences.)

2.2 RESPONSIBILITIES

The Superintendent holds primary responsibility for the ECS/SO#31 because it is regarded as a key policy statement that has significant exposure external to APIS and is therefore a dimension of community relations. The ECS/SO#31 will be reviewed and updated annually by the Superintendent with input from the SEMS Committee. The latest version is deemed official by signature of the Superintendent.

2.3 LINK TO ENVIRONMENTAL COMMITMENT STATEMENT

The ECS/SO#31 is maintained as a Word and PDF document in the IEP folder on the APIS share drive.

3.0 FACILITY ACTIVITIES AND ENVIRONMENTAL IMPACTS

This element of the IEP accounts for the ways in which APIS activities and operations impact the environment. It provides a framework for identifying significant environmental impacts so that IEP functions can be focused directly toward reducing or eliminating them. In addition, by clearly understanding how park activities and operations impact the environment, it is easier to envision what APIS might look like if such impacts could be fully mitigated through sustained efforts over a long period of time. These ideals are described in the IEP as “future visions.” In defining future visions for categories of significant impacts, park staff can better understand whether near term actions are leading towards or away from the long term desired state. In essence, the future visions together create a constellation of stars that park staff can steer the IEP by during any given year.

Park staff are committed to ensuring compliance with environmental regulations and environmental standards and policies of NPS, DOI, the Office of the Federal Environmental Executive, and the Environmental Protection Agency (EPA), as well as local and State of Wisconsin jurisdictions (e.g., Department of Natural Resources) that are applicable to APIS. Activities and operations that fall under the authority of such regulations are managed through environmental management compliance programs (e.g., hazardous and universal waste management, wastewater management, storm water management) that function to control or prevent impacts as well as comply with regulations. To manage environmental management compliance programs, it necessary for park staff to be aware of all of the applicable legal and other requirements that pertain to APIS activities and operations.

3.1 PROCEDURE

To understand Facility Activities and Environmental Impacts, park staff have developed a framework of categories of environmental performance within which to organize activities and associated impacts. The categories considered include:

- Ecological Integrity
- Energy
- Hazardous Materials and Spills
- Procurement
- Transportation
- Waste
- Water

Within each category, NPS staff identified park activities and operations and associated significant negative and positive impacts upon that dimension of environmental performance. They also defined and identified the future vision toward which the IEP should be leading if it is functioning optimally. While the IEP at any point in time focuses on a particular annual cycle of activity, identifying the future vision allows park staff to ensure that their actions during any given year are on a trajectory to reach their ideal state over the long term (taken to be several years out). As a final step, park staff also identified key metrics that they will use to measure progress towards or away from each future vision.

To ensure environmental management compliance obligations are taken into account, an inventory of laws, regulations, and standards applicable to park operations and activities is maintained as part of the IEP. This is reviewed annually to take into account changes in laws, regulations, or policies applicable to APIS.

3.2 RESPONSIBILITIES

The Environmental Management and Sustainability (EMS) Sub-committee (a sub-committee of the SEMS Committee, as described in Section 5.0), also referred to as the Green Team, has primary responsibility for developing the Impacts and Future Visions Workbook with input from the SEMS Committee. Once future visions are established, the Green Team will also define key metrics for measuring progress toward future visions as described in Section 9.0. This matrix will be reviewed, refined, and updated annually. The annual review will include a review of activities and impacts to account for new or changed activities, and an evaluation of whether park actions during the previous year have resulted in progress toward attaining each future vision. No less than every five years, the Green Team, with input from the SEMS Committee, will re-evaluate future visions and key metrics in light of updated ecological and environmental data, changes in conditions of park or regional natural resources, and need to align with park mission as expressed in the General Management Plan and other park policy documents.

The Facility Manager has primary responsibility for maintaining the Legal and Other Requirements Workbook that includes applicable laws, regulations, and standards; reviewing and updating it annually (or more frequently if regulatory changes or new

regulations come to the attention of park staff). The Green Team will review the matrix and take it into account when annually updating goals, objectives, and targets.

3.3 LINK TO IMPACTS AND FUTURE VISIONS

The IMPACTS and FUTURE VISIONS is maintained as a stand-alone Excel workbook in the IEP folder on the APIS share drive.

3.4 LINK TO LEGAL AND OTHER REQUIREMENTS

The REQUIREMENTS is maintained as a stand-alone Excel workbook in the IEP folder on the APIS share drive.

4.0 GOALS, OBJECTIVES, AND TARGETS

Goals and objectives are the engine that drives the IEP forward on a year-by-year basis. They are focused upon the significant impacts identified in Section 3.0, as well as Superintendent's standards, NPS Midwest Region goals, and NPS goals relating to environmental performance. This focus allows park staff to focus their resources on what is most important during any given annual cycle. Over a longer term, goals and objectives are related to the future visions (also described in Section 3.0) in that they demonstrate whether progress over time is on a trajectory to attain the associated future vision. To this end, objectives may focus on determining or maintaining key metrics (described in Section 9.0) for evaluating progress toward future visions.

There are several sources that Green Team members consider when determining annual goals, objectives, and targets:

- Impacts and Future Visions Workbook IMPACTS and FUTURE VISIONS
  Goals, objectives, and targets are, first and foremost, directed at reducing significant environmental impacts and, over a period of years, moving the park towards attainment of future visions.

- Environmental Stewardship Matrix ENVIRONMENTAL STEWARDSHIP MATRIX
  To keep track of all the environmental practices that APIS embraces, its previous environmental accomplishments, and ideas and initiatives for future consideration, an Environmental Stewardship Matrix was created. It documents three categories of information:
  - Sustainability BMPs – On-the-ground practices that are integrated into APIS day-to-day activities that go beyond environmental management compliance that have been formally adopted by park staff as actions they will take wherever feasible in support of the sustainability commitments described in the ECS/SO#31 ECS/SO#31;
  - Voluntary efforts and ideas for future environmental initiatives; and
  - Achievements (e.g., retired/accomplished goals, objectives, and targets).

  Goals, objectives, and targets may elevate and make actionable ideas, practices, or initiatives stored in the Environmental Stewardship Matrix that are in the early stages of development or have not yet been developed and formalized. The Environmental Stewardship Matrix also documents and accounts for the park's participation in well

established and existing programs such as Climate Friendly Parks or Travel Green Wisconsin.

- EO 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* (January 27, 2007) – Goals, objectives, and targets may support fulfillment of EO environmental management and sustainability goals required of all federal agencies. EO 13423 includes goals in the areas of energy efficiency and reduction in greenhouse gas emissions, sustainable acquisition, use of renewable energy, reduction of the use and disposal of toxic and hazardous chemicals and materials, pollution and waste prevention/diversion and recycling programs, use of renewable energy, high performance and sustainable buildings, electronics stewardship, fleet management, and water conservation.

- EO 13514, *Federal Leadership in Environmental, Energy, and Economic Performance* (October 5, 2009) – EO 31514 builds upon the existing environmental management and sustainability requirements of EO 13423 by updating its goals in several areas, and adding requirements for greenhouse gas emissions, water use, storm water management, transportation, and others.

- Superintendent's Performance Standards, established by the NPS Midwest Region Director related to environmental performance, sustainable practices, and EMS.

Consistent with its Environmental Commitment Statement (SO#31) ECS/SO#31, APIS commits to all reasonable efforts to implement sustainable practices in planning, operations, management decisions, and policy development at the Apostle Islands National Lakeshore, consistent with EO 13423 and EO 13514. These commitments are realized each year through the setting and achievement of goals, objectives, and targets as part of the environmental planning process guided by its IEP.

4.1 PROCEDURE

Park environmental goals fulfill one or more of the following purposes as expressed in the ECS/SO#31:

- Reduce or prevent significant environmental impacts from park activities and operations;
- Comply with environmental laws, regulations, and other requirements;
- Support the goals of EO 13423, EO 13514, and the Apostle Islands National Lakeshore Climate Friendly Parks Action Plan; and
- Strive to attain future visions of environmental performance and sustainable operations.

To focus goals and objectives by understanding environmental management compliance obligations, the Green Team reviews the Legal and Other Requirements Workbook and the latest environmental audit findings to identify areas where park staff are not certain that park operations and activities are in full compliance. The Green Team also refers to the Environmental Stewardship Matrix to refresh themselves on ideas for new environmental initiatives that have been proposed in the past.

For each objective, one or more appropriate targets (metrics) is developed for determining progress, steps to achieve each objective, who is responsible, and a timeline for completion.

Once adopted or updated, progress towards meeting objectives and are reviewed quarterly by the SEMS Committee, usually in March, June, September, and January. Status is communicated to the Superintendent, APIS management team, and other appropriate parties through transmittal of meeting minutes. Goals and objectives are reviewed annually during the period from December 1 through February 1. Progress on the past year's goals and objectives is documented and evaluated, and they are retired or updated accordingly. Accomplished objectives and targets are recorded in the Environmental Stewardship Matrix. New goals and objectives may also be adopted as appropriate to keep APIS moving forward in fulfilling its environmental commitments and future visions.

4.2 RESPONSIBILITIES

The Green Team has primary responsibility for developing and maintaining goals, objectives, and targets that are tied concretely to APIS's significant impacts. The SEMS Committee reviews and approves the final goals, objectives, and targets for each year. For each goal, a person (Goal Leader) will be assigned to oversee steps to achieve the associated objectives and targets to fulfill the goal. Additional staff may be assigned to carry out specific tasks associated with each objective as described in Section 5.0.

4.3 LINK TO GOALS, OBJECTIVES, AND TARGET METRICS

The matrix of goals, objectives, and targets is maintained as a worksheet in the 4. GOALS, OBJECTIVES & PROGRESS IEP Management Workbook (Excel spreadsheet) in the IEP folder on the APIS share drive.

4.4 LINK TO ENVIRONMENTAL STEWARDSHIP MATRIX

The matrix of environmental practices, accomplishments, and future ideas and initiatives are maintained in the ENVIRONMENTAL STEWARDSHIP MATRIX (Excel spreadsheet) in the IEP folder on the APIS share drive.

5.0 ROLES, RESPONSIBILITIES AND ACCOUNTABILITY

One of the most valuable attributes of the IEP is that it clearly outline roles and responsibilities for environmental management and sustainability goals. This fosters a team approach to environmental management, allows an equitable allocation of responsibilities among staff, and ensures that park staff understand their part in overall park environmental management. The SEMS Committee has overall responsibility for oversight of the IEP. This includes identifying environmental roles and responsibilities necessary to carry out the IEP in keeping with the ECS/SO#31.

5.1 PROCEDURE

The Green Team reviews and recommends updates to IEP roles and responsibilities annually to the SEMS Committee. The SEMS Committee reviews and approves recommended updates to roles and responsibilities. The SEMS Committee will function to provide continual evaluation and oversight of the park's safety, environmental management, and sustainability efforts to make recommendations for improvement, and to increase safety and sustainability awareness of employees. Specifically, the SEMS Committee will:

- Provide oversight and guidance to park staff in carrying out the provisions of the IEP.
- Review all accidents, near misses, and investigations (environmental and safety).
- Disseminate "lessons learned" to all employees (environmental and safety).
- Be responsible for a Job Hazard Analysis (JHA) program, and for incorporating environmental operational controls into JHAs.
- Coordinate park sustainability efforts within the framework of the IEP.
- Establish quantifiable targets for safety and environmental performance as well as monitor and report how well APIS is doing. (Examples include lost time injury rate, number of days since an accident/ environmental incident, and goals, objectives, and targets established through the IEP).
- Maintain the park's intranet site devoted to safety, environmental management, and sustainability.
- Review and approve Sustainability BMPs for the park and post them on the intranet.
- Recommend parkwide training and awareness functions for safety, environmental management, and sustainability.
- Establish and meet its own deadlines for accomplishing these activities, subject to directives from other levels of the NPS.
- Encourage a culture where exemplary performance on safety, environmental management, and sustainability are valued, expected, and rewarded.

Since leadership commitment is essential to success, membership on the SEMS Committee will start with the Superintendent, who will serve as the Chair, and all park Division Chiefs. The Safety Officer will also be a permanent member of the SEMS Committee. In addition, Chairs of the following subcommittees will be members of the SEMS Committee, serving for renewable two year terms. The intent is to ensure the diversity of park operations are represented.

Subcommittee	2003-2006 Chair	2007-2008 Chair	2009-2010 Chair
Marine Safety	Supervisor, Marine and Grounds	Supervisor, Marine and Grounds	Supervisor, Marine and Grounds
Safety Information	Biologist	IT Specialist	[eliminated]

Subcommittee	2003-2006 Chair	2007-2008 Chair	2009-2010 Chair
Environmental Management and Sustainability (EMS) aka Green Team	n/a	Biologist	IT Specialist
Backcountry Management [liaison][2]	n/a	Park Ranger, Cultural Educator	Park Ranger (LE), West Area Ranger

Subcommittee members will be appointed by the Superintendent upon recommendation of the SEMS Committee, but are not members of the SEMS Committee themselves. However, subcommittee members and all other park employees will always be welcome at meetings. The Superintendent, upon advice of the SEMS Committee, may establish ad hoc subcommittees as needed. Also, the SEMS Committee, with approval of the Superintendent, may delegate roles and responsibilities assigned in the IEP to the Environmental Management and Sustainability Subcommittee. Such delegation will be documented during the annual review of IEP roles and responsibilities.

Meetings will normally be held every other month, on a schedule determined by the committee. Note-taking will be rotated amongst all members of the committee except the Superintendent, using a simplified format determined by the committee. Draft notes will be sent to the Superintendent for review and approval and then distributed to all park employees and the regional Safety Officer and the regional Environmental Engineer as quickly as possible after each meeting. The park Safety Officer will be responsible for sending out reminders of meetings and pending assignments as necessary.

Roles and responsibilities associated with the IEP are organized into three categories:

- Those associated with maintenance and administration of the IEP;
- Those associated with carrying out goals and objectives; and
- Those associated with environmental management compliance responsibilities.

The IEP also identifies responsibilities of contractors (as required by EO 13423), partner organizations, and where appropriate, volunteers.

5.2 RESPONSIBILITIES FOR IEP MANAGEMENT

<u>SEMS Committee</u> –

- Will review and approve the environmental management and sustainability roles and responsibilities as identified in the IEP. Appointments include, but may not be limited to:
    - Green Team Chair
    - IEP record keeper
    - IEP training coordinator

[2] The Backcountry Management Team (BMT) is an independent committee whose purpose and function is outlined in Superintendent's Order #28. The chair of the BMT will be a member of the Safety & Sustainability Committee, providing a liaison function between the two groups.

- Will develop recommended "template language" for environmental and sustainability responsibilities for Division Chiefs.

Superintendent –

- Will review and approve the environmental management and sustainability roles and responsibilities as identified in the updated IEP.
- Will review, revise, and establish, with advice from the SEMS, "template language" for the environmental management and sustainability responsibilities for Division Chiefs, which will be used, as is, or made more specific, for use in employee annual performance plans.
- Will determine who will be responsible for communicating IEP roles and responsibilities for partner organizations and volunteers.

Superintendent and Division Chiefs– Will identify, using a collaborative process, environmental management and sustainability responsibilities within the span of each Division.

Supervisors

- Will ensure that staff are aware of their IEP roles and responsibilities.
- Cascading from the Superintendent through Division Chiefs to first line supervisors, will establish and incorporate performance measures for IEP roles and responsibilities as appropriate, or environmental management and sustainability responsibilities in general, into the annual performance plan and evaluation of each applicable employee.

5.3 RESPONSIBILITIES FOR IEP GOALS AND OBJECTIVES

SEMS Committee – The SEMS Committee reviews updated goals and objectives and recommends Goal Leaders and supporting staff to be responsible for ensuring that they are carried out.

Superintendent – Will review and refine recommendations of the SEMS committee and, in a collaborative process with the Division Chiefs, will establish Goal Leaders and supporting staff to carry out the annual goals and objectives.

Superintendent and Division Chiefs – Division Chiefs will incorporate the objectives, as appropriate, into their annual work plans, as well as Employee Performance Appraisal Plans (EPAPs) as well.

Goal Leaders

- Will ensure that staff are aware of their roles and responsibilities to achieve the objectives and targets supporting their goal.
- Will report progress to the SEMS Committee as specified in the IEP Annual Calendar.
- Will provide a year-end summary of efforts to accomplish the objectives and targets supporting the goal to the SEMS Committee.

5.4 RESPONSIBILITIES FOR ENVIRONMENTAL MANAGEMENT COMPLIANCE AND SUSTAINABILITY

SEMS Committee –

- The SEMS Committee reviews and recommends updates to environmental management compliance and sustainability roles and responsibilities. Recommendations will include whether responsibility should be a formal collateral duty or a rotating committee assignment. Typical responsibilities considered may include but may not be limited to:
    - Greenhouse Gas Emissions Inventory and Monitoring action plan coordinator
    - Emergency coordinator
    - Energy management coordinator
    - Environmental purchasing coordinator
    - Hazardous waste coordinator
    - Integrated pest management coordinator
    - Waste reduction/recycling coordinator
    - Spill Prevention, Control, and Countermeasures Coordinator

Superintendent –

- Will review, refine, and approve the environmental compliance management and sustainability roles and responsibilities and determine the type of assignment it will be (collateral duty, rotating committee appointment, or other).

Superintendent and Division Chiefs – Using a collaborative process, will establish and assign environmental compliance management and sustainability responsibilities within the span of each Division.

Supervisors

- Will ensure that staff are aware of their environmental compliance management and sustainability responsibilities.
- Cascading from the Superintendent through Division Chiefs to first line supervisors, will establish and incorporate performance measures for environmental compliance management and compliance responsibilities as appropriate, into the annual performance plan and evaluation of each applicable employee.

Contracting Officer's Technical Representatives (COTRs) and Agreements Technical Representatives (ATRs) – Will, with input from the SEMS Committee, ensure that environmental responsibilities consistent with the IEP are incorporated into contract or agreement language.

5.5 LINK TO ROLES AND RESPONSIBILITIES

There are three matrices used to describe roles and responsibilities in the IEP Management Workbook (Excel spreadsheet):

- The matrix of Responsibilities for IEP Goals 5A. RESPONSIBILITIES–GOALS identifies Goal Leaders as well as staff who are responsible for each objective;
- The matrix of Responsibilities for IEP 5B. RESPONSIBILITIES–IEP MANAGEMENT describes general responsibilities for maintaining and updating the APIS IEP (e.g., IEP Record Keeper); and
- The matrix of Responsibilities for Environmental Management Compliance and Sustainability 5C. RESPONSIBILITIES–ENVIRONMENTAL COMPLIANCE identifies individuals responsible for oversight of specific areas of environmental management compliance (e.g., Emergency Coordinator).

6.0 DOCUMENT CONTROL, RECORDKEEPING AND REPORTING

Documents and records provide continuity to environmental management and provide evidence that tasks are being carried out in accordance with environmental regulations and standards applicable to APIS. In addition, park staff are required to participate in reporting related to environmental matters such as quarterly DOI sustainability reporting, annual self-reporting on the Office of Management and Budget (OMB) EMS Scorecard, and required environmental reports such as annual Toxic Release Inventory reporting for lead releases. This part of the IEP identifies all APIS's reporting obligations and ensures that reporting requirements are completed.

6.1 PROCEDURE

The following definitions will help staff with understanding and following this procedure:

- **Documents** – These include policies (e.g., ECS/SO#31), plans (e.g., Spill Prevention, Control, and Countermeasures (SPCC) Plan, Hazard Communication or HAZCOM Plan), and sustainability BMPs associated with environmental management. These are maintained by APIS staff and management to prescribe and guide environmental management programs, tasks, and activities and are periodically reviewed and updated accordingly.
- **Records** – These are notations, completed checklists, shipping documents, receipts of recycling or disposal, or other information that provides concrete evidence that tasks, activities, and regulatory obligations are being carried out as specified in the IEP. Records are not changed once they are created.
- **Reports** – Reports are a form of a record that are tracked on their own matrix. These include both regularly occurring internal reports that the park uses to monitor environmental performance, required reports to regulatory agencies (e.g., chemical inventory reporting required under the Emergency Planning and Community Right-to-Know Act), and other external reports relating to environmental management (e.g., NPS fuel use reporting and DOI sustainability/environmental management reporting through FedCenter).

Documents, records, and reports associated with the IEP are maintained in distinct spreadsheet tabs. This specifies where each item is located or can be viewed; who is responsible for it; and how often it is reviewed, updated, or recorded. The spreadsheet tabs are further organized into two categories: Those that support the function and administration of the IEP and those required to demonstrate environmental management compliance (e.g., hazardous waste manifests). In addition, in the documents tab, sustainability BMPs are identified. Documentation associated with monitoring key metrics and progress on IEP goals and objectives is covered in Section 9.0, Operational Controls and Monitoring.

6.2 DOCUMENT CONTROL

All documents associated with the IEP will bear an issue date and a revision date (if applicable) so park staff can be certain they are dealing with the most current version of the document. Records and reports will bear the date on which information was recorded or reported, and, where appropriate, initials to indicate who recorded or reported the

information. The ECS/SO#31 is maintained as a Superintendent's Order, and follows document control procedures for park SOs. Outdated IEP documentation and records exceeding five years old will be archived or destroyed in accordance with APIS record retention policies.

6.3 RESPONSIBILITIES

The Green Team will identify documents, records, and reports integral to environmental management at APIS. Green Team members will also recommend assignments of responsibility for individual documents, records, and reports, subject to approval of the Superintendent. An overall IEP record keeper will also be assigned in accordance with Section 5.0 to maintain and update the Matrix of Documents, Records, and Reports and provide standards and guidance to staff who are responsible for individual documents, records, or reports.

6.3 LINKS TO IEP DOCUMENTS, RECORDS, AND REPORTS

There are three matrices used to describe roles and responsibilities in the IEP Management Workbook (Excel spreadsheet):

- The matrix of Documents 6A. DOCUMENTS;
- The matrix of Records 6B. RECORDS & REPORTS; and
- The matrix of Reports.

7.0 COMMUNICATION

As described in the ECS/SO#31, the integrity of the environment of Apostle Islands National Lakeshore is integral to APIS's identity. It follows that park management would want to actively communicate actions that park staff take to minimize their impacts, comply with environmental regulations, and adopt and maintain sustainable operations. To accomplish this, a web portal is maintained that allows park staff as well as outside stakeholders including visitors and the general public to access and understand IEP components, obtain data regarding APIS's environmental performance, and to review APIS's accomplishments.

7.1 PROCEDURE

The IEP will be communicated at least annually and as needed through a combination of the following methods:

- Seasonal training (employees and volunteers)
- Park SEMS intranet site (employees and volunteers)
- All employee email (employees)
- Internet (for public information)
- MWRO Intranet or Share Point site (NPS)
- Contract specifications (for contractors)
- Pre-construction meeting (for contractors)
- Special Use Permit language (for permittees)]
- Presentations and information provided to public forums such as the Green Team Network and Travel Green Wisconsin (public)

- Presentations to the General Services Administration and owners from which park leases property and facilities (landlords)
- Presentations at regional and national conferences (public)
- Information disseminated through the NPS and Northern Great Lakes Visitor Centers (public)

External communications concerning the IEP will be mediated by the Superintendent. All formal communications will be copied to or forwarded to the IEP Record Keeper for tracking purposes.

7.2 RESPONSIBILITIES

The Superintendent, with input from the SEMS Committee, has overall responsibility for oversight of the external communication strategy and determining how the IEP is communicated to each audience. The Superintendent decides what information will be made available to the public and what information will be communicated to NPS staff alone. An IEP Internal Communications Leader will also be designated to facilitate understanding of the IEP among park staff and to provide annual training on the IEP.

An environmental web portal associated with the APIS web site will provide a primary avenue for public interface with the IEP. The IEP Webmaster (park IT Specialist) is responsible for developing and maintaining APIS's environmental web portal. The web portal will be reviewed and evaluated for overall effectiveness and consistency with desired APIS environmental messages by the SEMS Committee and the Superintendent no less than annually.

7.3 LINK TO ENVIRONMENTAL COMMUNICATION

The APIS environmental web portal can be found at <http://www.nps.gov/apis/parkmgmt/iep.htm>.

8.0 TRAINING

Training provides awareness of the IEP among all park employees, so they understand and can support park's environmental mandates and program, provide valuable input, and can help communicate the issues and program effectively to visitors and other stakeholders. Training also ensures that environmental management responsibilities are understood and carried out, and that individuals have the knowledge and technical expertise they need to effectively carry them out.

8.1 PROCEDURE

Training on the IEP is provided to all park employees at least annually during seasonal training. It includes review of the ECS/SO#31, explanation of APIS's significant environmental impacts and long term desired conditions, review of progress during the previous year, and an overview of the current year's goals and objectives. In addition, park staff, contractors, and cooperators are provided with training relating to how their activities and operations contribute to environmental impacts. This may include training on meeting specific goals and objectives, training in plans and procedures that support day-to-day environmental management, as well as training in sustainability BMPs that

have been adopted under the IEP. Documentation of training is integrated with APIS' overall system for documenting training and maintaining training records. Hard copies of agendas and handouts for environmental management compliance training and annual IEP training will forwarded by the person responsible for each training to the IEP record keeper and maintained in park IEP files in accordance with Section 6.0.

8.2 RESPONSIBILITIES

IEP awareness training is the responsibility of the Green Team and Superintendent. Where feasible, day-to-day environmental training that all (or the majority of) park employees are required to attend (e.g., Hazard Communication training) is offered at the same time.

For more specific training, the IEP Training Requirements matrix is developed by the Green Team. This specifies, by title, which positions are required to have what type of training, and designates a responsible individual to coordinate each distinct training session. The designated IEP training coordinator ensures that supervisors are aware of IEP training requirements, and supervisors are responsible for ensuring that staff are provided an opportunity to attend the training.

8.3 LINK TO ENVIRONMENTAL TRAINING REQUIREMENTS

The matrix used to describe training requirements in the IEP Management Workbook (Excel spreadsheet) can be found in 8. TRAINING REQUIREMENTS.

8.4 LINK TO ELECTRONIC TRAINING RECORDS

This will be updated once the park's electronic training recordkeeping system is established.

9.0 OPERATIONAL CONTROL AND MONITORING

This section of the IEP describes how park staff monitor and measure, on an annual basis or more frequently, whether or not the IEP is achieving its stated goals and objectives, including the goals identified in EO 13423 and environmental management compliance with applicable laws, regulations, and standards. In addition, it identifies key metrics that park staff use to determine if the IEP is moving the APIS organization toward the defined future visions that employees strive to attain.

9.1 PROCEDURE

Key points of operational control are those measures and precautions that APIS staff can take to reduce or eliminate potential environmental impacts. They may include physical points of control (e.g., secondary containment for hazardous materials and waste storage), regulatory controls (e.g., hazardous waste manifest for tracking whereabouts of hazardous waste), and administrative controls (e.g., inspections of container or tank integrity). Key operational controls will be identified and incorporated into APIS activities and operations as follows:

- For each significant impact, the broadest key operational controls are identified in the Impacts and Future Visions Workbook;

- More specific operational controls are incorporated into park written environmental programs, Sustainability BMPs documented in the Environmental Stewardship Matrix, contracts, special use permits, and partnership agreements as they are developed or updated; and
- As job hazard analyses (JHAs) are updated, an environmental element will be added that identifies appropriate operational controls to reduce or eliminate environmental impacts associated with that job task.

In addition, steps to monitor the progress toward achieving annual goals and objectives are determined, and metric targets (qualitative or quantitative) are identified so park staff will be able to determine when each objective has been fulfilled.

Finally, long term metrics that will be maintained cumulatively year after year are defined so that park staff can measure progress over the long term toward achieving future visions.

9.2 RESPONSIBILITIES

The Green Team identifies key points of operational control and how they are monitored and addressed in each tab of the Impacts and Future Visions workbook. The Green Team also ensures that key points of operational control are addressed in-park, and that park environmental plans and programs, sustainability BMPs, and partnership agreements are reviewed to ensure that they are addressed and incorporated into training associated with each. COTRs and ATRs are responsible for ensuring that language to address key points of operational control is incorporated into park contract pre-contract meetings, and contract specifications as appropriate, communicated to contractors, and monitored. Monitoring compliance will continue throughout the life of contracts.

The Green Team is responsible for determining metric targets (qualitative or quantitative) for each of APIS's environmental objectives outlined in Section 4.0, with input from and approval of the Superintendent. Each person with responsibility for an objective will report progress to the IEP record keeper by email no less than semi-annually.

The Green Team will also determine the key long term metrics, with input and approval by the SEMS Committee and Superintendent. Once determined, the Green Team Chair will coordinate with the Division Chiefs, IT Specialist, and park resource specialists to develop a strategy for the accomplishment of data collection. Annually, data associated with key metrics is compiled for evaluation as part of the IEP Management Review described in Section 10. **Note:** As a 2011 objective and target, the park is currently working on key long term metrics for greenhouse gas emissions. Objectives and targets to develop additional key long term metrics will be developed in subsequent years.

9.3 LINKS TO KEY OPERATIONAL CONTROLS AND METRICS

Key operational controls and metrics are maintained as follows:

- Key operational controls are identified in the IMPACTS and FUTURE VISIONS.

- Progress on the IEP goals is tracked in the IEP Management Workbook (Excel spreadsheet) through the 4. GOALS, OBJECTIVES & PROGRESS tab.

10.0 EVALUATION AND CORRECTIVE ACTION

Going forward, it is critical for park staff to evaluate the IEP to ensure that it is being fully developed and implemented, and that it conforms with NPS EMS protocol. Since day-to-day environmental management is incorporated into the IEP, evaluation will include periodic and documented evaluation of environmental management compliance with legal and other requirements. Where deficiencies are noted through these reviews, a procedure is provided to guide park staff in leading corrective actions to remedy those elements of the IEP that are not functioning, or have failed to achieve established goals, objectives, and target metrics.

10.1 PROCEDURE

The IEP is reviewed annually to ensure that it continues to meet external standards, including DO 13A and the NPS Model EMS, and that procedures established in the IEP are functional and optimized to the culture and processes at APIS. In addition, in accordance with EO 13423, the IEP should be evaluated at least once every three years by a qualified auditor outside the control or scope of the IEP. Evaluation will also include an internal environmental audit that will be conducted no less than annually. The scope of the internal environmental audit may be focused or broad, but should be based on priorities and concerns of park staff, any indicators of performance problems, and available resources. Where non-conformances are identified, a corrective action team will be designated to review the contributing causes, develop a corrective action plan, implement the plan, and monitor and report on results of the plan.

10.2 RESPONSIBILITIES

The Superintendent has overall responsibility for the evaluation and corrective action process. During at least one SEMS Committee meeting each year (may be a combined meeting) the Superintendent will gather feedback and evidence related to the functionality and effectiveness of the IEP and progress on achieving goals and objectives. This evaluation process will be documented in meeting minutes.

The Superintendent will work with Midwest Region Office staff to arrange for and coordinate an external EMS evaluation of the APIS IEP to be conducted at least every three years by a party outside the scope of the Apostle Islands National Lakeshore IEP. Results of these evaluations will be maintained on file and responded to following the corrective action procedure described below.

In addition, the Green Team will, with input from the Superintendent, organize at least one environmental audit each year, with a focus on regulatory environmental management compliance obligations. The scope of the audit will be determined by the Green Team at the beginning of the year. Once every 3 to 5 years, the MWR Office conducts an external, documented environmental and safety audit. During those years, this external audit will function as the annual environmental audit for purposes of the IEP.

Once non-conformances are determined (either during internal or external the IEP evaluation or environmental audit), the Superintendent will assign a corrective action team to address each non-conformance (may be the SEMS Committee, or a more focused group, depending on the nature of the non-conformance). The corrective action team will develop recommended corrective actions, including steps and schedule, and, with review and approval of the Superintendent, follow through accordingly. The corrective action team will submit a progress report within a specified time period to document whether the corrective action has worked and the non-conformance is closed. If not, the cycle will be repeated until closure is obtained. Corrective action plans and follow up may be documented through meeting minutes of the corrective action team.

10.3 LINK TO MOST RECENT INTERNAL IEP REVIEW

<Link Pending - Internal IEP Review Meeting Minutes and Status>

10.4 LINK TO MOST RECENT EXTERNAL EMS REVIEW

< Link Pending - External EMS Review and Status>

10.5 LINK TO MOST RECENT INTERNAL ENVIRONMENTAL AUDIT

< Link Pending - Internal Environmental Audit and Status>

10.6 LINK TO MOST RECENT MWR ENVIRONMENTAL AND SAFETY AUDIT

< Link Pending - MWR Environmental and Safety Audit and Status – external link to WASO Web-page>

11.0 MANAGEMENT REVIEW

Management review requires the documented review by the Superintendent and the Management Team on an annual or more frequent basis of the direction and intent of an IEP, including progress in achieving goals, objectives and targets, and to determine whether it is achieving the intent of the environmental commitment statement.

11.1 PROCEDURE

The results of the annual evaluation of IEP are used as a starting point for APIS management team to conduct the management review. In addition, changes to APIS's General Management Plan, upcoming projects or initiatives, and other management priorities will be considered in developing the management review. The management review will be documented, signed by the Division Chiefs (SEMS Committee), and certified by the Superintendent. It will then be transmitted and communicated as appropriate.

11.2 RESPONSIBILITIES

Based on the results of the annual IEP evaluation described in Section 9.0, the Green Team Chair will present the findings to the Superintendent and Division Chiefs at a dedicated SEMS Committee Meeting. The presentation will address suitability of the IEP to park culture and mission, its value and effectiveness in achieving the intent of the ECS/SO#31, and changes to mission or management emphasis in the upcoming year that

should be considered. Based on this discussion, the management team, guided by the Superintendent, will develop recommendations or guidance for the SEMS Committee and park staff to take into account when carrying forward with the IEP.

Detailed meeting minutes will be maintained, and, based on these discussions, the Green Team Chair will prepare a brief summary for inclusion in the Management Review Summary and Certification, for signature of the Superintendent. This signed management review document will be formally transmitted by email to the EMS record keeper, and maintained on file in accordance with Section 6.0.

11.3 LINK TO MANAGEMENT REVIEW SUMMARY AND CERTIFICATION FORM

< Link Pending - Management Review Summary and Certification Form>

11.4 SUMMARY 0F PAST ACCOMPLISHMENTS

The matrix in the IEP Management Workbook (Excel spreadsheet) summarizing accomplishments during the past year can be found in 4. GOALS, OBJECTIVES & PROGRESS.

11.5 LINK TO MOST RECENT MANAGEMENT REVIEW

Links related to the management review include:

- < Link Pending - Management Review Summary and Certification>
- < Link Pending - Management Review Meeting Minutes>