



**DEPARTMENT OF THE ARMY
OFFICE OF THE CHIEF OF ARMY RESERVE
2400 ARMY PENTAGON
WASHINGTON, DC 20310-2400**

DAAR-ZA (200A)

6 October 2025

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Delegation of Authority #25-21: Approval of Environmental Condition of Property Reports and Findings of Suitability to Transfer

1. References.

a. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, 13 December 2007.

b. Memorandum, U.S. Army Legal Services Agency, JALS-EL, subject: Update of Environmental Condition of Property Reports, 7 May 2009.

c. Memorandum, Office of the Assistant Chief of Staff Installation Management, Installation Services, Environmental (OACSIM (ISE)), DAIM-ISE, subject: Designation of Signature Authority for U.S. Army Reserve (USAR) Environmental Condition of Property (ECP) Documentation, 10 May 2017.

d. Memorandum, Office of the Assistant Chief of Staff for Installation Management OACSIM, DAIM-ISE, subject: Authorization for Delegation of Signature Authority for U.S. Army Reserve (USAR) Environmental Condition of Property (ECP) Documents, Category Types 1 and 2, 28 September 2017.

e. Operations Order 18-006, United States Army Reserve Command (USARC), Army Reserve Mission Command FY18.

f. Memorandum, Office of the Chief of Army Reserve, DAAR-ZA, subject: Delegation of Authority #21-09: Approval of Environmental Condition of Property (ECP) Reports and Findings of Suitability to Transfer (FOST), 6 July 2021.

g. American Society of Testing and Materials (ASTM) Standard D6008-22, Standard Practice for Determining the Environmental Condition of Federal Property, 2022.

h. ASTM Standard D5746-24, Standard Classification of Environmental Condition of Property Area Types, Including Explosives Safety for Federally Owned Real Property, 2024.

2. Purpose. Delegate approval authority for ECP and FOST in support of USAR real estate and/or military construction activities. The delegations are tiered, based upon a property's known or assumed risk of environmental cleanup liabilities, as identified by the ECP classification type

DAAR-ZA (200A)

SUBJECT: Delegation of Authority #25-21: Approval of Environmental Condition of Property Reports and Findings of Suitability to Transfer

recommended within the ECP Report.

3. Authority. These delegations are subject to compliance with applicable laws and regulations and are made in accordance with (IAW) and to the extent authorized by References a, b, c, and d.

4. Definitions.

a. ECP Reports. Defined in Reference a. Any reference within this memorandum to ECP Reports also includes ECP Update Reports (ECP-U) and ECP Recertification (ECP-R) memorandums.

b. ECP Classification Types. The ECP Types range from 1 (least liability) to 8 (most potential liability), as defined in Reference a, and are mandated for use within an ECP Report by Reference a.

5. Scope. AR 200-1, Chapter 15 (Reference a), identifies two distinct types of approvals required for ECPs and one approval authority for FOSTs. The FOST approval authority is dependent upon the ECP Type classification.

a. ECP Category Designation. The responsibility of the Garrison Commander (GC) based on the results of the ECP Report and actions taken to address contamination (see Reference a. AR 200-1, Chapter 15 and Table 15-1). Within the USAR, the Readiness Division (RD) Commanding Generals (CG) assume all AR 200-1 GC responsibilities.

b. ECP Report Approval. Responsibility resides with the Chief of Army Reserve (CAR), IAW Reference c, and as the USAR clarification of the Army report approval requirement established in AR 200-1, Chapter 15 and Table 15-1 (Reference a).

c. FOST Approval. Responsibility resides with the CAR for FOST category designation Types 1-4, IAW Reference c, and as the USAR clarification of the Army approval requirement established in AR 200-1, Chapter 15 and Table 15-1 (Reference a).

6. I hereby delegate the following approval authorities:

a. The CGs of the four (4) RDs and the 9th Mission Support Command (MSC) are delegated the authority for ECP Report Approval for ECP and FOST Reports Types 1 and 2.

b. The Chief Financial Officer (CFO)/Director for Resources, Installations, and Materiel (DRIM) for the Office of the Chief of Army Reserve (OCAR) is delegated the authority for ECP Report Approval for ECP Reports Types 3 through 8 and FOSTs Types 3 and 4.

7. The delegations authorized in paragraph 6 cannot be further delegated, with the following exceptions:

DAAR-ZA (200A)

SUBJECT: Delegation of Authority #25-21: Approval of Environmental Condition of Property Reports and Findings of Suitability to Transfer

a. IAW Reference d, the CFO/DRIM may delegate signature authority within the OCAR, but not below the Director, Army Reserve Installation Management Directorate (ARIMD), and the RD and MSC CGs can delegate signature authority within their organizations, but not below the RD Director of Public Works or MSC Director of Theater Support Group.

b. Any delegations authorized by the CGs must be made contingent upon the documented concurrence of the organization's legal, master planning, real estate, and environmental section chiefs for each document approved under said delegation.

8. ECP Report Approval Attestation. The statement to be used to indicate approval is as follows: "To the best of my knowledge and belief, based upon this ECP report and facts presented to me, the conditions of the property described within this document are true at this time, and this report is in general accordance with the Department of Defense requirements for completion of an ECP report."

9. This memorandum shall also serve to clarify that the CGs of the RDs and the MSC are authorized to further delegate their authority to approve ECP Category Designations. Such delegations are subject to the same constraints as those established for ECP Report Approval authority in paragraph 6.

10. For ECP Reports Types 1 and 2, the legal reviews can be completed at the RD and MSC level. The legal reviews for Types 3 through 8 shall be completed by OCAR ARIMD or their legal review designee.

11. Period. This delegation will remain in effect until superseded, modified, canceled, withdrawn, or rescinded. All delegations are subject to review for the purpose of cancellation or renewal, and I retain the authority to cancel or withdraw the delegated authority at any time.

12. For additional information, please contact Ms. Brande Goracke at (703) 806-6754 or brande.l.goracke2.civ@army.mil.



ROBERT D. HARTER
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Chief of Army Reserve/Commanding
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DAAR-ZA (200A)

SUBJECT: Delegation of Authority #25-21: Approval of Environmental Condition of Property Reports and Findings of Suitability to Transfer

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CF:

Deputy Chief of Staff, G-9 (DAIM-ISE)

U.S. Army Reserve Command (AFRC-OPE)