

Definition of a Project File

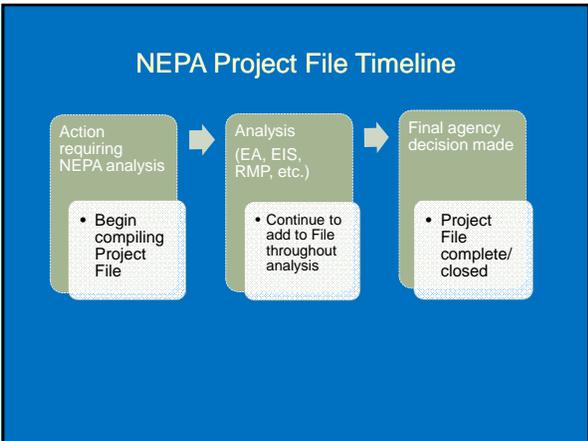
- File that includes all documents associated with a NEPA document (all levels)
- Contains the “story” of the BLM’s decision from initiation/application to decision record
- Provides the supporting rationale behind the project
- Is an open file until signature of the DR or ROD

NEPA Project File

Q: Why is it important?

A: A current and complete Project File:

- Is the paper trail that documents the agency’s decision-making process and the basis for the agency’s decision.
- Provides a centralized and accessible location for project information.
- Serves as the basis for the Administrative Record should the NEPA analysis or final decision be challenged in court.



NEPA Project File

A project file should be initiated for:

- RMPs
- RMP Amendments
- EISs
- EAs
- CXs
- DNAs

*** Remember ***

The project file should tell the "story" of the BLM's final decision.



So What Should be Included in the NEPA Project File?

Project File Contents - Documents

- Draft Versions
 - Keep:
 - Drafts with significant changes
 - Drafts with comments that may lead to changes
 - Toss
 - Drafts with only grammatical changes
 - Drafts with only formatting changes
 - Personal drafts you didn't share with anyone




Project File Contents - Documents

- Internal Review Comments that make noteworthy changes to the document
 - Email
 - Track Changes/Comments on Draft Versions
 - Comment Forms
 - Phone Calls
- Final Versions
 - Documents that are released to the public should be highlighted and saved separately



Project File Contents - Documents

- Supporting Materials/References
 - Documents that support the decisions made and analysis done through the NEPA process



- Websites
- Professional Papers
- Maps and GIS data
- Internal Memoranda and Policy
- Handbooks

Project File Contents - Communications

<u>Internal</u>	<u>External</u>
• Emails	• Notices
• Meeting notes	• Public comments & Responses to the Public

NEPA Project File – Meeting Notes

- Interdisciplinary team meeting notes should be added to the Project File.
- Meetings with other parties should also be carefully recorded.
- Notes for the file should include:
 - Meeting date
 - Attendee names and titles
 - Author of meeting notes
 - List of subjects covered
 - Proposals, agreements, team recommendations



E-mail and Electronic Information

- Including e-mail correspondence provides critical evidence that a decision was considered, discussed, and (perhaps) changed, before being finalized.



E-mail and Electronic Information

Save emails that:

- Are relevant, substantive, and document the decision-making process.
- Propose or discuss substantive changes to a draft primary document.
- Document substantive supervisory instructions to staff relating to the decision-making process.

E-mail and Electronic Information

Delete emails that:

- Are irrelevant to the decision-making process and do not show deliberation.
- Only discuss scheduling of meetings.
- Only include copies of previously saved emails.
- Include attachments with no additional discussion (save attachment only).

Who maintains the Project File?

Project Lead or Records Coordinator

- Creates a centralized electronic and physical file location\
- Provides expectations and standards to the team.
- Reminds ID Team members and others to regularly contribute to the File.
- Provides Quality Control.



Contractor Created Files

When a contractor is managing the project file, make sure they are following the standards set by BLM and organizing the file in a manner appropriate for BLM files.

- The SOW should outline the roles and responsibilities including the standards and methods of transfer.
- *NOTE: The BLM owns the records!*
- The BLM should be concurrently creating a record and not relying on the contractor for all records.



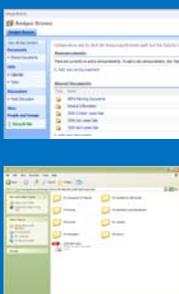
Hardcopy v. Electronic

- BLM Record Policy = hardcopy
- OHA/IBLA Requirements = hardcopy & electronic NEPA docs
- Court Requirements = electronic



Electronic Project File

- Keep electronically when possible—easy access, better organization.
- Store on internal shared drive or SharePoint.
- Most courts require admin records to be sent on searchable electronic DVDs.
- Print completed record to meet BLM record retention requirements.



Organizing an Electronic File

Each new project file should attempt to follow a similar organizational structure to provide consistency.

Consistency in the files will assist in the case that multiple projects are included in a lawsuit

A coding/numbering system can be used to organize files.

- EIS
 - External Scoping/Public Notice and Involvement
 - Notice of Intent
 - Scoping Letters/Issue Identification
 - Communication Plan
 - Internal Scoping/Organization
 - ID Team Meeting Notes
 - Legal Review/Laws and Policy
 - Contract Information
 - Draft EIS
 - Final Document
 - Draft Versions
 - Notice of Availability
 - Briefing Materials
 - Comments/Reviews
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