

Attachment 2: Statewide Project Management Process for EISs and EAs

Purpose: This Attachment provides the protocol for BLM Nevada (BLM NV) for processing and approving federal actions, specifically as it relates to:

- The Project Management Process (PMP), including project initiation and preplanning;
- Project Management for projects that require National Environmental Policy Act (NEPA) compliance analysis;
- Ensure consistency within BLM NV in complying with applicable regulations when authorizing federal actions.

This Attachment facilitates consistency and coordination throughout BLM NV by ensuring that Managers, including Branch Chiefs, Project Managers (PMs) / Planning and Environmental Coordinators, and Interdisciplinary Team (IDT) members are informed of their roles and responsibilities related to the PMP. This Attachment is not intended to capture all of the specific details related to project permitting, but rather to provide an overall outline and framework to guide a District, Field Office, or statewide team through the process and to ensure consistency.

The purpose of this Attachment is to describe processes that ensure all Environmental Impact Statement (EIS) documents, do not exceed 150 pages (or 300 pages for unusually complex projects) and Records of Decision (ROD) are approved within one year of the publication of the Notice of Intent in the Federal Register. For Environmental Assessments (EA), pending approval of the Authorized Officer to address unforeseen or unique circumstances, the total page limit does not exceed 75 pages and a Finding of No Significant Impact (FONSI) will be signed no later than six months from the time the EA and supporting documentation are entered into ePlanning to begin the public comment period.

This Attachment pertains to all Environmental Assessments (EAs) and Environmental Impact Statements (EISs) for mine permitting, renewable energy development, fluid mineral leasing and development, special recreation permits, fire management and treatment plans, grazing permit renewals, habitat restoration, realty rights-of-way, and all other projects that require an EA or EIS level analysis. This Attachment refers to a project mine proposal, but the PMP, as described below, is provided as an example and is applicable to all project types.

Background: In years past, the traditional process of preparing an EA or EIS document and issuing a permitting decision usually took years to complete particularly with complex federal actions. The primary reason for extended delays in completing these documents was BLM's tendency to begin the NEPA process upon receiving and perfecting the application or plan of operations absent the required baselines studies, surveys, and clearances needed for the environmental analysis. Following constructive feedback from proponents and industry representatives, the Nevada State Office issued NV IM 2014-019: *Guidance for Permitting 3809 Plans of Operation* and related attachment, Pre-Plan of Operations Coordination Process.

This policy emphasized the need for preplanning and instructed District Offices to refrain from beginning the NEPA process (posting an EA to ePlanning or publishing a Notice of Intent (NOI) in the Federal Register for EISs) until BLM has received and accepted all required baseline information from the proponent. Although specific to mining EISs, this policy is applicable to the preparation of EAs or EISs for all other program areas. This policy specified seven steps to follow during the pre-plan of operations phase of the process. Since the latest renewal by the Nevada State Director in 2019, the BLM Washington Office has adopted this policy through the issuance of Washington Office IM 2017-103. This policy supersedes NV IM 2014-019. To date, numerous entities that work with BLM have adopted this NEPA streamlining policy as standard operating procedure.

Outlined below are the basic project permitting steps that each District or statewide team will follow while processing applications, implementing the NEPA process, and authorizing federal actions. Also identified are the Field Manager (FM), Assistant Field Manager (AFM), Project Manager (PM), Technical Lead (TL), and IDT member roles and responsibilities related to the Project Management Process (PMP). For statewide teams, Branch Chiefs will assume the FM and AFM responsibilities. As previously stated, these steps are not intended to be all-inclusive or directly applicable to every project. This is merely an outline of the PMP that has been established to identify opportunities for streamlining and to provide consistency within BLM NV to plan and manage workloads effectively. There may be situations where this process may vary, however, it is anticipated that these will be few and will be approved by the District Manager or the applicable Deputy State Director for statewide teams in rare or unusual circumstances.

Beyond specifying the required steps in the project management protocols, this policy also describes the approach both for EA and EIS level project management. This process will be adhered to for the preparation of these NEPA documents, which would be prepared in support of federal actions associated with the full spectrum of program areas. BLM NV initiated projects will follow this same process as well. In the interest of being efficient with the policy narrative, only project proponent-initiated text is provided.

Project Management Process

Project Management Processes: Refer to Attachment 2.A: Project Management Flow Chart

1. Project Initiation and Preplanning

Step 1: Project Proponent Contacts the BLM at the Conceptual Stage:

The proponent contacts the field office as soon as a decision has been made to pursue the development of a mine project proposal. These may consist of any plan of development associated with an application. This coordination begins when the proponent can provide a clear project description, conceptual drawings, and maps. In many cases, this notification can be one or more years (or as earliest as possible) before an actual submittal of a mine plan, POD, application, or proposal to the BLM. This step may be combined with the following Steps number 1, 2 and/or 3 depending upon the status of the proposal by the project proponent.

Step 2: BLM Project Acceptance:

In cases of discretionary projects, the FM decides if the Field Office will accept the project based on current and short-term workloads. If the project cannot be accepted at that time as a priority for the current fiscal year, the FM will determine the next appropriate steps for notifying the applicant and estimating a future time when the project may be accommodated. For non-discretionary proposals, the Field Office TL will review the plan or application, perfect the plan or application per the applicable regulations, and determine based on Field Office or District priorities when the NEPA/PMP described in this policy would be scheduled.

Step 3: Project Proposal Meeting:

Once a project has been accepted by the BLM, and the field office has been notified of a subsequent future application, the PM will meet with the FM and AFM or Branch Chief to initiate the pre-planning process and present the project at the following Monthly Planning Meeting (MPM).

Project is presented at an MPM: If it is decided that the project *will* be presented, the AFM, PM or TL assigned to the project will present the project at the next regularly scheduled District MPM. A Planning and Environmental Coordinator (P&EC) likely will be assigned the role of PM for most projects that will require a NEPA analysis. TLs can serve as PMs for EAs. TLs will work with PMs to coordinate permitting and review efforts.

An IDT will be assigned using an IDT Sheet. Immediately after the MPM, the PM will send an email to the IDT informing them that they have been assigned to the project, along with project background information.

Project is not presented at an MPM: If it is decided that the project *will not* be presented at an MPM, the PM will coordinate with the AFM and FM to determine the appropriate level of NEPA and assign an IDT to the project (as necessary).

For multi-district and statewide projects, the process described above would be addressed in the project delegation of authority memo.

Once an IDT has been assigned to a new project, each resource specialist should initiate a preliminary desktop survey to help determine baseline needs.

Step 4: Project Presentation and Baseline Kick-Off Meeting¹:

Once an IDT has been assigned, the PM will invite the proponent, and affected federal, state, local, and tribal government representatives to attend a meeting to formally present the project and will include:

- A project presentation by the proponent.

¹ For applicable mineral projects, appropriate BLM minerals representatives will meet with the proponent and the Nevada Division of Environmental Protection – Bureau of Regulation and Reclamation (BMRR). They will review the BLM and the BMRR permitting requirements and recommend use of the Voluntary Plan of Operations Outline/Format, determine information needs for the permitting, and review the applicable agency policies and requirements for mine permitting.

- A baseline needs discussion facilitated by the PM, with full participation of the IDT using the Baseline Data Needs Assessment Form (BNAF) as a guide. Baseline needs and data collection, work plans, and protocols will be identified and recorded using the form.
- A preliminary discussion of timelines and schedules as described in this Attachment.
- An electronic transmission (email or thumb drive) with all applicable BLM policies.
- An invitation to this meeting shall be extended to county commissioners, tribal representatives, and applicable federal, state, and local government agencies.

Once a BNAF is prepared, it will be routed to the Authorized Officer (AO) for review and concurrence. After approval, the PM will send the draft BNAF, along with all applicable survey protocols if they have not already been provided, to the proponent and the third-party contractor (if applicable). As baselines are submitted and approved, the PM continues to update the BNAF with dates and other information. Once all baselines are deemed complete and accepted by the AO, the FM, or Branch Chief signs the BNAF within one week and a formal letter is sent to the proponent (see Step 7).

When accepted by the BLM, the baseline reports will be provided to the local or county government as well to other state agencies such as the Nevada Department of the Wildlife for review.

Step 5: Development of the Plan, PoD, or Application:

The proponent is responsible for developing a Plan, PoD, or application for the project. However, BLM IDT members may be asked to provide input during the development of these products. For mining projects, the BLM will give the proponent a copy of the Plan of Operations – Completeness Review form (3809 Handbook H-3809-1, Figure 4.2-2) to be used in compiling a Plan.

Step 6: Official Submittal of the Plan, PoD, or Application:

Once all required baselines, work plans, and/or protocols are reviewed and deemed adequate by the BLM, the proponent may submit the final official Plan, PoD, or application. While the BLM strongly encourages proponents to submit a Plan, PoD, or application only after all baselines are complete, doing so is voluntary. That is, the BLM cannot require proponents to delay submitting Plans, PoDs, or applications. However, the BLM will not initiate the NEPA process until all baselines for the analysis and supplemental environmental reports (SERs) have been completed and accepted by BLM, and the plan or application has been perfected pursuant to the applicable regulations. Attachment 2.C is a completed SER and provided as an example. Prior to this step, the Memorandum of Understanding (Attachment 2.D) between the BLM and the project proponent must be completed.

Step 7: NEPA Determination:

Once all baseline reports have been deemed adequate by the BLM and a final Plan, PoD, or application has been accepted, the FM, AFM (or Branch Chief for statewide projects), PM, and AO will meet to determine the level of NEPA required for the project. While the PM may make recommendations regarding the level of NEPA, the decision

regarding the NEPA level lies solely with the AO. After the AO determines the level of NEPA, the BLM will officially notify (via signed letter) the proponent that:

- 1) All baselines are complete and adequate,
- 2) The Plan, PoD, or application is complete in accordance with applicable regulations,
- 3) The level of NEPA analysis that will be required.

Step 8: Initiate the Streamlined Pre-Planning Process

After the AO determines the level of NEPA, the PM will schedule a **Pre-NEPA Kick-off Meeting** with all IDT members, the Proponent, the NEPA contractor, local, state, and federal government agencies, and tribal government representatives.

Agenda items for pre-NEPA Kick-off Meeting typically include:

- Introductions and a meeting sign-in sheet;
- Presentation of project by the proponent;
- Review of the BNAF, BLM Supplemental Authorities and Other Resources Tables (BLM NEPA Handbook, Appendix 1) to identify resource issues or concerns to be analyzed in the NEPA document;
- Identification of potential cumulative effects study areas (CESA);
- IDT Membership Roles Sheet;
- Develop project schedule from plan of operations submission to Decision Record or ROD;
- Discuss the preliminary IDT call schedule (regularly scheduled meetings between BLM, 3rd party contractor, cooperating agencies, tribal representatives, and proponent);
- Communication protocols;
- As appropriate, the PM will coordinate with the proponent and IDT members to schedule a field visit to the project site.

Available Resources:

Two folders will be created on a local network drive and maintained by P&ECs that will include updated versions of the following resources:

- [BLM NEPA Handbook](#) and other NEPA guidance documents;
- Washington Office [IM 2017-103](#)
- Nevada IM 2019-014: Guidance for Permitting 3809 Plans of Operation – Preplanning.
- The Database of Intensity Level Definitions (ILD);
- Examples of NEPA documents that implement ILD completed by the District, Field Office, or statewide team and other agencies around the country;
- Proposed Action Sheet;
- Cultural Resources Inventory Needs Assessment Form (CRINA);
- IDT Sheet;
- Baseline Needs Assessment Form (BNAF);

- Templates of NEPA documents including DNAs, CXs, Resource Reports, EAs, and EISs;
- NEPA review comment form;
- Other materials and resources as they become available.

The P&EC will provide the location of these folders to the IDT.

2. Achieving Page Limits for EAs and EISs.

Preparation of Supplemental Environmental Reports (SER) (Attachment 2.C) and Supplemental Information Report (SIR) (Attachment 2.B):

After BLM accepts all baselines and perfects the application, plan of development, or plan of operations, and the AO determines the level of required NEPA analysis, environmental reports for each section in the EA or EIS shall be prepared. The SIR outlines the detailed descriptions of the Proposed Action, No Action Alternative, other Alternatives, and Alternatives Considered and Eliminated from Detailed Analysis. The SER is composed of a summary of the proposed action and all alternatives and detailed impact analyses for each of the resources that are both present and affected by the proposal. SER reports will include the following:

- SIR Number 1 – A detailed description of the Proposed Action and Operational Options including any maps, diagrams, or supporting information (see Attachment 2.B); and
- SER Number 1 to End as Needed – A detailed description of the affected environment, and direct, indirect, and cumulative impacts to each resource present and affected. These SERs will also include any applicant committed measures intended to avoid, minimize, or mitigate on-site adverse impacts. Intensity level definitions specific to that resource will also be disclosed as well as the level of effect, including duration (short/long-term) and geographic context (local/regional) (see Attachment 2.C);
- Once BLM accepts all SERs, they will be finalized and will become part of the administrative record. For both EAs and EISs, the SERs will be uploaded to ePlanning with the final NEPA compliant document and will be available if requested by a member of the public. For EA level analysis, the NEPA process time frame begins when the BLM loads the EA and SER documents to ePlanning which triggers the initiation of the public comment period. For EISs, the NEPA process begins on the date that the Notice of Intent is published in the Federal Register.
- The BLM NEPA contractor, as discussed in this Attachment, will be selected and made available early in the preplanning process once most of the baseline reports have been accepted by BLM. This will ensure that the contractor has sufficient opportunity to become familiar with the project,

baseline studies, and other information to facilitate preparation of the preplanning analysis documents (SERs). Funding for the contractor for preplanning work completed prior to an NOI or during the development of an EA will be in the form of a 7122 cost reimbursable account supported by an MOU (Attachment 2.D) with the proponent.

Refer to Attachment 2.B for an example of an SIR and Attachment 2.C for an example of a SER.

3. Completing an EIS within 365 Calendar Days

Step 1: Preplanning:

Following the PMP steps outlined above in this Attachment and consistent with the requirements specified in the preplanning process as described in NV IM 2019-014, the field office (or statewide team) technical lead will review the formal application, plan of development or plan of operations for completeness pursuant to the governing regulations. The Authorized Officer (AO) will make the determination that the preparation of an EIS is warranted.

Step 2: Preparation of the Preliminary Internal Draft EIS, State Director and Headquarters Briefing

Upon determining that an EIS is warranted, the AO will develop an MOU (Attachment 2.D) between the BLM and the proponent that will specify roles and responsibilities for preparing the SERs and preliminary internal draft EIS (PDEIS) and include a monetary provision for voluntary contribution of funds to BLM for the purposes of preparing the SERs and PEIS. The proponent would also agree to fund a third party NEPA contractor that will work for BLM under the provisions of the MOU to prepare the internal PEIS, the subsequent DEIS and FEIS and assist the BLM in the maintenance of the administrative record.

A Request for Proposals (RFP) will then be prepared by the proponent, reviewed by BLM, and made available to qualified environmental contractors seeking interest in being selected to prepare the PDEIS and SERs. The proponent, with concurrence from BLM, then selects the contractor that will work for BLM per the MOU described above.

Once the contractor has been selected, and the MOU approved, a BLM project manager (PM) will be assigned as the lead for the PDEIS. The pre-planning, NEPA determination, and PMP steps outlined above beginning on page 2 of this Attachment and ending on page 5 of this Attachment will be followed by BLM and the proponent as a prelude to preparation of the SERs and PDEIS. The page limit provision described on 2. *Achieving Page Limits for EAs and EISs* above will also be followed in order to complete a PDEIS within the 150-page requirements.

The BLM will work with tribes (government-to-government consultation), local government, state, and federal agencies during the pre-planning stage as well as during the preparation of the SERs and PDEIS. It is important to remember that since the NEPA process has not formally begun at this point, there is no formal

cooperating agency status for these cooperators. It is important to consider and incorporate the comments and feedback from these governmental agencies throughout the development of the SERs and PDEIS. This will ensure a much more streamlined EIS process once the formal NEPA process begins after the publication of the NOI in the Federal Register.

The remaining steps in this process will be in accordance with existing BLM policy for NEPA compliance including the requirements specified in Headquarters PIM 2023-004, *Bureau of Land Management Environmental Impact Statements Document Clearance Process*, [ERM 10-11](#) and associated stepdown guidance from the Nevada State Office (NV IM 2023-003, Change 1).

4. The Administrative Record (AR)

The location of the Administrative Record (AR) for a project will be in the office the PM resides. Should a project be initiated in one office, and a different office takes over the NEPA process, the entire AR would be migrated to the office handling NEPA. The PM will ensure that all IDT members know the location of the project files on the local network drive. The office not maintaining files could have a folder with the project name containing one document with information on the correct location/link of the administrative record.

Proper File Naming

The PM will ensure that IDT members and contractors use the following naming convention for project folders and file names: DATE_ProjectName_NameOfFile

- 20230317_ProjectName_FileDetail, for example: 20230317_HappyEIS_MtgNotes

5. Team Members Roles and Responsibilities:

Field Manager (FM) or Branch Chief for statewide teams:

- Makes decisions about the level of NEPA required, in consultation with PMs.
- Receives periodic updates from AFMs and PMs.
- Does not need to attend all project meetings and calls.
- Relies on the PM to be the conduit between BLM and outside agencies and the proponent for routine and non-routine requests regarding meetings, deliverables, etc.
- Participates in the monthly ADM/Planning meetings.
- Decides if a project will be accepted.
- Reads all NEPA documents prior to routing to the state office and solicitor and prior to being made available for public comment.
- Briefs the District Manager on project status and related issues through the life of the project.

Assistant Field Manager (AFM) or Branch Chief for statewide teams:

- Participates, when available, on project meetings and calls.

- Coordinates with the PM regarding project issues that need to be resolved outside of routine project protocols, particularly if it involves outside agencies.
- Relies on the PM to be the conduit between BLM and outside agencies and the proponent for routine and non-routine requests regarding meetings, deliverables, etc.
- Consults, as necessary, with the PM or TL regarding project issues when communicating with either the proponent or outside agencies.
- Participates in the MPMs.
- Ensures that all IDT members and technical specialists thoroughly read, provide input, and surname to all baseline reports, SERs, and NEPA documents from pre-planning to the development of the FEIS and ROD.

Project Manager (PM):

- Participates in the MPMs, which the District/Field Office/statewide team Lead P&EC facilitates.
- Manages the day-to-day BLM/consultant relationship.
- Interfaces regularly with the IDT on project deliverables, comments, etc.
- Coordinates the day-to-day correspondences and project components such as bi-weekly and monthly calls, deliverables, etc.:
 - Sets and disseminates agendas.
 - Coordinates regularly with consultants, FMs, and AFMs (or Branch Chief for statewide teams).
 - Acts as the liaison and main point of contact between the IDT, the consultant, and the proponent.
 - Requests and coordinates deliverables and solicits input and comments from the IDT.
 - Consolidates and helps to reconcile IDT comments for formal FM (or Branch Chief) approval.
 - Coordinates and helps to reconcile issues between BLM, the proponent, and outside agencies.
 - Coordinates the preparation of briefing papers, correspondence letters and other project-related support documents for the project and/or on behalf of District, State, and Washington/HQ leadership.
 - Maintains project files in an orderly and organized manner using the proper naming convention. Coordinates at the start of a project regarding who will be keeping the official administrative record: the BLM or the contractor.
 - Maintains and updates the project schedule.

Technical Lead (TL):

- Is an integral part of the IDT and serves as the technical expert based on the type of project. For example, the role of Technical Lead for a mining project would be an IDT member from the minerals group and would be the lead specialist for review and acceptance of a perfected application. The Technical

Lead (i.e. mining engineer, geologist, realty specialist) does not manage the NEPA process or serve as the project manager).

- Helps provide the PM, IDT, proponent, and others with resource-specific technical and policy information.
- Consults, as necessary, with the PM or AFM regarding project issues when communicating with either the proponent or outside agencies.
- Has all the same responsibilities as an IDT member.

IDT Members:

- Completes the preliminary desktop surveys after a project presentation.
- Participates in the Baseline Kick-off Meeting.
- Participates in the NEPA Kick-off Meeting.
- Participates in project bi-weekly calls as needed. If an IDT member's resource is on the agenda and the IDT member is unable to attend the meeting/call it is their responsibility to provide information to the PM and/or AFM so it can then be relayed during the meeting.
- Acts as subject matter expert for their resource.
- Comments on NEPA and other documents in a timely manner as requested by the PM. Coordinates late responses with the AFM and PM.
- Responds to routine inquiries through the PM and copies the PM on all correspondence.
- Asks the PM to facilitate calls or meetings with outside agencies.
- Is pro-active in researching how to apply BLM rules and regulations to their resource.
- Informs the FM, AFM, or Branch Chief for statewide teams, and PM when policy ambiguities arise.
- Puts in a Help Desk ticket to gain access to field office local network project files if they are in a different field office.

Leadership Expectations of All BLM Employees:

- Represent BLM at all times with a high degree of professionalism,
- Maintain composure while developing solutions to problems as they arise.
- Be intimately familiar with the documentation and analysis that each member is responsible for.
- Treat proponents, cooperators, contractors, and members of the public with respect.
- Communicate issues affecting project schedules with management as they arise.
- Follow laws, regulations, and BLM/DOI policies while engaged in the PMP.
- Ensure project management is consistent within Districts, Field Offices, Divisions, and Branches, including the Division of Fire Management, and consistent between Districts and Statewide teams.

The District, Field Office, or statewide team generally will not make a final determination of the required level of NEPA or begin the NEPA process until all required baseline information has been submitted and accepted by the BLM. This Attachment regarding the statewide project management process is effective upon issuance. All questions regarding the implementation of this policy should be directed to the Nevada State Office Planning and NEPA staff. Any exception to this policy will be at the discretion of the responsible District Manager or Deputy State Director.

Attachments:

2.A Project Management Flow Chart

2.B Sample Supplemental Information Report (SIR)

2.C Sample Supplemental Environmental Report (SER)

2.D Sample Third Party Memorandum of Understanding (MOU)

Attachment 3: Best Practices and Procedures for Routing NEPA Documents and Requesting NVSO Review

Many references on NEPA procedures are available at the internal BLM Nevada Planning and NEPA SharePoint site and by consulting the NEPA staff at NVSO. This SharePoint site features existing IMs as examples from Nevada Offices, the Nevada EIS Review project tracking spreadsheet (Dashboard) in the site Documents section, the FAST-41 procedure, and other policy direction and guidance. At this time, the spreadsheet has tabs for current projects and a tab that includes information on projects that have completed the NEPA process. This SharePoint site is maintained and updated by the NVSO planning and NEPA program staff in collaboration with P&ECs, Project Managers, and others from District Offices and the Dashboard file will be updated by District Offices on a biweekly basis, and prior to the monthly EIS status meetings held on fourth Tuesdays of the month.

1. Contact the NVSO Planning & NEPA staff to gain edit permissions needed to update the Dashboard tracking spreadsheet / database.
2. Upload the project Draft and Final EISs for review into the appropriate Repository folder under Documents at the Nevada Planning and NEPA SharePoint site
3. Create a new sub-folder per District Office, clearly labeled with the official project name (or a short version of that project name) within this designated SharePoint site.
4. Place the EIS, appendices, resource reports, and associated documents into that project folder or sub-folders that are separate from earlier versions of the EIS.
5. Include a project-specific, cumulative comments form that allows concurrent, collaborative editing by multiple users.
6. Note atop the project-specific form the NEPA project and document name, field contact(s), and Cost-Recovery numbers in format suitable for QuickTime entry.
7. Include a single collaborative Word document comment sheet for reviewers to enter comments and to show resolution of comments by the EIS team. Commenting as track changes or reviewing modes directly into the Word doc also may be an option instead of a separate comment form but consult with NVSO staff first.
8. Subdivide as separate files any documents that may be larger than 200 mb in size, such as Appendices (e.g., an Appendix of all maps may warrant status as a separate file or volume because of the file size).
9. Initiate the NVSO review request by sending an email to this group email (BLMnevadaNEPA@doimsp.onmicrosoft.com or BLM Nevada NEPA in the email directory), with copied (cc) email messages to others as appropriate, once all documents are placed into the project-specific Repository subfolder. That group email goes to multiple NEPA staff at NVSO to facilitate workload coverage if a specific person is not available to coordinate the review.
10. Include in the email message the contact details for the EIS project manager and any special instructions or highlights for the attention of the reviewers, including cost-recovery numbers. That email will be suitable for forwarding to many individuals at NVSO and Zonal specialists who might be reviewers.

11. Initiate the 14-calendar day review period, date determined and confirmed by NVSO, once all the pertinent documents are placed into the SharePoint Repository folder as a complete package, thereby setting the review due date for the comments on the designated form.
12. Avoid entirely any project-specific websites set up by a Contractor or other outside party as the venue or procedure for NVSO review, although such collaborative websites may be useful for earlier coordination within an Interdisciplinary Team.
13. Save (or download) a copy of the comment form upon completion of the NVSO review period, while leaving the original version intact in the project folder at the SharePoint site.
14. Update the EIS project tracking spreadsheet to indicate that the NVSO comment period has been completed.
15. Consider the review comments entered onto the form to be draft comments, subject to change, and not the final comments until the end of the review period deadline, although the comments may be viewed in-progress as they are entered during the 14-calendar day period.
16. Initiate solicitor review once the review and comment period by NVSO and cooperating agencies is completed and incorporated into the document(s) by the EIS project team (including any contractors).
17. Enter responses to comments and how the EIS will address those comments onto a column on the right side of the cumulative comments form, a process likely before Solicitor review but that also may begin early during the 14-calendar day review period using the same comment form accessible by all.
18. Place those responses to comments on the annotated comment form in the same SharePoint Repository folder as the documents for review, with an email notification sent to the same group address indicated above, no later than five workdays prior to the State Director briefing date.
19. Contact the State Director's Executive Assistant (Leslie Borden) to schedule a briefing. Ask that the following people be included in the calendar invitation: State Director; Associate State Director; DSD Minerals; DSD Lands, Resources, and Planning; Resource Advisor to the State Director; Branch Chiefs for NV 921, 922, 933, 934; NVSO Planning & NEPA staff and District/Field Office staff (as appropriate).
20. After the NVSO and solicitor review and comments from both are incorporated into the EIS, create a Document Tracking System (DTS) package of required documents, in close coordination with NVSO, to move the EIS and Federal Register Notice (FRN) package forward for BLM Headquarters briefing as described in the above IM NV 2022-003.
21. Include the Draft or Final EIS, the FRN package, and appropriate or required briefing documents in the DTS package. District and NVSO will read and comment on the FRN package documents prior to surnaming in DTS.
22. Incorporate all surnaming comments by NVSO on the briefing documents and FRN packages in DTS.
23. Request, after the EIS and FRN packages have been uploaded into DTS, the BLM Headquarters briefings with the assigned HQ Resource Advisor, and concurrently notify NV- 912.

24. Notify NV-933 Nonrenewable Branch Chief and NVSO Planning & NEPA staff for any EA or EIS that involves a Resource Management Plan Amendment. Within 2 days after Federal Register publication of the Notice of Intent and the Final EIS Notice of Availability (NOA), provide a revised schedule that includes the protest resolution period and Governor's consistency review as separate timeline items, so the amendment process can be tracked, and BLM Headquarters can be notified to arrange for a timely protest resolution report and Solicitor review for any valid protests.
25. Confirm with NVSO that the EIS, at this stage, has a completed administrative review, a near 'camera-ready' document(s) as high-resolution PDF files, and meets the BLM Headquarters briefing standards described above.
26. Upload the EIS (public Draft or Final) into the EPA eNEPA system, as a critical procedural step, one week prior to the BLM FRN publication date, and abide by earlier deadlines due to Federal holidays.