

From: Steve Davis
To: daniel.jorjani@sol.doi.gov; Jason Larrabee; Mat.Dunn@spacex.com
Subject: Fwd: Meeting summary
Date: Thursday, January 25, 2018 9:57:51 AM
Attachments: [SOW_Example_012418.docx](#)
[ATT00001.htm](#)

We are about to meet w Ann at DOI building.

Some of these asks make no sense. Chat later?

Begin forwarded message:

From: "May, Peter" <peter_may@nps.gov>
Date: January 25, 2018 at 9:36:10 AM EST
To: Steve Davis <steve@boringcompany.com>
Cc: Ann Navaro <ann.navaro@sol.doi.gov>, "Jorjani, Daniel" <daniel.jorjani@sol.doi.gov>, Jane Labanowski <jane@boringcompany.com>, "Jason Larrabee" <jason_larrabee@ios.doi.gov>
Subject: Re: Meeting summary

Our boilerplate SOW for an EA is attached.

Peter May
Associate Regional Director - Lands and Planning
National Park Service - National Capital Region
1100 Ohio Drive SW, Washington, DC 20242
(202) 619 7025
peter_may@nps.gov

On Wed, Jan 24, 2018 at 5:59 PM, May, Peter <peter_may@nps.gov> wrote:
I will send you an invitation with information and a call-in number.

Peter May
Associate Regional Director - Lands and Planning
National Park Service - National Capital Region
1100 Ohio Drive SW, Washington, DC 20242
(202) 619 7025
peter_may@nps.gov

On Wed, Jan 24, 2018 at 1:16 PM, Steve Davis <steve@boringcompany.com> wrote:
Yes, they can call in...can you please send us the info for where our team should go?

On Wed, Jan 24, 2018 at 11:35 AM, Steve Davis

<steve@boringcompany.com> wrote:

Works for me, thanks...am checking w/ Pascon now...at worst, they can call in.

On Wed, Jan 24, 2018 at 7:27 AM, May, Peter <peter_may@nps.gov> wrote:

Steve can you and your consultant Pascon meet in the NPS regional office on Tuesday January 30 at 830AM?

Peter May

Associate Regional Director - Lands and Planning

National Park Service - National Capital Region

[1100 Ohio Drive SW, Washington, DC 20242](http://www.nps.gov/1100OhioDriveSW/WashingtonDC20242)

[\(202\) 619 7025](tel:(202)6197025)

peter_may@nps.gov

On Tue, Jan 23, 2018 at 12:13 PM, Steve Davis

<steve@boringcompany.com> wrote:

Thanks for meeting earlier...to summarize:

1. Peter to provide scope document
2. Dan, Peter, and Steve to schedule kickoff meeting. I am in LA from 2/2 until 2/12, so hopefully before then; I can also call in if remote and have other team-members attend.
3. TBC to provide updated construction plans with spurs by Thursday
4. In addition to NEPA, in Paragraph 3 of Page 3 of the NPS letter, NPS mentioned additional concerns w/ the legal description. Bob V. said Peter would be able to tell us what these were, as our team is not aware of any deficiencies. Peter, can you please help clarify?

Did I miss anything?

Thanks,
Steve

Scenario 1: NPS as Lead Agency

Attached is a generic example of a scope of work for NEPA/NHPA Section 106 compliance in the event that the National Park Service is the lead federal agency for the compliance related to the proposed Hyperloop. Other agencies with federal decision making authorities will need to be identified and would likely serve as cooperating agencies. NPS and applicant would present materials during public scoping. The EA (if it is determined the correct NEPA vehicle) would then present the current conditions, as well as proposed alternatives, and the impacts associated with those alternatives. As stated earlier, this is a generic and those studies that would be required to inform the impact analysis still need to be determined.

Scenario 2: Other Federal Agency as Lead Agency

In the event that a Federal Agency with expertise in transportation takes the lead, the EA would be prepared according to that agencies particular NEPA guidelines. NPS would serve as a cooperating agency and would work closely with that agency to ensure that their NEPA documentation could be easily adopted. The NPS may adopt another federal agency's EA as the basis for a FONSI and decision on an NPS action if it covers the NPS action and the NPS independently reviews the existing EA and determines that it meets all NEPA requirements applicable to the NPS (e.g., the CEQ and DOI NEPA regulations, DO-12, etc.). We would use an interdisciplinary approach to determine the applicability and adequacy of the existing EA in relation to the NPS federal action. If the NPS elects to adopt an existing EA, it must prepare and approve its own FONSI and must notify the public of the availability of a FONSI once it is signed (516 DM 1.2; 46.305(c)).

EXAMPLE - NOT FOR USE

EXAMPLE SCOPE OF WORK FOR THE DEVELOPMENT OF AN ENVIRONMENTAL ASSESSMENT FOR PROJECTS ON LANDS ADMINISTERED BY THE NPS

I. PROJECT TITLE(S):

*Environmental Assessment (EA) and Preparation of Section 106 of the
National Historic Preservation Act (16U.S.C 470f) for:*

The National Park Service (NPS) proposes to **[INSERT BRIEF PROJECT
DESCRIPTION HERE]**.

II. PURPOSE

- A. Provide Title I architectural and engineering (A/E) services to provide the necessary expertise, equipment and other related services needed for the preparation of an environmental assessment (EA) and Section 106 consultation for the **[Project Name]**.
- B. Prepare and coordinate the preparation of EA documents and associated actions and remedies that fulfill National Environmental Policy Act (NEPA) regulations found in DO-12 [\[https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf\]](https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf). The contractor shall prepare a draft EA for internal National Park Service (NPS) review, make appropriate revisions according to NPS and partners' review comments, distribute the completed environmental assessment for public review and prepare the appropriate decision document(s).
- C. The work also includes the facilitation and materials preparation for public scoping and National Historic Preservation Act (NHPA) Section 106 consulting parties meetings, which would be held during a minimum 30-day public scoping period. Some of these meetings will be coordinated with the community outreach meetings associated with the planning/design effort. It is anticipated that this process will include one joint NEPA/NHPA scoping meeting, and an additional public meeting to present alternatives, for a total of two meetings. **[This is subject to change, different projects call for different levels of public input.]**
- D. Prepare the assessments of effect and coordinate the preparation of Section 106 of the National Historic Preservation Act (U.S.C 4701) compliance documentation. Determine and evaluate any adverse effects to the historic landscapes and structures by the proposed actions. The assessment may include a recommendation for No Adverse Effect or No Historic Properties Affected and avoid an Adverse Effect assessment. If a proposed action results in an Adverse Effect assessment, recommended mitigation activities should be provided.
- E. Identify and coordinate participation and review with all relevant Federal and State agencies and organizations, as mandated by Section 106 of the National Historic Preservation Act and other relevant laws, as well as the Commission of Fine Arts (CFA) and the National Capital Planning Commission (NCPC) as necessary. **[Coordination with CFA and NCPC dependent upon location.]**
- F. If required, the Contractor shall prepare a draft and revised Memorandum of Agreement (MOA) for the DC Historic Preservation Officer (SHPO) and, if necessary, the Advisory

- Council on Historic Preservation (ACHP). Or, if required, the Contractor shall prepare a draft and revised Programmatic Agreement (PA) for the SHPO and, if necessary, the ACHP.
- G. Perform all necessary technical analyses to establish baseline information and to assess environmental impacts, edit documents, prepare graphics, and provide products for public distribution and review. Work also includes communication and coordination activities such as bi-weekly or monthly conference calls and participation in review meetings to facilitate the necessary compliance required by NEPA regulations. **[For proposed Hyperloop, NPS would require a detailed socio-economic study looking at the impacts of communities neighboring the B-W Parkway.]**
- H. EA documentation, including the final EA, will be posted by park staff for public comment on the NPS Planning Environmental and Public Comment website (PEPC). It is the desire that the EA will result in a Finding of No Significant Impact (FONSI). The Contractor shall maintain an Administrative Record. The Administrative Record shall be chronological, organized and complete. See the following website regarding what should comprise the Administrative Record. <https://www.nps.gov/subjects/nepa/policy.htm>
- I. The Contractor shall provide all materials, supplies, supervision, coordination, and management necessary to complete the work. The Contractor shall perform all necessary technical analyses, edit the documents, prepare graphics, and perform other work as required to produce the products as specified in this scope.

III. PROJECT DESCRIPTION, BACKGROUND AND JUSTIFICATION

- A. For this project, NPS **[Describe NPS's proposed federal action]**. This project will result in NEPA and NHPA Section 106 documentation that identifies and examines the impacts of each of the various alternatives on park resources and visitor experience. After the completion of an EA, planned work includes:
- i. **[NPS would provide an easement beneath the B-W Parkway in exchange for land for the purposes of constructing the Hyperloop];**
 - ii. **[Continue list of proposed actions covered within the EA.]**

IV. CODE REGULATIONS AND STANDARDS

- A. The qualifications of all the supervisory staff for this study must meet the Secretary of the Interior's Professional Qualification Standards (48 FR 44738-9; 36 CFR Part 61, Appendix A) for their appropriate disciplines.
- B. All work shall be technically and legally defensible and in full compliance with the following requirements: (not in order of priority)
1. The National Environmental Policy Act of 1969 (NEPA), as amended, and the Council on Environmental Quality's regulations for implementation (40 CFR 1500-1508);
 2. The NPS Director's Order 12, Conservation Planning, Environmental Impact Analysis, and Decision Making, and the associated Handbook for Environmental Impact Analysis;
 3. Section 106 of the National Historic Preservation Act, as amended, and the Advisory Council on Historic Preservation's regulations for implementation (36 CFR Part 800); and
 4. The NPS Director's Order 28, Cultural Resource Management, and the associated Cultural Resource Management Guideline.

- C. The EA should address how the proposal, and each alternative as needed, address the requirements of the following: (not in order of priority) [List varies by project type.]
1. The Americans with Disabilities Act (ADA 28 CFR Part 36) Accessibility Guidelines for Buildings and Facilities; Architectural Barriers Act (ABA) Accessibility Guidelines;
 2. Archeological Resource Protection Act, 1979 (ARPA);
 3. Migratory Bird Treaty Act of 1918, as Amended 1989, and the NPS and U.S. Fish and Wildlife Service Memorandum of Understanding to Promote the Conservation of Migratory Birds (2010);
 4. Endangered Species Act of 1973;
 5. NPS Organic Act of 1916;
 6. Energy Independence and Security Act of 2007; and
 7. Wetlands Statement of Findings (DO #77-1) / Floodplains Statement of Findings (DO #77-2)
- D. In addition, the Environmental Assessment shall be consistent with the outline provided in *EA ATTACHMENT*.
- E. Also, the FONSI shall be consistent with the example provided in *EA ATTACHMENT 2- Example FONSI*

V. SCOPE OF SERVICES – TITLE I: ENVIRONMENTAL ASSESSMENT / NHPA SECTION 106/ and FONSI (as appropriate)

A. Task One – Initiate Environmental Assessment (EA) Activities:

1. The Contractor shall participate in an initial project meeting (kick off meeting) and site visit. NPS will schedule this meeting. The purpose will be to introduce the team members, to discuss the purpose and objectives of the project, and to identify information needs. The Contractor shall gather information from NPS staff and other sources regarding previous plans and the affected environment, which includes NPS park resources, visitor experience, existing park conditions, and other data required to prepare the EA. The contractor shall prepare written meeting minutes that include action items identified along with responsible parties. Meeting minutes shall be forwarded to attendees within seven (7) calendar days of meeting. Based on the meeting, the contractor shall create a schedule. The Contractor shall start the Administrative Record when the EA activities begin.

B. Task Two - Project Administration

1. Conference-call meetings:
 - a. Conference call meetings will be the meeting of choice. Also included in this scope of work are communications and coordination activities such as emails, meetings, and conference calls as required by NPS to facilitate project progress and completion during each task and subtask listed below.
 - b. The contractor shall participate in monthly conference calls (up to one hour in duration) and provide summaries of the calls. NPS shall be responsible for setting the agenda and facilitating these calls.

2. Project Plan/Schedule
 - a. A draft project schedule will be prepared by the Contractor within two weeks of Contractor receipt of the Notice to Proceed.
 - b. The schedule shall include the deliverables as identified in the Scope of Work, review periods for NPS, and other important milestones as identified below in deliverables section. The Contractor shall make the necessary changes to the draft schedule to produce a final schedule.
 - c. The Contractor shall be responsible for revising the final schedule on a quarterly basis and upon the request of NPS to reflect changes to the overall project schedule.
3. Progress Reports
 - a. The Contractor will prepare and submit monthly progress reports to the NPS.
 - b. Each report will outline task accomplishments, meetings held, and deliverables, expected activity for the next period, and problems and their disposition for the previous period. Progress reports will be documented in a format which will be approved by the NPS prior to submission of the first report.
4. Prepare communications plan
 - a. Outline how the park will communicate with the public and relevant stakeholders (i.e. via PEPC, press release, social media, printed materials, etc.).
 - b. Establish timelines for internal communications.
 - c. Be concise (a few pages) and should identify topics such as scoping, comment periods, required meetings, and public information materials.
5. Correspondence
 - a. The Contractor will draft all correspondence materials for NPS signature (e.g. public scoping letter, ESA Section 7 and NHPA Section 106 consultation letters, notice of availability letters, press releases, and any other required correspondence).
 - b. All draft correspondence materials will be provided for review and approval by the NPS no later than fourteen (14) calendar days prior to distribution.
 - c. All correspondence will be reviewed by the NPS and distributed on NPS letterhead with the appropriate NPS signature.

All comments collected by hardcopy (i.e. public scoping comments and comments on draft EA) will be uploaded into PEPC by the Contractor.

C. **Task Three – Phase IA Archaeology and Geomorphology background [As Needed]**

1. The APE for archaeological/geomorphological resources is assumed to include the Study Area.
2. The Contractor will perform a detailed review of all previous archaeology, geomorphology and geoarchaeology investigations and studies performed to date within and adjacent to the project area.
3. The Contractor will prepare a draft and final Phase IA archaeology and geomorphology reports that summarize all previous archaeology, and geomorphology/ geoarchaeology

investigations. The report will synthesize a detailed land-use history and context of the study area, and discuss the landscape changes completed to construct the aquatic gardens. If needed, a more detailed GIS-based cut-and-fill analysis will be conducted. These data will be used to prepare detailed field strategy and recommendations for archaeological testing, to be reviewed by the DC District of Columbia archaeologist, NPS Regional Archaeologist and the park Cultural Resources Program Manager.

4. The main purpose of the Phase IA report is to identify those locations within the study area that have the potential to contain old, buried, stable land surfaces, and/or locations with historic and/or prehistoric archaeological potential. The archeological history of the development of the aquatic gardens themselves is of particular interest. Such buried land surfaces have the potential for intact, preserved archeological resources and if present will be included in the assessment of effects.
 5. Having identified those locations with high, medium, and low or no potential for intact, old, buried, stable land surfaces and historic and/or prehistoric archaeological potential, recommendations will be made regarding the appropriate field methods and strategies to sample those locations with high and medium potential. Implementation of the reviewed and approved field methods, strategies, and sampling locations will occur in Phase IB.
- D. **Task Four - Phase IB Archaeology and Geomorphology Survey [As Needed]**
1. Upon final approval of the Phase IA report, the contractor shall obtain an Archaeological Resources Protection Act (ARPA) permit for work on National Park Service property in order to conduct any necessary archaeological/ geoaerchology fieldwork. The permit application will be considered an archaeological work plan and will be reviewed by District of Columbia archaeologist, NPS Regional Archaeologist and the park Cultural Resource Specialist. If geoaerchological work is necessary, a professional geoaerchologist/ geomorphologist will assist in preparation of the geoaerchological work plan.
 2. If needed, he Contractor will work with a professional geoaerchologist/geomorphologist to conduct geoaerchological investigations within the APE using a GeoProbe rig, backhoe or similar mechanical excavator, manual sampling equipment, and/or a mixture of these methods, and as approved in the ARPA permit to obtain geoaerchological information for the APE to determine the depth and character of buried soils and landscape surfaces. The tests may comprise direct-push probes, augur cores, shovel tests, and/or backhoe trenches. Disturbance to park landscapes will be minimized.
 3. The test locations will be distributed to sample those locations identified in Phase IA with high and medium potential for intact, buried land surfaces / archeological resources and to avoid existing utility lines and other major features. To the extent possible, the individual tests will be advanced to natural soils. The professional geoaerchologist/ geomorphologist must be on site to direct the geoaerchological investigations, accompanied by a professional archeologist. The geoaerchologist/ geomorphologist will prepare detailed profile descriptions for each soil column in accordance with standard (NRCS, NCSS) techniques and nomenclature for the field description of soils. In addition, the geoaerchologist/ geomorphologist will estimate the age of each buried landscape surface.
 4. The location of all test locations will be recorded using GPS equipment with sub-meter accuracy. Mapping of the test locations will be provided in draft and final formats, and will be provided to the NPS Regional GIS Coordinator. The GIS mapping will not be considered final until it has been reviewed and found acceptable by the National Park

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Service. All data shall be submitted to NPS in the cultural resource data transfer standard in ESRI geodatabase format. A geodatabase template can be downloaded from: <https://irma.nps.gov/App/Reference/Profile/2182526>. This geodatabase template contains all of the various geodatabase objects required to implement the cultural resource spatial data transfer standard data model. The geodatabase contains all of the various cultural resource feature classes defined with the standard, as well as all of the feature level metadata fields and domain values. The data transfer standard contains the minimum fields required but other fields may be added to meet the practical needs of the project, such as but not limited to the following field; the state trinomial site identifier for archeological sites. Refer to the Cultural Resource Spatial Data Transfer Standards guidelines for additional information regarding the structure of the geodatabase and its functionality which can be downloaded from: <https://irma.nps.gov/App/Reference/Profile/2182518>. Each layer must be free of geometry errors, including topological errors, and have a completely populated attribute table. The layers will be projected in the local coordinate system used by the park. The GIS layers delivered to the NPS and the District will be accompanied by FGDC compliant metadata, including but not limited to process steps, attribute descriptions, title, dates, abstract, and purpose. The FGDC Content Standard for Digital Geospatial Metadata Workbook is available for download at <http://www.fgdc.gov/metadata/metadata-publications-list>.

5. Provide a draft and final geoarcheological technical memo, with supporting data that includes a detailed log for each successful soil column. Both reports must also provide a detailed description of the goals, methods, and findings of the study, in sufficient detail on which to base recommendations for further work if warranted. In consultation with the NPS, the need for Phase IB site identification survey of buried soil horizons will be determined. If NPS is satisfied that no additional archaeological survey or testing is needed, the technical report will be used to support compliance with Section 106 of NHPA, and as there are no formal guidelines for geoarchaeological investigations in NPS Director's Order 28 (Cultural Resource Management Guideline) or in the District's Guidelines for Archaeological Investigations in the District of Columbia, 1998, as amended, the technical report must contain a brief overview of the landscape history of Poplar Point and Anacostia Park, with sufficient illustrations and narrative text to provide a context for interpretation of the field results.
6. If Phase IB archaeological site identification survey is warranted based on the Phase IA and/or geoarchaeology results, the Contractor will prepare a work plan for Phase IB identification survey in consultation with the NPS. All work will be conducted in accordance with the District's Guidelines, 1998 as amended, and in accordance with the ARPA permit. A management summary will be completed describing the results of the survey and preliminary recommendations. The need for Phase II evaluation survey and/or additional Phase IB testing will be determined in consultation with the NPS and the City Archaeologist based on recommendations presented in the management summary.
7. If no additional survey is needed, then draft and final full Phase I technical reports of the survey results shall be completed in accordance with the District's Guidelines, 1998 as amended and NPS standards described above. Any new geoarchaeological data will be summarized in the body of the report and the full geoarchaeological technical memo will be included in the report as an appendix.

8. Should NRHP eligible or potentially eligible resources be identified, the Contractor will make recommendations for Phase II NRHP-evaluation testing, and propose a work plan to complete the investigations in consultation with the NPS.
 9. The ARPA permit will need to be extended to cover the additional investigations. Locations of all tests will be recorded per NPS standards described above.
 10. Completion of draft and final combined Phase I-II technical reports will be completed in accordance with the District's Guidelines and NPS standards stipulated in the ARPA permit.
 11. At the completion of the fieldwork, any recovered artifacts will be analyzed, along with any other data collected in the field. The contractor will process the artifacts and accompanying field notes, records, maps, photographs, and any other forms of original documentation, for curation at the NPS/NCR Museum Resource Center in Landover, MD, according to NPS standards stipulated in the ARPA permit.
 12. At the completion of the survey, archaeological resources will be documented on NPS ASMIS site forms including recommendations on NRHP eligibility or potential eligibility will be prepared. All recommendations will be provided to the NPS prior to submittal to the DC SHPO in order to obtain site numbers for DC State Site Survey forms.
 13. Contractor will consult with NPS regional and park archeologists and the City Archaeologist before draft and final sites forms are submitted to DC HPO.
 14. If the Assessment of Effects determines that the undertaking cannot avoid causing adverse effects to eligible or potentially eligible resources, consultation with the SHPO and NPS will be needed to determine appropriate mitigation treatment(s) and codified in a Memorandum of Agreement (MOA). Potential mitigations include but are not limited to Phase III data recovery archaeological excavations. No Phase III investigations will proceed without SHPO and NPS consultation and an additional ARPA permit.
- E. **Task Five – Conduct Public Scoping**
1. The Contractor shall draft all public scoping communication materials for NPS signature (i.e., public scoping letter, NHPA Section 106 consultation letters, press releases, and any other required correspondence). All draft correspondence materials shall be provided for review and approval by the NPS no later than fourteen (14) calendar days prior to mailing.
 2. Public scoping meeting – contractor will prepare 5-10 presentations boards with alternatives, maps, etc. for a public meeting during the beginning of the scoping period. Contractor will attend the meeting, along with NPS staff, and a short presentation will be held, followed by an "open house" for the public and all interested parties.
 3. After a minimum 30-day public scoping period the contractor shall be responsible for maintaining a separate record of the comments received during the public scoping. The contractor shall enter all written comments into PEPC. The Contractor shall prepare a scoping report following the meetings that outlines the scoping process and all comments received. This will be submitted via email within ten (10) calendar days after completion of the public scoping period.
- F. **Task Six – Endangered Species Act of 1973 (as amended) Section 7 consultation**

A. Consultation Process

1. In coordination with NPS, the Contractor shall draft a formal letter initiating consultation for Section 7 of the Endangered Species Act (ESA) with the U.S. Fish and Wildlife Service. A letter is needed, because the long-eared bat does not show up on the website.
2. The Contractor shall prepare all subsequent correspondence to the U.S. Fish and Wildlife Service and Maryland Department of Natural Resources, as determined necessary throughout the consultation process.

Task Seven – Alternatives Development and Refinement [As Needed]

1. The contractor will develop a range of alternatives would most effectively address the purpose and need of the project and develop alternatives that are most appropriate for further analysis. The Contractor will document all alternatives that have been considered and dismissed, with the rationale for their dismissal.

Task Eight – Section 106 Consultation

1. Following the refinement of the alternatives to be considered in the EA (Task 4), the Contractor shall develop a report that analyzes the impacts of the alternatives on cultural resources and submit it to NPS for review (Assessment of Effects) prior to holding a Section 106 consultation meeting. In addition, the Contractor shall finalize the Area of Potential Effects (APE) and list of significant cultural and historic resources within the APE, based on the comments from consulting parties following the first public meeting. The Contractor shall also prepare a meeting notification for consulting parties. Meeting and public communication materials shall be provided to the NPS for review and approval by the NPS no later than fourteen (14) calendar days prior to the meeting date.
2. If needed, the Contractor shall facilitate a second Section 106 consultation meeting with consulting parties to present and discuss the impact analysis report. This meeting shall occur during EA development so that the findings may be included in the Cultural Resource section of the EA. NPS will be responsible for obtaining a meeting space. The Contractor will upload all comments collected as well as meeting minutes/results and attendance lists into PEPC within ten (10) calendar days after the meeting.

Task Nine - Floodplains and Wetlands Statement of Findings [As Needed]

1. In accordance with Executive Order 11988 (Floodplain Management) and Executive Order 11990 (Protection of Wetlands) and NPS RM77-1 and 77-2, the Contractor will evaluate impacts to wetlands and floodplains and coordinate with the NPS Water Resources Division to prepare a Statement of Findings, if necessary.

Task Nine.X – Other Required Studies [As Needed]

1. [Scope out and cost any additional studies required to determine the impacts associated with the proposal. In this case a fairly robust socio-economic study.]

Task Ten – Prepare the EA

1. The Contractor shall develop and prepare the Environmental Assessment using the EA ATTACHMENT 1- Environmental Assessment Outline as a starting point. The EA shall contain a brief discussion of the purpose and need for the proposal, alternatives to the proposal, the environmental impacts of the proposed action and alternatives, and a list of agencies and persons consulted.

2. The Contractor shall prepare the EA and related compliance documentation for two or three NPS reviews and submittal of final documents. The Contractor shall prepare responses to review comments on all deliverables and submit these to the NPS for approval before incorporating changes into subsequent versions of the documents. The first review will be park- and region-wide, and take 30 days. The Contractor will use track changes to submit a second draft, which will require a shorter time frame. If needed, there will be a third review, or a “permission to print” the EA.
3. The Contractor shall prepare the EA in full compliance with the requirements of the National Environmental Policy Act of 1969, as amended; the Council on Environmental Quality Regulations (40 CFR 1500-1508); and the National Park Service NEPA Compliance Guideline (DO-12).
 - a. The Contractor shall prepare all necessary graphics.
 - b. The Contractor shall follow the NPS format for EA
 - c. The Contractor shall deliver a complete technically adequate, edited internal review draft EA for NPS review.

K. Task Eleven – Release the EA

1. The Contractor shall prepare and submit a press release and a Notice of Availability (NOA), stating that the EA is available for review and comment by stakeholders, to the park superintendent for signature at least two weeks prior to the release of the EA.
2. NPS will distribute the signed NOA letters and EA to stakeholders and for public review via email and, where appropriate, by hard copy. NPS will also post the EA on the Planning, Environment and Public Comment (PEPC) website.
3. The NPS will issue news releases, a 3-week out report, directly distribute and make available to the general public copies of the EA. There will be a 30 calendar day public comment period following the release of the EA. The Contractor, in coordination with the NPS, will use the PEPC program to receive, post and analyze public comments received during the comment period, and will submit a comment summary, with suggested responses, to NPS within ten (10) calendar days of the close of the comment period. Contractor shall enter hardcopy public correspondence text into PEPC.

Task Twelve – Complete Section 106 Consultation

1. If needed, the Contractor shall facilitate a Section 106 consultation meeting with consulting parties to discuss the mitigation measures that have been proposed in the EA under the preferred alternative, and the appropriate mechanism for formalizing them (i.e., through the FONSI, or more formally via an MOA or PA). This meeting will occur after the EA has been released. Meeting and public communication materials shall be provided to the NPS for review and approval by the NPS no later than seven (7) calendar days prior to the meeting date. Submit meeting minutes and summary of comments within 14 days of the meeting.
2. If another meeting is needed, the Contractor shall submit a draft MOA or PA, if necessary, within fourteen (14) calendar days of the meeting (only if needed) for review by consulting parties. If the consulting parties determine an MOA is not needed, the Contractor shall prepare an Assessment of Effect letter to SHPO and ACHP and provide to NPS for signature and distribution within 7 days. The

document will be reviewed by consulting parties and the Contractor shall make any necessary revisions based on their comments.

Task Thirteen – Prepare Finding of No Significant Impact (as appropriate)

1. The Contractor shall submit the draft FONSI for NPS review and comment within fourteen (14) calendar days of the EA comment summary report. This date may be adjusted based on the status of Section 106 consultation. The Contractor shall re-submit the finalized FONSI to NPS, addressing any comments.
2. If the EA results in requiring a Notice of Intent (NOI) and subsequent Environmental Impact Statement (EIS), notify the NPS in writing, prepare a detailed explanation as to why and draft the NOI for NPS review and comment. Based on the outcome of the EA, the requirement for an EIS will be evaluated and potentially addressed as a modification to the scope of work.

Task Fourteen – Administrative Record and Final Submission

1. Submit all Final Deliverables.
2. The Contractor shall maintain the administrative record for all documents it creates or receives. The Contractor shall ensure consistency between staff members in collecting, logging, and tracking documentation related to the project. The record shall be maintained throughout the project and available upon request by NPS within 3 business days. The Contractor shall complete and provide NPS with the administrative record within fourteen (14) calendar days of the execution of the FONSI.

