Project Record Dos and Don'ts

Read and follow at the BEGINNING of the project

First and foremost

- Start every file name with YYYYMMDD_Author_Subject_DocType.
- Do not file the same document in more than one place.

Meeting notes, conversations, telephone calls and emails

- EVERY record needs to include name, title and affiliation of the participants, including <u>your</u> name, title and affiliation (BLM), the date, and a brief description of information exchanged and topics covered, especially if any agreements were made. Assume the reader is not from this office.
- Include relevant notes from IDT meetings as well as meetings/calls with tribes, the SO/WO, solicitor, general public, project proponent, contractor, et cetera. Handwritten notes are not appropriate in the record. Nor are personal notes of meetings if they were not circulated and accepted by those present.
- **Special note to managers:** This includes you, too! Document pertinent conversations with tribes, other managers, county commissioners, the general public, etc. Include date, names, titles, affiliation, and a summary of the conversation. If you don't have time to type this information up, call the Team Lead and leave a message with this information and they will transcribe it and get it into the project record.
- Combine meeting agendas and meeting notes with the names of meeting participants in one document.
- Include all formal recommendations and directions from Area Managers, IDT leaders, or other entities, and all formal requests for such recommendations or directions.
- Save emails if they include important direction from managers, or conversations that have a bearing on the decision.
- Emails and their attachments can be saved together in one PDF only if both (or neither) are privileged documents. If it is a mix, save them as separate PDFs, but make sure it is clear they are related (e.g., title one as XYZemail and the other as XYZemail_attchmt).
- Calls/emails to set up meetings do not need to be recorded.
- Keep it professional: Do not forward a letter from the public to another IDT member and say, "this guy is off his rocker, check out his comments!"
- Don't put your favorite quote or photo at the bottom of every one of your emails. Dealing with these "cute" personal touches adds length to documents and often adds time for the people compiling the record. It is a waste of government resources and it looks tacky in the record.

Photos and references

- Add a cover page describing the author (name, title, affiliation), location and relevance of ALL photos. Without cover page, photos are worthless; just delete.
- Put four photos/slides on a page, change to grayscale if possible.
- Make sure page 1 of powerpoints lists who made the presentation (name, title, affiliation), to whom (group name and/or list of names, titles, affiliations) and when.
- Delete photos and powerpoints if not needed for the record.
- HINTS re photos → S:\NEPA\Guidance\ProjectRecord&Appeals\Photos+PageNumbering.
- Include all documents referenced, including other NEPA documents, RMPs, or decisions.
- Don't cite entire books! List the specific pages you used.
- If you reference an internet page, save it as a PDF the day you access it. Internet pages change and just saving the web address does not guarantee you will be able to get a PDF of the internet page at a later date.

Draft and final documents

- Keep if it is clear that the draft was used in the planning/decision-making process.
- Keep drafts if they contain comments that affect the decision and/or planning process.

- Do not include working drafts or edited versions of documents or chapters, or draft documents containing only technical edits (spelling, minor content changes, grammar, etc.).
- List date of preparation or circulation in the document itself, not just in the electronic title. List preparer name, title, affiliation in the document. Include this on specialist reports, maps, excel spreadheets, etc.
- Delete unneeded drafts early and often. Don't wait until the Decision is signed!
- Include all announcements for public participation activities including a copy of the announcement, the date of the announcement, the medium or source used to make the announcement (i.e. newspaper, magazine, radio), the area of circulation, and a copy of the announcement as published in each source.
- Include published EA, FONSI, Decision Record, and any maps, charts, summaries, forms or other documents made publicly available with these documents. Include any circulation or mailing lists.
- Include final computer runs used in the analysis. Do not need to include preliminary computer runs which were not used in the final decision-making process.
- If absolutely necessary, documents can be CREATED and added to the record to explain or clarify confusing entries, rewrite an illegible document, or explain missing items.
- As much as possible, use 8.5" x 11", black and white, margins 1" or more and font size 11 point or larger.

Appeals

Once we receive notice of appeal, we have 10 business days to convert the **project record** to an **Administrative Record** and send it to IBLA. This means the notice CAN'T be routed around for five days or sit on someone's desk while they think about a strategy. Even if the project record is small and in great shape there is just too much work for the remaining five days.

- Managers, please hand-deliver the notice of appeal to Teal as soon as it arrives. She can help get the ball rolling by calling the SO appeals liaison and solicitor, and giving the ID Team Lead hints on how to proceed with the rest of the steps.
- The PROJECT LEAD is in charge of compiling the project record and converting it to an Administrative Record. The list below includes some but not all steps.
- Read the "Administrative Record Toolkit" (SO prepared it in 2010) located at Teal's desk.
- Go to the electronic record and reduce the number of subfolders.
- Delete duplicate records.
- Make sure all relevant files are in the record. Scan hardcopies, find references on web, etc.
- Open each file and make sure it follows the dos and don'ts from above, and is in the correct folder.
- Convert every document in the record into a text-recognized PDF. If there is any chance the decision will be appealed, do this BEFORE you issue the decision, before you get an appeal, since it can take a while.
- Add document number. This must be in the document itself, either applied as Bates numbers throughout document (a range), or inserted as a text box on bottom right of first page of each document.
- Create an index that has these fields for each document: a) number (or a range of Bates numbers), b) date, and c) description (including whether document is privileged). Even if the file title has the date and a description in it, these need to be separate fields on the index. And folder number if applicable. Fill in the index fields.
- Send draft index, key documents and potentially "privileged" documents to solicitor.
- Save to CDs and send final index and all but privileged records to IBLA, appellant and solicitor.

NOTE: There are additional Records standards regarding what hardcopies we need to keep in central files and for how long. Chris Hamlin tries to keep us legal on those! See him for details.