

Suggested NEPA Milestones

Suggested NEPA Milestones		Month 1				Month 2				Month 3				Month 4				Month 5				Month 6				Month 7																			
		Weeks																																											
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28																
NEPA Review																																													
File Reviews / Database Queries	SHPO File Review, IPaC & Dkeys, state species lists, etc.																					30 days																							
Supporting Document Prep	Arch. Or Species Desktop Reviews, field survey reports (as needed), etc. * The estimated days may vary dramatically depending on the need for field work, involvement of other federal agencies (with their own requirements), and time of year restrictions if field work is needed.																					60* days																							
SHPO Submission Draft	NTIA intends to use the ACHP Program Comment whenever possible, the submission should include the NTIA's APC Form and appropriate supporting documentation.																									30 days																			
SHPO Review Period	SHPO has 30 days in which to respond to the APC Form or Section 106 submission.																																30 days												
USFWS/NMFS Review Period	USFWS does not have a regulated review period, but typically takes between 45 and 60 days. Depending on capacity, some regional offices may take longer to review.																									45 - 60 days +																			
Tribal Consultation	Many tribal groups will want to see the SHPO submission package, so their 45 day consultation shot clock would start when the package is submitted to SHPO.																																	45 days											
Final CATEX Draft	The Final Draft will compile the results of all coordination efforts and may be reviewed by the SBO prior to submitting to the ESAPTT System for NTIA approval.																																	30 days											
Final CATEX Review Period	The NTIA has committed to 14 day reviews for NEPA Decisions.																																									14 days			

Other NEPA or Permitting Items

		Est. Days
Initial EC Screen	EBI strongly recommends conducting an initial EC Screen to identify potential challenges that can be addressed through revised project design before beginning the NEPA screen.	
EC Screen	EBI will review ECs related to environmental and historic preservation and provide both general and location-specific recommendations for mitigation or avoidance. EC Screens can be	30
Revise Project Design	The subgrantee may refine the project design (such as modifying the route or changing construction methods).	30
Re-screen Design Changes	Rescreening the design changes ensures there are no unmitigated issues within the project area ahead of the NEPA screening process. Addressing issues early through design and best management practices helps facilitate a smoother, more efficient NEPA review.	30
Field Surveys	Field surveys may not be required for NEPA completion, but if they become necessary, they will extend the NEPA timeline.	
Archaeological Survey	The extent of survey needs to be determined based on the results of the ADR, but may include pedestrian survey, shovel tests, or full Class III.	30-60*
Cultural Resources Survey	Site visit to photograph and assess "above ground" historic resources within a visual APE.	21*
Species Survey	Desktop species review is the preferred method, but field assessments may be required for certain sensitive species. Alternatively, pre-construction surveys or construction monitoring requirements may satisfy the survey needs.	30*
Wetland Delineation	Typically required for permitting as opposed to the NEPA Review.	21-30*
Paleontology Survey	For projects involving the BLM in certain sensitive regions, paleo surveys may be required either as part of the NEPA review or as pre-construction requirements.	30-60*
*Note on timing: Arch. and Paleo. Surveys on federal lands will require Fieldwork Authorizations and/or Use Permits. Additional time may be required for the administrative agency to process these documents. Timing varies widely between agencies and even across an agency's field offices. All times are additionally impacted by time of year restrictions. All estimates are approximate based on ideal conditions.		
Permitting	EBI recommends discussing permitting requirements with the SBO and setting pre-consultation meetings with permitting agencies <i>early</i> . While permitting does not need to be complete to wrap the NEPA review, many of the NEPA supporting documentation may be utilized in permit applications. Understanding where the two intersect will be critical for efficient project reviews/approvals. Examples of possible permitting include: Section 10 Navigable Waters, Section 401 Water Quality Cert., NPDES/Stormwater, Waterway Encroachment, Air Quality or Dust Control, etc.	

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NEPA Review - Components Impacting Section 106 Review (SHPO)																													
File Reviews / Database Queries	SHPO File Review, Arch. Site File Review, etc.	30 days																											
Supporting Document Prep	Arch. Desktop Reviews, field survey reports (as needed), etc. * The estimated days may vary dramatically depending on the need for field work, involvement of other federal agencies (with their own requirements), and time of year restrictions if field work is needed.					60* days																							
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NEPA Review - Components Impacting Section 7 Review (USFWS/NMFS)																													
File Reviews / Database Queries	IPaC & Dkeys, state species lists, etc.	30 days																											
Supporting Document Prep	Species Desktop Reviews, field survey reports (as needed), etc. * The estimated days may vary dramatically depending on the need for field work, involvement of other federal agencies (with their own requirements), and time of year restrictions if field work is needed.					60* days																							
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