

# **Performance Work Statement for the Coastal Oil and Gas Leasing Program And Environmental Impact Statement**

## **1. BACKGROUND AND PURPOSE**

The Bureau of Land Management (BLM) is preparing an Environmental Impact Statement (EIS) for the Coastal Plain Oil and Gas Leasing Program for the U.S. Department of the Interior (DOI) as directed by Title II, Section 20001 of the Tax Cuts and Jobs Act of 2017 (Tax Act).

The BLM is undertaking a Coastal Plain Oil and Gas Leasing EIS (Leasing EIS) to implement the leasing program consistent with the Tax Act. The Leasing EIS will serve to inform BLM's implementation of the Tax Act, including the requirement to hold not fewer than two lease sales area-wide and to permit associated post-lease activities, including seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain. Specifically, the Leasing EIS will consider and analyze the potential environmental impacts of various leasing alternatives, including the areas to offer for sale, and the terms and conditions (i.e., lease stipulations and best management practices) to be applied to leases and associated oil and gas activities to properly balance oil and gas development with existing uses and conservation of surface resources, and to limit the footprint of production and support facilities on Federal lands to no more than 2,000 surface acres. The lands comprising the Coastal Plain include approximately 1.6 million acres within the approximately 19.3 million-acre Arctic National Wildlife Refuge.<sup>1</sup>

The BLM will work collaboratively with interested parties to identify the management decisions best suited to local, regional, and national needs and concerns, as well as to develop a proposed action and alternatives consistent with the following criteria:

- The EIS will consider all Federal lands and waters within the Coastal Plain;
- The EIS will address oil and gas leasing and will use scoping to identify issues; impacts and potential alternatives to be addressed;
- Under the Tax Act, not fewer than two lease sales, each to include not fewer than 400,000 acres area-wide of the areas with the highest potential of hydrocarbons, must occur by December 2024;
- The BLM will consider subsistence resources and users, as well as potential actions to minimize adverse impacts to subsistence in accordance with section 810 of the Alaska National Interest Lands Conservation Act (ANILCA); and
- The EIS will appropriately consider the surface management of the Coastal Plain.

Future on-the-ground actions requiring BLM approval, including proposed seismic and exploration plans or development proposals, would require further National Environmental Policy Act (NEPA) analysis based on specific and detailed information about where and what kind of activity is proposed. Additional site-specific terms and conditions may be required by the Authorized Officer prior to authorizing any oil and gas activity.

Upon completion of a Record of Decision (ROD), the BLM intends to conduct lease sales in accordance with the Tax Act.

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<sup>1</sup> The Coastal Plain area has also been commonly called the 1002 area.

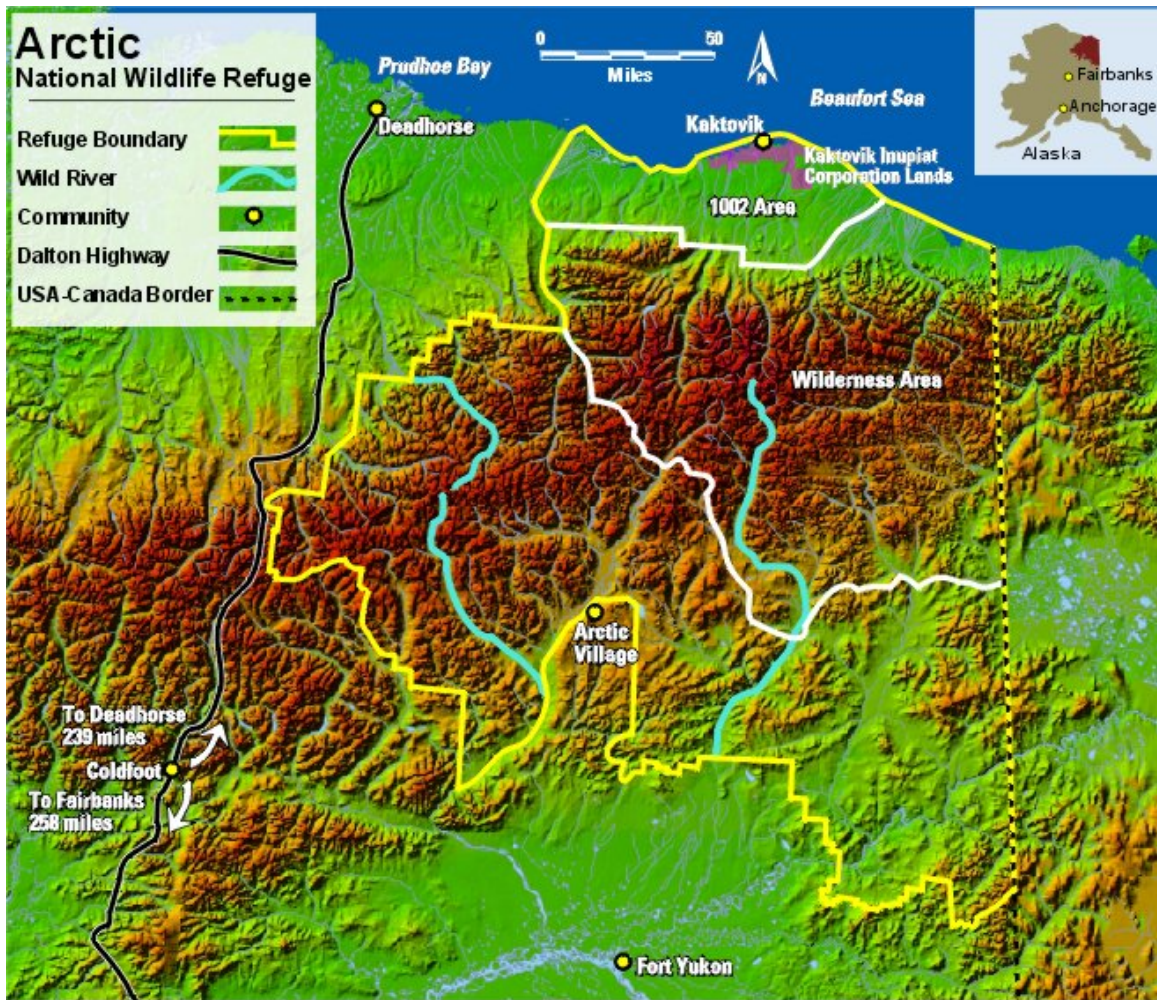


Figure 1. Location of the Coastal Plain (1002 Area) within the Arctic National Wildlife Refuge. (Source: Refuge Map from <https://www.fws.gov/refuge/arctic/map.html>).

## 2. OBJECTIVE

The scope of work for the Leasing EIS area is presented as seven task areas in the following sections:

- (1) Develop Project Management Plan;
- (2) Scoping Meetings and Scoping Report;
- (3) Preparation and Publication of Draft EIS (DEIS);
- (4) Support of Public Review and Comment Response;
- (5) Preparation and Publication of the Final EIS (FEIS);
- (6) Development of the ROD; and
- (7) Create and Maintain the Administrative Record.

A preliminary process, deliverables, and schedule are described here; however, a final process plan, deliverables, and schedule will be identified with BLM during the Project Management Plan phase (Task 1).

The EIS will identify potential impacts that oil and gas leasing could have on the environment and identify appropriate measures to mitigate those impacts. The EIS should meet the standards required under the NEPA and

other relevant laws and regulations. Many readers, including BLM, Tribes, other federal agencies, local and state government agencies, interest groups, and citizens, should easily understand the EIS.

The contractor will be responsible for specific tasks including scoping and scoping report, preparation of a Draft EIS, Final EIS, all associated public involvement activities, ROD, and administrative record.

### **3. SCOPE**

- A. The DOI BLM requires contractor support services to complete an EIS for the Coastal Plain Oil and Gas Leasing Program in accordance with Title II, Section 20001 of the Tax Act, the NEPA of 1969, as amended, and in a manner similar to the administration of lease sales under the Naval Petroleum Reserves Production Act of 1976, as amended. This shall include:
  - 1) Prepare any and all supporting documents and perform studies to comply with NEPA, including organizing public meetings; preparing associated records; and providing collection, analysis and response to public inquiries and comments.
  - 2) Perform subsequent comprehensive analyses for each alternative generated for the planning area and assist with the development of alternatives.
  - 3) Prepare or assist with the preparation of draft and final EIS (Chapters 1-5) and assist in the preparation of Biological Assessments/Biological Evaluations as needed. This shall be done per BLM NEPA streamlining policy and guidelines on document length and project schedule.
  - 4) Prepare or assist with the preparation of any and all analyses and inventories including but not limited to GIS mapping, air quality, vegetation, visual resource management, cultural resources inventories, socioeconomic baseline and analyses, and any resources not identified here as needed.
  - 5) Create and maintain Decision Files and an Administrative Record for the EIS.
- B. Preparation of EIS analysis and documents must comply with:
  - 1) Council on Environmental Quality NEPA Regulations (40 Code of Federal Regulations (CFR) Parts 1500-1508)
  - 2) BLM NEPA Regulations (43 CFR Part 46)
  - 3) Alaska National Interest Lands Conservation Act (ANILCA);
  - 4) BLM National Environmental Policy Act (NEPA) Handbook H-1790-1; and,
  - 5) Other BLM and Department of Interior-related Secretarial Orders, policy and instruction memorandums
- C. Public participation and government-to-government and tribal consultation (including consultation with Alaska Native corporations) is required throughout the process. The EIS process will build upon relationships with tribes, state and local governments, federal agencies, local stakeholders and others in the communities of interest of the plan as normal business. Collaborators and cooperating agencies will be regularly informed and offered timely and meaningful opportunities to participate in the EIS process.
- D. The document will use maps and geospatial information to clearly depict the area resources for both existing and desired management conditions. GIS data and metadata information will be stored in an organized manner and attributed in plain English. GIS data and metadata information will meet Federal Geographic Data Committee standards, as required by Executive Order 12906. All other applicable BLM data standards will also be followed. Care will be taken through templates and symbology to create maps that have a look and feel common to existing BLM and FWS maps.
- E. All proposed management actions will be based upon the best available scientific information, research and technology, as well as existing inventory and monitoring information.

- F. Plan and implement an efficient process with a supporting project schedule to guide collaboration with BLM resource specialists.
- G. Identify and appropriately address substantive public, governmental, and tribal concerns regarding the EIS.
- H. Work with the BLM Project Manager to coordinate the development and assessment, analysis, and proposed decision criteria of this EIS.
- I. Prepare notice of availability for the DEIS.
- J. Prepare notice of availability for proposed the FEIS.
- K. Prepare ROD.

The following site has a catalog of summary reports, inventories, concepts and analysis frameworks completed that should be considered in the development of the EIS: <https://northslopescience.org>

#### **4. PROJECT PHASING**

The project will be broken into the following seven primary tasks:

- (1) – Kick-Off Meetings and Project Management Plan
- (2) – Scoping Meetings and Scoping Report
- (3) – Prepare DEIS
- (4) – Public Comment Meetings
- (5) – Prepare FEIS
- (6) – Prepare ROD
- (7) – Administrative Record

The BLM is responsible for the EIS content and has final control and authority concerning the analytical scope, standards used, products produced, and the schedule. Services performed by the contractor and associated deliverables shall be completed according to the preliminary project schedule as defined by the BLM in section 7 and Appendix A, “Coastal Plain Oil and Gas Leasing EIS Preliminary Schedule” and within budget.

Following a project initiation meeting, the contractor shall refine and elaborate the tasks into a more detailed task list, as necessary, and include this list in the project management plan. This list shall identify staff completion responsibilities and a schedule for completion of individual tasks of core team members.

#### **5. GENERAL RESPONSIBILITIES AND FURNISHED NEEDS**

##### **A. Contractor Responsibilities**

- 1) In order to effectively complete the tasks described below, the contractor must be familiar with all laws, policies, and guidelines related to the development of an EIS. Reviewing these plans, laws, policies, and guidelines may take considerable time for the contractor depending on their past experience with these types of projects. Primary BLM policy regarding NEPA is found in the BLM NEPA Handbook H-1790-1, and various instruction memorandums. Specific to Alaska, ANILCA may also influence management decisions.

- 2) The contractor shall meet with the BLM Contracting Officer's Representative (COR) and other BLM personnel on a regular basis. Consistent communication is vital to producing acceptable documents. The contractor shall include meetings and coordination in the project management plan.
- 3) Conference calls will be set up biweekly or more often, if needed, to ensure effective and timely communication between the BLM Project Manager/COR and contractor, and when necessary, include the interdisciplinary team. Contractor-prepared monthly written progress reports are required and additional conference calls will be set up between the contractors and COR to discuss schedule, status of funds and payments, tasks being worked on, and other issues, as required.
- 4) Create and implement the project management plan, as approved by the BLM.
- 5) The core team shall possess the interpersonal and resource-specific skills to work together effectively as an interdisciplinary team, recognizing the interconnectedness of their respective resource allocation and management decisions across other resources. The core team shall anticipate their workload relative to the issues already identified in existing documents and the preliminary project schedule.
- 6) The contractor shall maintain the official project administrative record in a format approved by the BLM. It shall be organized in a readily accessible manner throughout the project.
- 7) All electronic communications shall be in formats accessible to Agency personnel. Current software versions used by Agency personnel include Microsoft Office 2010 or higher, and Adobe Acrobat version 10 or higher.
- 8) All contractor personnel requiring access to BLM software and/or servers will be subject to BLM's required security background check and required trainings for access. This includes but is not limited to GIS and ePlanning applications.
- 9) All contractor personnel must sign a non-disclosure and confidentiality agreement.
- 10) Publish online, and print hardcopy documents unless otherwise agreed upon.
- 11) Develop written guidance for team members regarding the scope and content of NEPA analysis.
- 12) Prepare all documents and conduct all processes consistent with applicable laws including NEPA, ANILCA, and BLM regulations.
- 13) The contractor shall assist BLM by drafting letters, coordinating meetings, taking meeting notes, and documenting correspondence and meeting notes in the administrative record after review and approval from the BLM.
- 14) BLM will take the lead on all tribal government-to-government consultation meetings.
- 15) The contractor may not host any BLM materials on publicly accessible websites. Any web-based deliverables will be hosted on BLM servers and the BLM ePlanning website already set up for the project. The BLM will post documents to the publicly-available ePlanning website; however, the contractor must provide a version of each document (DEIS, FEIS) that meets the document standards for posting on the EPA's e-NEPA website. The most current document standards can be found here: <http://www2.epa.gov/sites/production/files/2014-01/documents/e-nepa-guide-on-registration-and-preparing-an-eis-for-electronic-submission.pdf>.

#### B. Contractor-furnished Materials and Guidelines

- 1) The contractor shall furnish all personnel, equipment, supervision, transportation, supplies, and incidentals, except those indicated as government-furnished, to perform all work necessary for completion of the EIS tasks in accordance with any delivery/task orders issued. The EIS must be



legally defensible and meet the requirements of applicable laws, regulations, court decisions, and BLM manuals, handbooks, and policy. The “quality standards” beneath each task have been included to provide additional information regarding timing, products, and to help define the desired results BLM needs for this contract.

- 2) If not otherwise stated within the contract, the Cooperating Agency reviews will be concurrent with the BLM Alaska reviews.
- 3) When soliciting or addressing comments from BLM staff, cooperating agencies, and Tribes, the contractor is responsible for providing a written response explaining if substantive comments were incorporated, and, if not, why. Response to substantive comments from the public on the DEIS will be addressed in the FEIS and the contractor will develop the written response in the FEIS. The BLM project manager will be responsible for making the decisions whether to integrate Alaska State Office, Washington Office, cooperating agency, and BLM Alaska comments into the documents. However, the contractor will be responsible for documenting these responses and making the appropriate changes in the document. This should be built into the comment form so it is easy to track. This feedback loop is critical to getting buy-in from the staff and continued participation throughout the various review periods.
- 4) The Contractor shall produce all cartographic products required by the BLM and complete required analysis; therefore, the contractor must have GIS capabilities necessary to meet corporate GIS protocols and standards.
- 5) The contractor shall perform GIS data analysis and map production for Chapters 1, 2, 3, and 4 of the Leasing EIS. Each chapter will require map and data presentation to provide: land status and lease area boundaries in Chapter 1; comparisons among the range of alternatives in Chapter 2; to present the existing condition and resource inventories in Chapter 3; and, to present the impacts analyzed in Chapter 4. The contractor shall perform GIS data analysis and map production for maps needed for alternative development, analysis of impacts, internal briefings, and public meetings.
- 6) The contractor shall catalogue and prepare GIS data for the administrative record to ensure that all administrative record data is organized in a cohesive manner. The BLM will provide the data in the required format and at prescribed intervals, as agreed upon by BLM and the contractor during the post-award conference.
- 7) The contractor must also provide metadata and process steps to ensure repeatability.
- 8) The contractor shall be responsible for protecting all information used, gathered, or developed as a result of work under this contract. The contractor shall protect all sensitive but unclassified government data. The contractor shall not make copies, screen shots, or save sensitive but unclassified government data to be removed from the physical premises without explicit written permission from the BLM COR. All information, work papers, drafts, and final documents developed or accessed, or any product/system developed are the property of the United States Government.
- 9) The contractor shall identify a core team that consists of individuals that meet or exceed the experience criteria as described under the “Project Management” section under “Task 1.” The BLM understands that the position titles listed in this document may not reflect the contractor’s labor categories. The contractor shall provide a “description” of labor categories in the proposal that will allow BLM to understand if the individual meets the criteria. A resume or appropriate background information will be provided for each proposed core team member. The contractor cannot replace core team members, as identified in the proposal, during the performance of the contract without prior approval by the Contracting officer. (Task 1- Project Management Plan).

#### **C. BLM-furnished Materials and Services**

- 1) **Completed and in-progress reports and studies (list is not all inclusive):**

- a) See North Slope Science Initiative Catalog (<https://northslopescience.org>)
- 2) **References:** References, guidelines, manuals, handbooks, examples, publication standards, printing standards, and mapping standards have already been provided by the BLM in existing primary documents, studies, and reports that are currently available. The BLM may provide additional references upon award and as they become available.
  - 3) **GIS and Remote Sensing:** The BLM will furnish all currently available GIS base data, available aerial photos and satellite imagery, and other geospatial raster and vector data sets. The BLM will provide data schemas to be used and followed for any data development work required during this effort. If any additional data collection is required, the BLM GIS Specialist will review and approve the data prior to incorporation into deliverables. See Appendix C.
  - 4) **Other Data:** The BLM will supply other existing and available BLM non-spatial graphic or BLM tabular resource data, upon request.
  - 5) **Contracting Officer's Representative:** The BLM will provide a designated COR and a designated BLM project contact (project manager). The BLM project contact may also serve as the COR or project inspector. The COR will serve as contractor-BLM liaison and the project inspector and/or COR.
  - 6) **BLM Staff:** The BLM will provide representatives and appropriate interdisciplinary staff for all document reviews, public meetings, workshops, and hearings.
  - 7) **Mailing:** The BLM has developed the mailing list for the project and will provide it along with templates for postcards, newsletters, brochures, community posters, news releases, etc. The contractor shall maintain and regularly update the mailing lists (email, snail mail) and offer suggested additions and deletions to the project mailing list. The mailing list will continually be shared with BLM when there are changes and routinely updated, at least bi-annually or prior to mailings, to capture frequent rural village changes in Tribal and/or city leadership, in addition to leadership changes of other corporations and organizations.
  - 8) **Data Collection:** The BLM will furnish to the contractor the results of data collection or digitization efforts that are conducted independent of this contract. These studies will be completed by various contractors or in-house by BLM personnel. Each study will consist of inventory data and other resource findings. Data may be in a variety of formats. Data collection and revisions by BLM for use and incorporation into this EIS may occur throughout the planning process.
  - 9) **Federal Register Notices:** Current policy requires review of agency action notices at the Departmental level prior to publication in the *Federal Register*. The BLM will prepare all *Federal Register* notices (FRN) for the EIS and acquire all necessary BLM and Departmental approvals.
  - 10) **Access to BLM servers** once contractor meets required background checks and associated trainings and security clearances
  - 11) **BLM instructions and policy** for compliance with Section 810 of the Alaska National Interest Lands Conservation Act.
  - 12) **Other Tasks Performed by BLM:**
    - a) The BLM GIS specialist will coordinate with the contractor's GIS staff, provide existing geospatial data, and review all GIS work completed by the contractor. The BLM GIS specialist will review contractor-generated map products and associated analyses and calculations to ensure proper use of BLM standards and presentation of BLM data. The BLM will provide a location on one of its

data servers for the contractor to have full access to be able to create and manage GIS data and maps.

- b) Posting of the EIS document versions on the ePlanning website. The contractor must provide a version of each document that meets the document standards for posting on this site (e.g., file size, .pdf with bookmarks, etc.).
  - c) Essential fish habitat analysis and findings
  - d) Section 106 consultation with the Alaska State Historic Preservation Office
  - e) Coordination of the Biological Assessment with FWS for consultation under Section 7 of the Endangered Species Act review
  - f) Tribal consultation as required by NEPA, the National Historic Preservation Act (NHPA), Archeological Resource Protection Act (ARPA), Native American Graves and Repatriation Act (NAGPRA), and BLM regulations. The BLM will be responsible for conducting tribal consultation for the plan per EO 13175 and policy.
  - g) The BLM will take the lead in presentations/consultations/meetings and communications with the State of Alaska, USFWS, BLM Resource Advisory Council, Alaska Native Tribes, BLM Washington Office, BLM State Office, and Cooperating Agencies.
  - h) The BLM will provide representatives at all public meetings, workshops, and hearings. The BLM will provide contact information for resource specialists.
  - i) Agency Specialists: The BLM will provide contacts to supply the contractor with input/information regarding affected programs and resources. The contractor shall provide all primary authors, as indicated on the attached spreadsheet.
- 13) If required, BLM will supply the contractors' selected staff member with facilities to complete any necessary in-house work within the BLM Alaska State Office building; however, access to BLM facilities and network drives shall be subject to successful completion of a background clearance as required by Bureau and Departmental policies. Public internet service is not available at BLM facilities. Any in-house work completed by the contractor will be directed by the contractor's project manager or assistant project manager.
- 14) **References:** Including guidelines, manuals, handbooks, example publication standards, printing standards, and mapping standards for all supporting documentation (includes copies of prior EISs, environmental assessments, biological assessments, and related BLM documents) as needed by the contractor. References may be provided in electronic formats or as internet references.
- 15) **Mailing Lists:** The BLM has developed and maintained a mailing list, changes and updates to this mailing list shall be made by the contractor and provided to BLM upon request. Both BLM and contractor must be working from the most current contact list at all times.
- 16) **Data:** The BLM will furnish GIS and related data, as available, for the contractor's use and inclusion in the documents.
- 17) The BLM will conduct any **informal or formal consultations** that may be required. The BLM will lead Tribal consultations with the assistance of the Contractor.
- 18) **Printing and Distribution:** The BLM will print and mail the required EISs and RODs if the same contractor task is not initiated due to lack of funding.
- 19) **Planning Record Schema, Format, and Filing Method:** The BLM will provide the project decision file (administrative record) index format and outline. The contractor shall use the existing index format and outline.



## 6. GENERAL SUBMISSION OF DELIVERABLES

A performance-based approach specifies a result. Appendix B presents a summary of deliverables that will constitute completion of this project. The information herein is generally limited to the end product that is needed and does not provide a detailed step-by-step process for performing the work. The selected/contracted service provider will be responsible for the submission of deliverables identified in this Performance Work Statement. The BLM and the contractor will agree to a schedule of due dates for deliverables during the development of the Project Management Plan.

If a contractor deliverable is dependent on the provision of materials, data, information, etc. by BLM, the Project Management Plan will also specify due dates for BLM provision of these materials. If BLM does not meet agreed upon due dates, contractor due dates will be adjusted accordingly. It is not acceptable if a product is turned in to meet a scheduled date but does not meet the content requirements (and needs) of the task or document.

All submitted deliverables must:

- Meet BLM requirements (quality standards), as required by laws, regulations and guidance, including compliance with Section 508 of the Rehabilitation Act of 1973 (Section 508) (see Appendix D for specific requirements regarding 508 compliance); and
  - Be approved by BLM staff and COR/PI.

### A. General submission guidelines:

- 1) **Software:** With the exception of geographic information systems (GIS) and web-based deliverables or as requested (e.g., Section 508 compliant PDFs for posting on website), the contractor will submit all written deliverables in Microsoft Office software applications.
- 2) **Drafts:** The contractor will provide the BLM with the requested number of paper copies of each submission of draft documents, e.g., the preliminary draft and preliminary final EIS, etc. The contractor will also provide electronic copies via electronic transmission or CD-ROM.
- 3) **Printing:** The BLM is responsible for printing hard copy documents through the Government Printing Office. The contractor will provide the BLM with a camera-ready, electronic copy of the document in requested software applications. The contractor will also provide a PDF copy of the document that complies with Section 508.
- 4) **Executive Summary:** All major documents associated with this plan will incorporate a concise executive summary that summarizes the purpose of the document and all major points/decisions.
- 5) **Administrative Record:** On a regular basis, or upon BLM request, contractors will provide BLM with digital copies of all records for inclusion in the administrative record supporting the project. An index of these documents should be provided as well.
- 6) **World Wide Web:** Contractors may not host any BLM materials on publicly accessible websites. Any web-based deliverables will be hosted on BLM servers. All web-based deliverables

must comply with Section 508 of the Rehabilitation Act of 1973, including BLM-specific policy guidance implementing Section 508.

7) **Data and GIS:** It is anticipated that the Coastal Plain Oil and Gas Leasing EIS will use existing social, geological, and biological data. The contractor will not be required to collect additional raw field data as part of this contract. Most raw data will need to be compiled/manipulated to provide meaningful plan information. Data management will comply with the requirements of the attached Appendix C: BLM Data and Metadata Requirements. BLM requires all underlying data and metadata be maintained in an organized fashion and submitted to the BLM upon request, or at a minimum at project completion.

## 7. TENTATIVE SCHEDULE

A tentative schedule for the EIS is provided in Appendix A of this SOW. The tentative completion date for the EIS is March 2019. Within the laws and regulations governing the NEPA process are a number of timing requirements. In addition, the EIS should be completed in accordance with Secretarial Order 3355, *Streamlining National Environmental Policy Act Reviews and Implementation of Executive Order 13807 "Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructures Projects."* Days given below are calendar days, not workdays.

The relevant requirements to the development of a schedule to meet the completion date are:

- Minimum 60-day scoping period
- 45 day comment period on the Draft EIS

Public review, comment, and protest periods begin with the Environmental Protection Agency's publication of a notice of availability in the Federal Register.

Prospective contractors should use the following review timeframes in their proposals:

- 2 week State and Field Office review of the preliminary and completed Scoping Report, Draft and Final EISs and ROD,
- 2 week Washington Office and Departmental review of Draft and Final EISs and ROD
- 4 weeks to print a document once it is sent to printer.

The contractor should also allocate time for participation and coordination with the BLM interdisciplinary team in development of the Draft EIS, including proposed action and alternatives.

## 8. TASKS

The following list provides a general outline of the tasks and responsibilities associated with completion of the Coastal Plain Oil and Gas Leasing EIS. The selected service provider must demonstrate the experience and skills necessary to prepare an environmental impact statement with full public participation.

### Task 1: Kick-Off Meetings and Project Management Plan

Initial tasks performed by the Contractor will include the development of the formal Project Management Plan, Budget, and Project Schedule for completing required tasks and deliverables. The Project Management Plan should build upon the information and expectations provided by the BLM in this Statement of Work. This plan

will identify, at a minimum, the work breakdown structure, risk management strategy, critical path schedule, staffing plan with subcontractor management, and internal communication plan for each task of the EIS process. The Project Management Plan should illustrate how the contractor will track progress of the process. The Preliminary Schedule will be developed utilizing Microsoft Project software or similar timeline planning tool.

The Contractor will facilitate a post contract award Kickoff meeting in Anchorage, Alaska. The purpose of the Kickoff meeting will be to ensure that the BLM and Contractor have a clear and mutual understanding of all project and contract requirements and inform all parties regarding the next steps of the process. The Project Management Plan, Schedule, and Communication Plan will be finalized at this meeting. Key Contractor and BLM staff shall attend. A maximum of three contractor staff shall be in attendance; others may join via teleconference.

After contract award, BLM and the contracted service provider will develop a project management plan. This Project Management Plan will identify, at a minimum, the work breakdown structure, risk management strategy, critical path schedule, staffing plan (including on-board skills/skill needs), and cost estimate breakdown. The project management plan should illustrate and track progress on completing the project.

The Project Management Plan will establish due dates for deliverables outlined in this Performance Work Statement. The Project Management Plan should include timeframes for public participation activities and administrative reviews. It will also establish due dates for BLM provision of materials, data, information, etc. necessary for contractor completion of deliverables. The definition of successful delivery of a product should be agreed to by BLM and the contractor in the Project Management Plan as well.

The contracted service provider and BLM will establish strategies for internal project communication, which will serve as the primary information exchange for the project. These strategies may include an internal conferencing web site, shared computer drives, contractor personnel co-located with BLM offices, monthly risk management strategies and briefings, and monthly earned value estimates.

Quality Standard: The meeting will follow an agenda developed by both the Contractor and the BLM. The Contractor will prepare take notes and distribute to attendees within 5 working days of the meeting. The project schedule shall utilize Microsoft Project or similar format. The project schedule will be of sufficient detail for use in day-to-day management and resource allocation purposes. At a minimum, it will clearly identify a work breakdown structure including precedents/dependencies, the project’s critical path and critical path tasks, BLM and cooperating agency review/working periods and deliverable dates, and project milestones.

Deliverables:

- Project Management Plan.....(1)
- Internal communication strategies.....(var.)

**Experience Criteria for Contractor Team Members.**

All individuals on the team should express strong technical writing skills and the ability to draft the sections of the EIS specific to their expertise.

- 1) **Project Manager and Assistant Project Manager:** These positions shall be the main points-of-contact for all information and work flow between BLM and the contractor. The project manager and assistant project manager must have prior project management experience with BLM EISs and be familiar with and apply all applicable laws, regulations and policies throughout the NEPA process. They must have the ability and demonstrated previous experience to lead, participate, facilitate, communicate, and be available for all critical stages in the collaborative and public process. The contractor’s project manager and assistant project

manager shall attend and co-lead key project milestone meetings as indicated in the contractor's Project Management Plan. The project managers shall also work directly with contract specialists to address cooperating agency, public, and internal BLM comments. The project managers shall be responsible for supervision, daily work direction, quality control, and editing of program area submissions by supplemental core team members provided by the contractor.

- 2) **Technical writer/editor:** This individual(s) should possess a strong technical writing/editing background and have the ability to ensure a multi-authored document reads consistently and in one voice.
- 3) **Natural Resources Specialists/Renewable Resources staff:** Individual(s) shall have a background in natural resources and public land management. *Where an offeror does not possess Alaska-specific experience, or may have related experience, an offeror may submit an "Alternate Alaska Experience Plan."* This plan shall identify how the offeror proposes to supplement, subcontract, or otherwise obtain the knowledge and skills required to address and analyze the following:
  - Management of wildlife, fisheries, and vegetation.
  - Experience working with tribal government.
  - Experience working in rural areas with primarily Alaska Native cultures.
  - ANILCA which provides specific guidance on access, wilderness, subsistence, and withdrawals. An understanding of the provisions and limitations and experience with the nuances of ANILCA is imperative.
  - The ANILCA Section 810, associated analysis, and public hearing requirements.
  - Analysis of effects on Essential Fish Habitat (Magnuson-Stevens Act 1996).
  - Permafrost, thermokarst, climate change impacts in the Arctic, and common Alaskan vegetation and forest types.
  - An understanding of the industry practices used in the Arctic climate to effectively mitigate impacts upon resources and withstand arctic conditions (e.g., ice roads, tundra travel).
- 4) **The contractor must have professional and technical knowledge of:**
  - a) unique Alaskan rangelands (e.g., tundra);
  - b) soils and permafrost;
  - c) arctic region climate change and effects;
  - d) landscape level assessment and planning;
  - e) application of and other natural and environmental science principles;
  - f) relevant and current research;
  - g) GIS/mapping; and
  - h) classification, interpretation, and analyzing impacts on permafrost, soil and vegetation. The BLM recognizes the contractor may require flexibility with matching personnel to the skill sets required to complete the tasks. The contractor shall provide Noise analysis and best management practices, for which there is no current BLM internal staff. Noise associated with construction or proposed developments shall have best management practice, project design feature, and/or standard operating procedure recommendations to decrease potential impacts to common wildlife species and nearby communities. The contractor's resources staff shall mirror BLM's interdisciplinary team (internal):
    - Vegetative communities (including special status plants)
    - Geology and Physiography

- Soils and permafrost (cave and karst familiarity)
- Water resources and hydrology
- Air quality and air quality related values
- Acoustical environment
- Climate and meteorology
- Fish and aquatic species (including invasive aquatic species threats and Essential Fish Habitat)
- Wildlife (including invasive terrestrial species and special status wildlife)
- Sociocultural Systems
- Environmental Justice
- Subsistence biology
- Landscape ecology
- Ecosystem-based management, assessments, and monitoring
- Wildland fire ecology and management
- Cultural and historic resources
- Paleontological resources
- Geology and minerals
- Forestry
- Outdoor recreation and travel management
- Economist
- Anthropologist

5) **Mineral Specialist/Non-renewable Resources staff:** This individual(s) shall have experience with all the necessary BLM guidance related to leasing, drilling, and production of fluid leasable minerals and related mitigation and reclamation practices. It would also be helpful if the individual(s) possessed a working knowledge of geology within the arctic. Where an offeror does not possess Alaska-specific experience, or may have related experience, an offeror may submit an “Alternate Alaska Experience Plan.” This plan shall identify how the offeror proposes to supplement, subcontract, or otherwise obtain the knowledge and skills required to address and analyze the following:

a) While the BLM recognizes that the contractor may require flexibility with matching personnel to the skill sets required to complete the tasks, the contractor’s non-renewable resources staff shall mirror BLM’s internal staff in the following key programs:

- Hazardous Materials and Hazardous Materials Management
- Petroleum Resources
- Sand and Gravel Resources

6) **Facilitator:** The facilitator is required to attend all meetings associated with alternatives development. S/he shall have demonstrated abilities to effectively lead a large group of people through a complex and often contentious process and must be skilled at negotiations and mediation. Experience with past BLM Facilitation of alternatives in order to draw upon examples for team consideration will be extremely helpful.

This individual shall work closely with the BLM project manager to design workshops, hearings, or other collaborative efforts.

- 7) **GIS Specialist Requirements:** This person shall have an extensive background in GIS used in natural resources management applications as well as sound cartographic skills to make clear and accurate map products. S/he shall be required to work very closely with the BLM GIS Specialist and respond to his/her needs. S/he would not be required to attend public meetings, all workshops, hearings, or other collaborative efforts; however, s/he may be asked to assist with presentations, remotely or in person, if an explanation of GIS information is necessary. It will be required that the GIS specialist attend some workshops in person to understand the context of some Leasing EIS team decisions.

## **Task 2: Scoping Meetings and Scoping Report**

The Contractor will assist the BLM in conducting both internal and external scoping. For internal scoping, the Contractor will be responsible for preparing an agenda and co-facilitating one ID Team and Cooperating Agency meeting in Anchorage with the BLM Project Manager, recording internal scoping comments, and including them in a Scoping Report once public scoping is complete.

For external scoping, the BLM will provide the Contractor with the current mailing list. The Contractor will then develop and maintain a mailing list for the duration of the project (names and addresses will be added throughout the project). The Contractor will keep an up-to-date electronic mailing list of all individuals and groups commenting or expressing interest in the EIS process and those signing in at public meetings.

The BLM will host public scoping meetings in the following tentative locations in Alaska. If requested by tribal governments, BLM may host additional meetings.

- Anchorage
- Arctic Village
- Fairbanks
- Kaktovik
- Utqiagvik

The BLM will provide for transportation on government charter aircraft for no more than two contract employees from Anchorage or Fairbanks to Kaktovik and Arctic Village for associated public meetings. All commercial flights will be the responsibility of the contractor.

The Contractor will be responsible for assisting the BLM with logistical management for each public meeting such as scheduling, preparing and mailing meeting notifications, preparing newspaper announcements and press releases as necessary, preparing meeting materials (e.g. sign-in sheets, handouts, posters, comment forms, etc.), attending and assisting with meeting facilitation, and comment collection and management.

The Contractor will prepare a Scoping Report incorporating both public comments and internal scoping. The Contractor will include the following items in the Scoping Report:

- 1) Summarize and categorize comments for cross reference by interest and issue to sections of the EIS (to be incorporated in Chapter 1)
- 2) Determine the number of individuals/groups/agencies raising the same or similar issue that can be addressed with the same approach or resolution
- 3) Provide adequately detailed issue statements to form the basis of recommended analysis approaches for appropriate resolution of issues (the scoping report will form the basis of the analysis plan identified for preparation prior to chapters 3 and 4)



- 4) For those issues that are not analyzed, document in the Scoping Report why analysis of the issue was not necessary to make a reasoned choice among alternatives

Quality Standard: The mailing list will remain up-to-date at all times throughout the project. Print materials associated with public meetings and notification will be of high quality and designed according to direction from the BLM. The Scoping Report will follow the standards identified in the BLM NEPA Handbook (H-1790-1). The Scoping Report shall include all written, electronic, and verbal comments obtained through scoping.

Deliverables:

- Project mailing list
- Public meeting notifications and materials
- Scoping Meetings
- Scoping Report

### **Task 3: Develop Draft EIS**

The selected service provider will conduct the necessary research and perform the required analyses to provide the BLM Alaska with a DEIS directly addressing the issues identified in the BLM prepared purpose and need, and public scoping.

The DEIS will consider and analyze the potential environmental impacts of various leasing alternatives, including the areas to offer for sale, and the terms and conditions (i.e., lease stipulations and best management practices) to be applied to leases and associated oil and gas activities to properly balance oil and gas development with existing uses and conservation of surface resources, and to limit the footprint of production and support facilities on Federal lands to no more than 2,000 surface acres. The lands comprising the Coastal Plain include approximately 1.6 million acres within the approximately 19.3 million-acre Arctic Refuge.<sup>2</sup>

The DEIS will be in accordance with Title II, Section 20001 of the Tax Act and the NEPA of 1969, as amended, and analyze a leasing program in a manner similar to the administration of lease sales under the Naval Petroleum Reserves Production Act of 1976, as amended.

The contractor will conducting an alternatives workshop with the BLM and Cooperating Agencies to develop the range of alternatives to be considered in the EIS, that will help BLM and its partners understand the various ways of addressing the issues in the EIS. BLM will consider all reasonable resource management alternatives that address the issues and meet the requirements of the Tax Act and more than one complete alternative will be developed for detailed study. BLM will choose a preferred alternative from the alternatives or a preferred alternative will be developed. The contractor will analyze the impacts of the alternatives considered in detail, guided by procedures outlined in the planning regulations, handbooks, and NEPA. The methodology for the impacts analysis must be agreed to by the BLM staff and the final analysis will be made in consultation with BLM staff.

The contractor will prepare an administrative draft of the Draft EIS for agency review. Contractor must be prepared to accept agency comments and re-draft documents as necessary. Contractor should anticipate a minimum of two administrative reviews to incorporate agency and stakeholders input. The Draft document will be provided to BLM in appropriate electronic formats as required by the agency/printer, including a PDF copy

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<sup>2</sup> The Coastal Plain area has also been commonly called the 1002 area.

that complies with Section 508 of the Rehabilitation Act of 1973. BLM will manage printing and distribution through existing agency mechanisms. All documents will be professional in appearance; edited for correct grammar and readability by the general public; be free from agency jargon, while maintaining a scientific base; minimize acronyms; include appropriate maps and other graphics; and clearly depict management proposals.

Deliverables:

- Reasonable Foreseeable Development Scenario .....(1)
- Administrative (review) drafts of Draft EIS.....(2)
- Draft EIS.....(1)

**Task 4: Public Comment Meeting(s)**

Contractor/selected service provider will be responsible for managing the (minimum) 45-day Public Comment Period on the Draft EIS. During this period, Contractor will assist the BLM in conducting a minimum of five (5) public comment meetings. The location of the public meetings will be determined by BLM in coordination with the contractor. Contractor will manage all logistics for conducting the meetings and preparation of meeting materials.

BLM anticipates the following locations at minimum: Anchorage, Arctic Village, Fairbanks, Kaktovik and Utqiagvik, Public meetings on the DEIS may be highly contentious and well attended in the larger communities. During these public comment meetings, the contractor will act as facilitator/mediator/support staff and will be responsible for gathering written public comments on the DEIS. The BLM Project Lead will be responsible for conducting the meeting. The contractor will be required to organize a record of public comments received during the public meetings and a sign-in sheet for each meeting to document public involvement.

Contractor will also be responsible for public outreach in advance of public meetings, including drafting press releases, public outreach materials (posters, maps, brochures, planning update document, PowerPoint, etc.). BLM will review and approve outreach materials. BLM will issue press releases.

Upon completion of the public comment period, contractor will provide to the BLM a public comment meeting summary report and written responses to comments. It is anticipated that the BLM will receive a substantial amount of comments so the contractor proposal should include a description on how comments will be managed and analyzed.

Deliverables:

- Public Meetings & Sign-in Sheets.....(5)
- Public Comment Record.....(1)
- Public Comment Meeting Summary Report.....(1)

**Task 5: Final EIS Development**

BLM will issue a Final EIS that improves upon the work completed in the Draft EIS and responds appropriately to comments received on the Draft EIS. The Final EIS may also present additional analysis required due to comments received on the Draft EIS.

Contractor will develop the Final EIS in response to public comments on the EIS and document changes to the BLM's preferred alternative. Contractor must be prepared to accept agency comments and re-draft document as necessary. Contractor should anticipate a minimum of two administrative reviews to incorporate agency and stakeholder comments. Changes will be incorporated into the Final EIS ready for submission to printers as with the Draft.

Deliverables:

- Administrative drafts of Final EIS.....(2)
- Final EIS.....(1)

**Task 6: Record of Decision**

The ROD must be published in the same document with and reference the FEIS.

The contracted service provider will develop the ROD. The contracted service provider must be prepared to accept agency comments and re-draft document as necessary. The contracted service provider should anticipate a minimum of two administrative reviews to incorporate agency and stakeholder comments. Changes will be incorporated into the ROD ready for submission to printers as with the Draft EIS.

Deliverables:

- Administrative drafts of Record of Decision .....(2)
- Printer ready Record of Decision.....(1)

**Task 7: Administrative Record**

The contracted service provider will organize, develop, and maintain the administrative record for the EIS to document the BLM's planning process. The Contractor will define administrative record protocols, meet with the ID Team about the administrative record, and ensure on-going maintenance. The contractor will house the administrative record on a secure site. At a minimum, Contractor should provide BLM with an updated index for the administrative record on a quarterly basis. At the end of the project, the contractor will transfer the complete administrative record to the BLM. The contracted service provider will deliver the final administrative record to the BLM within four weeks (20 business days) of the issuance of the Record of Decision.

Documents for the administrative record include, but are not limited to:

- Final versions of all NEPA documents and supporting reports and/or studies
- Draft versions of all documents showing substantive changes or comments leading to substantive changes
- All forms of internal substantive comment (email, comment forms etc.)
- Supporting materials and references (professional papers, website information etc.)
- Maps and GIS data
- Emails – both internal and external – that supported the decision-making process
- Meeting notes
- External communications (notices, letters to the public)
- Communications from cooperating agencies, stakeholders, and the public (comments, letters, meeting notes)
- Potentially privileged documents (attorney-client communications, cultural reports, etc.)

Information regarding the content and the format for the administrative record can be found in.

**Quality Standard:** The administrative record will conform to Washington Office (WO) Instruction Memorandum No. 2006-225, “Standardized Guidance on Compiling a Decision File and Administrative Record,” the BLM’s Land Use Planning Handbook (Appendix F, pp. 24-25), NEPA Handbook (H-1790-1), or other current guidance. The Contractor will accurately identify and separately categorize any Potentially Privileged or Potentially FOIA Exempt documents.

Deliverables:

- Administrative Record in digital format with searchable index.

## **APPENDIX A: Coastal Plain Oil and Gas Leasing EIS Preliminary Schedule**

Timeline	Task
On-going	Draft Project Management Plan and Memorandums of Understanding with Cooperating Agencies
Month 1-3	Publish Notice of Intent (March 15th) in Federal Register (to include lease sale notice upon completion of the ROD). Conduct public scoping and tribal consultations. 60 days
Month 4	Scoping Report Issued
Month 4-6	Prepare the Draft EIS: <b><i>Dedicated</i></b> Interdisciplinary BLM/USFWS team prepare draft alternatives and preliminary analysis of the impacts from alternatives, and the stipulations and Best Management Practices to mitigate impacts; All alternatives include different possible surface facility scenarios within the 2,000-acre surface disturbance limitation.
Month 6-7	Brief, Prepare, and Publish Notice of Availability (NOA) of Draft EIS. Concurrent with NOA, publish solicitation for interest in lease sale areas.
Month 8-9	Comment period for the Draft EIS. Hold subsistence hearings. (min 45d)
Month 10-13	Analysis of comments. Develop the Final EIS. Develop final alternatives after analysis of comments (to include areas available for leasing), and consultation with cooperating agencies. Develop specific terms, conditions, stipulations and mitigation measures to put in leases (using terms, conditions, stipulations and mitigation measures outlined in the Final EIS).
Month 14	Prepare and Publish Notice of Availability of Final EIS. (minimum 30 days before issuance of ROD)
Month 15-16	Brief, Prepare, and Issue ROD <sup>3</sup> to include Lease Sale Notice.

## **APPENDIX B: Summary of Deliverables**

### **Task 1: Develop Project Management Plan**

#### **Deliverables:**

- Project Management Plan..... (1)
- Internal communication strategies..... (1)

### **Task 2: Scoping Meetings and Scoping Report**

#### **Deliverables:**

- Project mailing list.....(1)
- Public meeting notifications and materials.....(varies)
- Public meeting & Sign-in sheets .....(5)
- Scoping Report.....(1)

### **Task 3: Develop Draft EIS**

#### **Deliverables:**

- Reasonable Foreseeable Development Scenarios w/updated oil potential maps.....(1)
- Administrative (review) drafts of Draft EIS.....(2)
- Draft EIS.....(1)

### **Task 4: Public Comment Meeting(s)**

#### **Deliverables:**

- Public Meetings & Sign-in Sheets.....(4)
- Public Comment Record.....(1)
- Public Comment Meeting Summary Report.....(1)

### **Task 5: FEIS Development**

#### **Deliverables:**

- Administrative drafts of Final EIS.....(2)
- Final EIS.....(1)

### **Task 6: Record of Decision**

#### **Deliverables:**

- Administrative drafts of Record of Decision .....(2)
- Record of Decision.....(1)

### **Task 7: Administrative Record**

#### **Deliverables:**

- Administrative Record (digital file).....(1)

## **Appendix C: BLM Data and Metadata requirements**



All deliverables shall comply with applicable international, national and Federal information technology and geographic information standards, particularly those determined by the Federal Geographic Data Committee (FGDC) as supporting the National Spatial Data Infrastructure.

Failure to comply with the official policy on spatial data as set forth in three Office of Management and Budget Circulars (OMGB A-16, OMB A-119, and OMB A-130) and by presidential Executive Order 12906 will not be acceptable and payment for work incurred will not be forth coming until these requirements are met.

#### **Data Requirements:**

- All GIS data developed by the contractor shall meet BLM accuracy standards for each data set
- All GIS data developed by the contractor shall be provided in ESRI file geodatabases (v10.2)
- All GIS data developed by the contractor for which the BLM has established standards must follow those standards
- All GIS data developed by the contractor shall use the NAD\_1983\_California\_Teal\_albers coordinate system:
  - WKID: 3310 Authority: EPSG
  - Projection: Albers
  - Datum: North American 1983

#### **Feature Level Metadata Requirements:**

- All final delivery point and line feature classes will at a minimum have the following populated columns:
  - Create\_Date: Date the feature was created
  - Create\_By: Who created the feature
  - Modify\_Date: Date the feature was modified
  - Modify\_By: Who modified the feature
  - Coord\_Src\_type: The name that identifies the general category for the origin of the location coordinate, representing a compilation of the state-adopted source codes. The domain contains those code values that would most likely be used in the determination of source codes for the data set. Attribute Domain Assignment: DOM\_COORD\_SOURCE\_TYPE. Attribute Domains will be provided by the BLM; Default: UNK
  - Accuracy\_Ft: The Accuracy Measurement defines how close, in feet, the actual ground location is to the spatial depiction in GIS. This value would typically be determined by one of three methods:
    1. The map accuracy value, if a USGS map was used to define the boundary
    2. The expected spatial accuracy achieved with GPS, or
    3. The measurement of that accuracy as is noted in the National Standard for Spatial Data Accuracy (NSSDA) 1, which is a data usability standard issued by the FGDC. A value of -1 indicates that the accuracy is unknown or that no reliable estimate can be made (1 FGDC. 1998. Geospatial Positioning Accuracy Standards, Part 3; National Standard for Spatial Data Accuracy, FGDC-STD-007.3--1998. Attribute Domain Assignment: none; Default Value: '-1'.
- In addition to the fields listed above, all polygon feature classes will have an accompanying line feature classes that also includes:

- Def\_Fet\_Type: The code that identifies the high-level category for the actual physical or mapping characteristics (features) from which the arcs are derived to create polygon boundaries. Attribute Domains will be provided by the BLM

### **Other Metadata Requirements**

- All Geospatial objects in the final deliverable file geodatabases shall include fully populated North American Profile of ISO 19115 2003 metadata, including complete Field Entity and Attribute Information
- All other content types must include the ESRT Item Description Metadata Style (6 fields)

### **Data Access and Transfer Protocol Requirements**

- Secure methods of data transfer must be used for all data transferred to and from the BLM
- To the extent possible privacy data shall be redacted from all data transferred to and from the BLM: If work requires use of privacy data, the privacy data must be noted, segregated, encrypted, and access to the data limited
- Contractors may not host any BLM materials on publicly accessible websites
- Any web-based deliverables will be hosted on BLM servers
- All web-based deliverables must comply with Section 508 of the Rehabilitation Act of 1973

### **Geospatial Analysis Requirements**

- Geospatial analysis, reports and cartographic products must be independently reproducible
- All data, interim data, Tools, models, and scripts used in the analysis must be included in the deliverables

## **Appendix D: Section 508 Compliance Requirements**

### **Section 508 Service Requirements**

Section 508 must be considered as a requirement on the delivered Electronic Documents. The [Section 508 Accessibility Standards](#) apply to these deliverables, specifically the following Functional Performance Criteria:

- [301.1 Scope](#) - The requirements of Chapter 3 shall apply to ICT (Information Communication Technology) where required by 508 Chapter 2 (Scoping Requirements), 255 Chapter 2 (Scoping Requirements), and where otherwise referenced in any other chapter of the Revised 508 Standards or Revised 255 Guidelines.
- [302.1 Without Vision](#) - Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user vision.
- [302.2 With Limited Vision](#) - Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.
- [302.3 Without Perception of Color](#) - Where a visual mode of operation is provided, ICT shall provide at least one visual mode of operation that does not require user perception of color.
- [302.4 Without Hearing](#) - Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.
- [302.5 With Limited Hearing](#) - Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.
- [302.6 Without Speech](#) - Where speech is used for input, control, or operation, ICT shall provide at least one mode of operation that does not require user speech.
- [302.7 With Limited Manipulation](#) - Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or simultaneous manual operations.
- [302.8 With Limited Reach and Strength](#) - Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable with limited reach and limited strength.
- [302.9 With Limited Language, Cognitive, and Learning Abilities](#) - ICT shall provide features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier.

Solicitation respondents must describe how their proposed delivered Electronic Documents will meet these requirements.

Electronic documents delivered must also be made available in alternate formats upon request, including formats compatible with assistive technology at no additional charge. Solicitation respondents must describe how their Electronic Document deliverables meet this requirement.

### **Section 508 Evaluation Factors**

Responses to this solicitation will only be considered for award after it has been determined that the proposal adequately addresses the requirements for Section 508. Only proposals which contain adequate information to document their responsiveness to the Section 508 requirements will be eligible for any additional merit consideration.

### **Section 508 Acceptance Criteria**

Electronic Documents delivered as a result of this solicitation will be accepted based in part on satisfaction of identified Section 508 requirements for accessibility.