

Nomination Received by Council on Environmental Quality, Executive Office of the President
For the CEQ NEPA Pilot Project Program
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/nepa-pilot-project-nominations>

PART I. NOMINATOR

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Organization:	USDA Forest Service
Project Title:	Electronic Modernization of NEPA (eMNEPA)
Submitted by:	Member of the Public
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PART II. SHORT ANSWERS

I. What Federal agency or agencies will be involved in this pilot project?

USDA Forest Service

II. What is the Federal action to which this NEPA pilot project applies?

This project, the electronic Modernization of NEPA (eMNEPA) system, is applicable to any Forest Service NEPA Project. eMNEPA is a web-based set of tools used for NEPA project, appeals and litigation tracking and reporting (through the public web and internally); NEPA document storage, tracking and distribution on the public web; and public comment ingress, analysis and response. eMNEPA is used to track and assist with all NEPA projects at the Forest Service.

III. How will this pilot project reduce the costs and time needed to complete the NEPA process?

By reducing the amount of paperwork USFS creates as part of the NEPA Process, the electronic modernization of NEPA (eMNEPA) project reduces both the time required to complete the NEPA process and the associated costs. The eMNEPA project uses integrated, IT applications to automate some burdensome and historically paper-intensive processes. This is done through a system that has been simple and straightforward to build, is easy to use, has extremely high adoption by the field, improves the every-day work of field personnel and has saved millions of dollars and countless man-hours since its inception.

For example, one of the most resource-intensive processes has, historically, been collecting and responding to public comments. This pen-and-paper process is a drain on agency personnel that requires them to collect, read, and respond to hundreds, and, often, thousands of comments. The eMNEPA suite of tools includes a tool to manage and help automate the analysis of these comments.

This tool provides the general public with an online comment collection document (web form) that can be completed and submitted online. Comments submitted via traditional means (e.g. e-mail or hard copy) can be entered into the tool by the end user. The comment management tool aggregates the comments and provides the field with tools to help them quickly identify, classify and respond to comments in a way that can be used in final documents. Time is saved because the tool identifies and

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sorts form letters and flags terms that may require early attention (e.g. “comment period extension” or “sue”). Furthermore, the centralized nature of the tool allows a specialist to easily respond to public comments in one location rather than passing computer files or hard copies around the office; reducing printing, data entry and duplication of effort.

eMNEPA’s comment management tool is just the most recent in the suite of tools that has reduced printing and mailing, streamlined data entry, broke up the silos containing NEPA data into a corporate data set, standardized presentation of data on the public web, and enabled the agency to learn lessons from their years of NEPA analysis. The eMNEPA program has given a high return on investment, reducing the time and cost of the administrative tasks in the NEPA process and freeing employees to focus on environmental analysis and other duties.

IV. How will this pilot project ensure rigorous environmental protection?

- (1) Allowing USFS personnel to focus more of their time and energy on rigorous environmental studies/analyses by reducing redundant paperwork, reporting, and response to data calls.
- (2) Enabling USFS to perform a more comprehensive analysis of project impacts.

As detailed in the previous question regarding cost and time reduction, the eMNEPA initiative enables USFS personnel to spend more time in the field, as USFS employees include thousands of highly educated subject matter experts. eMNEPA frees up these scientists and researchers to perform more in-depth, comprehensive environmental analyses of proposed projects by automating and streamlining data flows within the agency and to and from the public. The more time these experts spend performing in-depth environment analyses, and the less time they spend responding to duplicative data calls, the better the outcomes for the environment.

In addition to analyzing the impacts of a proposed project on the physical environment, USFS must also analyze the potential socio-economic impacts, which are often overlooked. To truly grasp the full socio-economic effects of a proposed project, the agency should collect feedback from as many citizens as possible. The eMNEPA initiative allows the USFS to do just that by:

- o Publishing proposed project information to a small collection of easily-accessible websites.
- o Making documents available on the web in a timely manner and where people are already going for information.
- o Creating an intuitive, user-friendly means for the general public to submit its thoughts & concerns via the internet.

Historically, notices about proposed projects were issued to the local community expected to be affected by a project. Oftentimes the only people who learned about a proposed project were locals and well established special interests groups familiar with the NEPA process. However, it could be that a proposed project has the

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greatest socio-economic impact on a community that is geographically distant from the area where the project is to take place.

By leveraging the internet and making it easy for citizens across the US to both learn about a proposed project and voice their concerns, the USFS is able to develop a more comprehensive understanding of how a proposed project affects the human environment.

V. How will this pilot project improve the quality and transparency of agency decisionmaking?

The eMNEPA effort has changed the way the US Forest Service engages citizens and directly increases agency transparency and improves its decision making.

Transparency:

The eMNEPA toolset's functionalities all help to increase transparency in different ways. The electronic SOPA and automated tools to send documents and information to the public web enables USFS personnel to publish and continuously update project specific information to the web. The use of this tool provides transparency throughout the project lifecycle and enables citizens to track project developments and subscribe to automated updates.

The comment management tool increases transparency by allowing the agency to aggregate public comments and respond via the web. This functionality allows citizens to give input on projects at the web location where they are viewing the project information. Later this year, eMNEPA will also provide a public reading room for comments that will allow the public to read other comments submitted on a project. This function will not only inform the public who is commenting on a project, but it will also help improve the quality of comments by enabling the public to build upon others' ideas.

Quality:

Increased efficiency and transparency in the NEPA process leads to better informed decision making. As detailed in the previous question about ensuring environmental protection, eMNEPA allows USFS experts to spend more time in the field which consequently assures that project decisions are rooted in increasingly comprehensive analyses. More transparent analysis can improve the quality of the input that the public may give, leading to more substantive issues being raised and improving the overall quality of a decision.

Decision quality is also reinforced by the eMNEPA process. The tools put into place by eMNEPA help standardize the workflow for a NEPA project from the initial scoping all the way through potential litigation. This standard workflow ensures that steps in the process are not overlooked; improving the overall quality of agency decision making from project to project.

VI. Will this pilot project develop best practices that can be replicated by other agencies or

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applied to other Federal actions or programs? Please describe?

eMNEPA has the following best practices and lessons learned that could be replicated by other agencies:

(1) Process improvement must be done from the ground up

There is no one-size-fits-all solution to improve the NEPA process because each agency takes a slightly different approach. eMNEPA has succeeded in improving NEPA because it meets the needs of the field and the agency. To do this, an iterative process was implemented to assess and refine requirements for these tools to ensure that they were a good investment for the agency and did what was necessary to improve the process without waste. Whatever tools are implemented by the agencies must fit their own needs and the nuance of their process.

(2) The benefits of improved information management

The eMNEPA initiative illustrates how standardized information management can reduce the compliance burden associated with NEPA, saving time and money. The program's information management tools are built on simple platforms and infrastructure that are scalable to any size agency and easily implemented and used by NEPA practitioners.

(3) A process for a more transparent and publicly-engaged decision-making

eMNEPA streamlines the process for having transparent NEPA processes and facilitates citizen engagement. eMNEPA enables web content and documents to be uploaded to a place familiar to the agency and the public – at the push of a button. These updates can be sent out to mailing lists that citizens subscribe to and manage themselves. Early and frequent citizen engagement can address problems early, iteratively improve NEPA analyses, and potentially reduce appeals and litigation.

(4) The necessity of harmonizing policy with technology infrastructure

The eMNEPA project, and the USFS in general, serves as a case study in how critical it is that agency policy be in line with its technological capabilities and infrastructure. It is Forest Service policy to produce a schedule of proposed actions every quarter, to make available important project and NEPA information in a timely manner, and to respond to all comments received by the public; all of which were previously manual, time-intensive processes. With the technology available to them, the Forest Service has modernized and made more efficient the entire NEPA process by leveraging technology and implementing the tools needed to standardize and automate what were previously manual tasks, increasing timeliness and efficiency.

PART III. PROJECT DESCRIPTION

(See attachment on following page.)

Part III: Forest Service eMNEPA Project Description

The eMNEPA toolset has been simple to build, the tools are simple to use, and the program has saved the agency millions of dollars a year in NEPA implementation since its inception. Implementation and rollout of the eMNEPA program began in 2004 and continues through present day. Using an iterative and field-driven approach to determine exactly what was needed to improve the NEPA process, the program has been able to achieve key milestones and objectives throughout the implementation lifecycle. Working directly with the NEPA practitioners has increased the level of adoption for each phase of the implementation process. Additionally, Forest Service employees have provided valuable feedback and ideas to continuously improve the tools and process. The eMNEPA program is focused within the Forest Service agency across all fifty states, but is easily scalable to any agency or organization that is involved with the NEPA process.

In 2003, the eMNEPA team conducted a line of business study that outlined potential areas of improvement across the Forest Service agency. The subsequent five years of the project resulted in successes that included automating the NEPA Schedule of Proposed Actions and tracking of NEPA project planning, appeals, and litigation information for simplified reporting, to respond to data calls, and to help learn lessons about the NEPA process. These areas have provided cost and time savings to the agency in the millions of dollars per year (compared to 2003 cost estimates), generating efficiencies while also increasing engagement both internally and with the public at large.

The resources needed for implementation have been minimal. Interviewing and engaging NEPA practitioners is essential to success, so time and effort has been expended to ensure that the tools meet their needs, are easy to use, and function as expected. The eMNEPA program as a whole is “tool agnostic” meaning that its design is not dependent on any one technology platform. The program has been developed using existing agency IT infrastructure and leveraging existing IT licenses. Development of the toolset has been done with the use of preexisting development teams when possible and using agency-selected developers when not.

Moving forward, the eMNEPA program is undertaking new initiatives that will save the Forest Service time and money and could be easily reproduced at other agencies. The Comment Analysis and Response Application (CARA) helps the agency better “meet the needs of present and future generations,” as stated in the Forest Service mission, by providing a convenient and organized way to determine what those needs are through public comment. The public can easily and efficiently comment on NEPA projects and documents by providing an electronic means to do so. For the agency, CARA streamlines and automates many of the time-consuming, manual comment analysis processes (such as sorting duplicate letters) that burden resource professionals.

Also, the Mailing List Management (MLM) application is taking aim at the manually-intensive process of maintaining public mailing lists. Without a standardized system and process for managing NEPA mailing lists, they are manually handled in non-standard ways. When fully functional, MLM will take many processes, including list subscription and management services, and allow the public to manage their

own preferences, letting the agency focus on the content that the public receives and less on maintaining project mailing lists.

The eMNEPA initiatives –past, present, and future – serve as agents driving transparency and collaboration within the agency and amongst the public. President Obama’s Executive Orders of Streamlining Service Delivery and Improving Customer Service and Transparency connects with the mission and scope of the eMNEPA program: identifying innovative ways to improve customer service and streamline service delivery, to better interact and engage with citizens interested in FS NEPA projects. The American Public expects an immediate and real-time way to engage with the government, and the eMNEPA program brings the federal government closer to that reality.

I have worked with the Forest Service toward implementing these tools for over a year but believe that this approach to presenting and receiving NEPA information could be applied across the Federal Government and would improve the consistency, transparency, efficiency, and effectiveness of the NEPA process.