

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

First Name:	Jim
Last Name:	Smalls
Organization:	USDA Forest Service
Project Title:	Comment Analysis and Response Application (CARA)
Submitted by:	Federal Agency
Date Received:	June 13, 2011

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?

Our Agency’s comment analysis response application provides an efficient process for evaluating and responding to public comments received during NEPA analyses. The application is available for all Forest Service NEPA processes that require comment analysis.

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

In 2007 a content analysis business study was performed to explore opportunities for improving Forest Service public comment analysis, comment tracking and management practices. A follow-on study to define solution requirements was done in 2008. During these two studies, over 100 field staff were interviewed to gain insight, experience and feedback about performing comment analysis and response. Findings showed that any given agency project may receive from ten to 1 million comments through email, fax and hard copy. Annually approximately 1.5 million public comments are read and analyzed using various content analysis techniques involving manual processes and data entry by agency field staff resources. As a result of these studies a web-based public Comment Analysis and Response Application (CARA) became an agency priority in order to reduce administrative workload, modernize the comment analysis and response process, promote public involvement, and save costs.

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

The benefits of CARA are to reduce the overall amount of time spent by agency employees on the administrative tasks associated with public comment analysis by:

- Decreasing manual processing and the time associated with the current paper-based procedures including the automating comment processing such as sorting form letters and eliminating duplicates

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- Increasing the efficiency of project set-up, letter review, response and storage, analyzing letters, and running standard and custom reports
- Increasing consistency in the comment analysis and response process
- Increasing visibility into and sharing of comment and response information with the agency, through a web based tool
- Reducing the recurring costs of ownership (i.e. training, operations and maintenance)

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

Being web-based it allows the public easy access to learn about and comment on agency actions, 24 hours/day. See the attachment for screen shots and further information.

Cost savings associated with CARA, both internal Full Time Equivalent (FTE) time and external contractors, are significant:

- Mail processing costs the agency over \$4 million annually (~\$470,000 to external contractors and ~\$4 million in agency FTE costs)
- The combined internal and external savings would more than cover

VI. Will this pilot project develop best practices that can be replicated by other agencies or applied to other Federal actions or programs? Please describe?

Yes. This program can be alter to fit any agency's public comment and analysis needs. Through a standardize, web-based public system the agency is able to process large volumes of public comment consistently and with a high level of accuracy leading to more thoughtful and thorough environmental analyses. This system not only allows efficiencies in administrative processes it also allows us to better define key issues so field personnel can focus on analysis of and addressing these issues.

PART III. PROJECT DESCRIPTION

(See attachment on following page.)

**CEQ Pilot Program
USDA Forest Service Submission
Comment and Response
Application (CARA)
June 15, 2011**

Describe the pilot project. What agency or agencies, geographic area, and natural resource management issues will be involved?

- CARA is a web-based, database-driven system that enables the electronic submission of public comments and could be used to electronically perform comment analysis activities, greatly reducing the impact of manually processing letters and mailings. CARA is just one part of the Agency's integrated Electronic Management NEPA (eMNEPA) solution to streamline and modernize the tools and processes required for complying with NEPA.
- CARA's design, development, and pilot have been designed with a "cradle-to-grave" view of the agency NEPA and planning processes in mind. CARA provides FS interdisciplinary teams in the field with a self-service tool that exemplifies transparency and open government as described in the President's Open Government Directive, and also matches many of the vision statements laid out in the Forest Service's own Information Resource Strategic Framework Document:
 - Streamlines the public comment collection process through more centralized ingress;
 - Provides additional means for public participation and collaboration;
 - Allows the public to more specifically target their comments and concerns to proposed actions;
 - Streamlines what is now a paper-heavy and manual data entry, letter sorting, and coding process;
 - Improves field interdisciplinary (ID) teams' ability to recognize, consider, and respond to substantive issues identified by the public; and
 - Collects identified issues and public concerns centrally for local and nationwide analysis and comparison.

How will the pilot project be implemented?

CARA is currently hosted in the Forest Service's Enterprise Data Center (EDC) in the USDA's National Information Technology Center (NITC), and relies on the Forest Service's World Wide Web (WWW) publishing capabilities to provide information to the public.

Are you nominating a pilot project that has already been implemented, is currently being implemented, or is proposed for implementation?

The testing phase for CARA began in May 2011 with one project and has recently been expanded to include a second project.

•If your pilot project is underway or is proposed for implementation, describe the timeline for implementation: When would the project start? When would it be completed?

The project is in a testing phase that will be expanded this fall and we plan to have it fully operational by winter 2012.

•Describe any major intermediate milestones for implementation.

Was field testing is completed the program will be refined and available for use by all agency personnel.

- **Describe the resources that will be needed to implement the pilot project.**

We utilized contractors to develop work flow solutions and to write the program. Administratively we utilize contract administrators to oversee the contracts and individuals to provide agency support.

- **Will the pilot project further an Administration priority?**

Yes, this program uses technology in an innovative way and creates transparency into government decision making and programs. This program also significantly reduces costs and creates jobs through contracting.

When the public logs in to CARA and finds the project this is a typical screen they see:

The screenshot shows the CARA (Comment Analysis and Response Application) interface. At the top, there is a navigation bar with 'Home', 'Projects', 'Reports', 'My Profile', and 'Support'. The 'Projects' section is active. Below the navigation bar, there is a search and filter section with fields for 'Keyword', 'Activity', 'Lead Mgmt. Unit', 'Analysis Type', 'Status', and 'State'. There are also checkboxes for 'Only Show My Projects' and 'Include Archived Projects', and a 'Filter' button.

The main content area displays a table of project information. The table has columns for 'PALS Project Info', 'CARA', 'Letter Status', and 'Letter Type'. The data row shows the following information:

PALS Project Info				CARA	Letter Status				Letter Type	
Project Name (ID)	Lead Mgmt. Unit	Analysis Type	PALS Project Status	Start Date/ Comment Period	New Letters	Early Attention	Coding In Progress	Coding Complete	Unique	All Forms
RANCHERIA FOREST RESTORATION PROJECT (33846)	Kern River Ranger District	EA	Developing Proposal	5/16/2011 Formal Scoping Comment	2	0	0	0	2	0

At the bottom of the table, there is a pagination control showing '1' and a status message 'Displaying items 1 - 1 of 1'.

Here the public can gather all of the information they need to comment on the proposal. Included in the system is contact information if a member of the public has questions or needs additional information.