

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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<b>Organization:</b>	DHS, Office of Safety and Environmental Programs
<b>Project Title:</b>	Environmental Planning and Historic Preservation Decision Support System
<b>Submitted by:</b>	Federal Agency
<b>Date Received:</b>	06/15/2011

**PART II. SHORT ANSWERS**

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

The entire Department of Homeland Security, including all of its 27 Components.

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

This NEPA pilot project is the Environmental Planning and Historic Preservation (EP&HP) Decision Support System (DSS), which is an intranet-based information management application used to facilitate NEPA compliance within DHS.

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

The DSS is an intranet-based information management application that is accessible to all potential project proponents and environmental professionals within DHS to facilitate a comprehensive NEPA and environmental planning review. The application will automate work flow; electronically store DHS environmental planning documents and correspondence; provide project review tracking and project management capabilities; and include data gathering and reporting capabilities to enable DHS to generate reports for both internal and external use (e.g., performance metrics reports, annual reports to resource agencies). The DSS also contains links to existing environmental planning and historic preservation-related (EP&HP) regulations, guidance, and resource information to help reduce time spent performing background research. A business case analysis for the DSS indicated a potential avoidance of administrative time and cost of more than \$3 million for the approximately 30,000 CATEX-level project reviews completed within DHS each year.

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

The DSS is an electronic environmental planning tool designed to assist a project proponent and an environmental reviewer (two types of users) in making a determination as to whether or not a proposed action qualifies for a CATEX. Any DHS project proponent can enter a project into the DSS and initiate the review process. This will allow the NEPA review process to begin earlier in the project planning process. Once fully deployed, the DSS will be mandatory for use by all 27

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DHS Components, including field organizations, to conduct environmental planning reviews and document CATEX determinations. The DSS was developed because DHS recognizes that staff with a wide range of relevant experience (from staff with no familiarity or experience with environmental planning requirements to experienced NEPA practitioners) may be tasked with environmental impact review responsibilities in carrying out the DHS mission. For a given project, the DSS guides inexperienced users through a very detailed and rigorous set of questions to determine the applicability of a CATEX and to identify the potential for extraordinary circumstances. The DSS workflow requires that all analyses undergo a thorough review by an experienced NEPA practitioner prior to forwarding the recommendation to apply a CATEX to the project decision-maker for approval. Ultimately, the approval by the project decision-maker will confirm that the appropriate consideration of potential impacts to the human environment has occurred prior to project implementation, as required by NEPA. When the results from the conclusion of the DSS review indicate that a project does not qualify for a CATEX, the application provides an initial set of potential issues that can be used as the basis for moving forward to the scoping process for preparation of an EA or EIS.

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

DHS is made up of 27 Components with environmental compliance support staff that vary widely in number, funding, knowledge, and experience. Through the use of the automated and standardized DSS, a high degree of quality and consistency in environmental planning reviews and documentation will be achieved across the Department. In addition, the application can be used as a training tool for less experienced staff. Standardization of the environmental impact review process by using the DSS will provide quality control of the process and resulting documentation. Using the DSS will help ensure that the CATEXs are applied appropriately across the Department and any potential extraordinary circumstances are fully evaluated. Use of the DSS will bring visibility of environmental compliance review requirements to program staff who are the project proponents and decision-makers. The DSS provides documentation of a proposed project's potential for environmental impact. In addition, the application can be used as an educational tool for project proponents who are typically not EP&HP subject matter experts but are ultimately responsible for ensuring compliance of their projects. Having all CATEXs and RECs available in a central repository will facilitate easy retrieval. Furthermore, project reviews will be visible to other components within DHS. This information sharing can improve consistency in the application of CATEXs for similar actions across the Department.

**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?**

The DSS is a DHS-owned application that could be replicated by other agencies. The programming could be made available to other agencies that may wish to modify it for their use. Currently, the application is only accessible to users on the DHS network, but DHS could provide demonstrations to interested agencies.

The automated application used to collect information for determining the use of a CATEX, its

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workflow protocols, and document storage capabilities could be adopted by other agencies. The review process would enable environmental reviewers to follow a common process for evaluating the potential use of a CATEX, resulting in a reduction in review time and an increase in accuracy.

**PART III. PROJECT DESCRIPTION**

*(See attachment on following page.)*

**Project Title: Environmental Planning and Historic Preservation Decision Support System**

The Environmental Planning and Historic Preservation (EP&HP) Decision Support System (DSS) will be used by the entire Department of Homeland Security (DHS), including all 27 Components. The DSS will be used to conduct an environmental impact review of all DHS proposed actions for which a categorical exclusion (CATEX) may be the appropriate NEPA compliance determination.

The DSS is projected to provide a favorable return on the investment. With a total investment to date of approximately \$1 million, the DSS is projected to generate an annual savings of over \$3 million through process standardization and automation.

The DSS is an intranet-based information management application that will standardize and improve the efficiency and accuracy of environmental planning reviews of proposed DHS actions, will be a central repository of DHS environmental planning documents such as CATEXs and RECs and supporting materials, and will reduce processing time and costs. The DSS will be used by all DHS Components nationwide to document the review of a variety of proposed projects and evaluate potential impacts to the human environment, including natural and cultural resources.

The DSS guides a user through a detailed series of questions designed to identify the presence or absence of extraordinary circumstances across all resource areas, and to ultimately determine if a CATEX is the appropriate level of NEPA compliance or if another level of NEPA compliance is necessary. The information entered into DSS by a project proponent is reviewed by a qualified environmental reviewer and, if found complete and accurate, the project is recommended for approval. For projects that qualify for a CATEX, the system automatically generates a supporting REC for signature. When a project does not qualify for a CATEX, the results obtained from the DSS review process can be used as the initial step in issue identification moving forward to the scoping process for preparation of an Environmental Assessment (EA) or Environmental Impact Statement (EIS).

At any time, a DSS user – especially if they are a project proponent who is not an EP&HP subject matter expert – can request assistance from a qualified NEPA practitioner in completing the DSS review steps. All information entered by a project proponent is reviewed by an environmental reviewer with NEPA training and experience before a project is recommended for approval by the approving official. With all transmittals and approvals occurring electronically, significant processing time will be saved, especially when the project proponent and the environmental reviewer are geographically separated (e.g., when a project proponent is located in a Component

field or regional office and the environmental reviewer is located at a DHS or Component Headquarters office).

The DHS' Office of Occupational Safety and Environmental Programs (OSEP) has developed and is implementing the DSS. The DSS resides on a secure server behind the DHS firewall that can be accessed by anyone with a dhs.gov or uscg.mil email address. Development of the DSS began in Fiscal Year (FY) 2005 and when deployed will meet IT security requirements and Section 508 of the Americans with Disabilities Act. The DSS has gone through an initial development version and a Beta version. Both versions were tested by prospective users in all Components and the DSS was refined based on testers' recommendations to develop production Version 1. Production Version 1 is being deployed in the summer of 2011. Work on Version 2 has already begun. In FY 2012, the use of the DSS will be mandatory for use by all Components for CATEX-level actions requiring a REC, except for FEMA's financial assistance programs. It is anticipated that use of the DSS will be mandatory across the entire Department by FY 2013.

To date, approximately \$1 million, plus significant staff time, has been spent on development and initial deployment of the DSS. Additional funding will be used in FY2012 for the deployment of Version 2. At present, system development requires approximately 30% of one staff member's time. In FY 2013, the DSS will transition into operation and maintenance, including the use of one full time staff member to serve as system administrator. A cross-Component DSS User Group will be established to guide continued refinement of the system.

The DSS supports the Administration's policy of ensuring compliance with NEPA and conducting NEPA reviews in a timely, transparent, and cost-effective manner.