

# Appendix B

## Coding Structure

Presented below is the list of categories or “codes” used to sort public comment on the CEQ Review of NEPA. A more detailed description of the coding, database construction, and other elements of the methodology used for this analysis can be found in Appendix A: Content Analysis Process.

### **CEQTF 00000 CEQ Review of the NEPA Process**

- 00100 NEPA Task Force
  - 00110 Purpose and need
  - 00120 Composition of task force
  - 00130 Trust and integrity
  - 00140 Timeline for review
- 00200 Trust and Integrity of the CEQ review of the NEPA process
- 00300 Public Involvement in the CEQ review of the NEPA process
  - 00310 Length of comment period
  - 00320 Outreach/agency communication efforts
  - 00330 Use of website for public comment
  - 00340 Use of public comment in final decision
- 00400 Existing authorities (*the agencies that should be involved in this, etc.*)
  - 00410 NEPA needs to change, not just the regulations
- 00500 Decisionmaking authority
- 00600 Relationship to existing laws, regulations, and policies
- 00700 Environmental considerations of reviewing the NEPA process
- 00800 Socioeconomic considerations of reviewing the NEPA process
- 00900 Other

### **PROCS 10000 NEPA/Planning Processes General**

- 10100 Purpose of NEPA/planning processes
  - 10110 Guiding direction/philosophy
- 10200 NEPA/planning implementation (*of NEPA/planning processes in general—e.g., consistency of implementation*)
  - 10210 NEPA/planning funding
  - 10220 NEPA/planning evaluation (*i.e., evaluation of NEPA/planning processes*)
  - 10230 NEPA/planning document preparation
  - 10240 Use of best available research/information
  - 10250 Staffing/training
- 10300 Decisionmaking authority (*of NEPA/planning processes in general*)
  - 10310 Role of government entities
  - 10320 Role of interest groups
  - 10330 Role of general public
- 10400 Public involvement (*for technology-based comments, code to AAAAA*)

- 10410 Agency outreach efforts
- 10420 Use of public comment
- 10430 Collaboration
- 10440 Trust and Integrity
- 10500 Relationship to other processes
  - 10510 Relationship to other planning processes general
  - 10520 Relationship to other laws, regulations, and policies
- 10600 American Indian interests
- 10700 Environmental considerations of NEPA/planning processes general
- 10800 Socioeconomic considerations of NEPA/planning processes general
- 10900 Other

#### **AAAAA 20000 A: Technology, Information Management, and Information Security**

- 20100 Sources of existing data and background studies to prepare or comment on NEPA analyses (A1)
  - 20110 Species or wetland inventories
  - 20120 Air quality data
  - 20130 Field surveys
  - 20140 Predictive models
  - 20150 Trend analyses
  - 20160 Other
- 20200 Barriers or challenges faced in using information technologies in the NEPA process (A2)
  - 20210 Factors considered in assessing and validating the quality of the information (*Adequacy of Analysis*)
- 20300 Internal databases and other sources of environmental information for environmental analyses (standing information vs. project specific information sources) (A3)
  - 20310 Protocols and standardization efforts in the development of databases
  - 20320 Protocols and standardization efforts in the maintenance of databases
- 20400 Information management and retrieval tools used to access, query, and manipulate data (incl. functions and characteristics of the system) (A4)
- 20500 Preferred methods of conveying or receiving information about proposed actions and NEPA analyses and documents (A5) (*one-way method of information delivery—from agency to public—e.g., CFR, CDs, accessing & downloading web-accessed files*)
  - 20510 Disseminating environmental information
    - 20511 OBJECTIONS OR CONCERNS RELATING TO THESE TOOLS
- 20600 Information management technologies used in communicating with stakeholders (*i.e., any interested party*)(A6) (*general comments regarding two-way communication between agency and public*)
  - 20610 Incorporating environmental values into agency planning and decisionmaking
    - 20611 OBJECTIONS OR CONCERNS RELATING TO THESE TOOLS

- 20700 Balancing public involvement and information security (A7) (*how to involve the public without compromising national security*)
- 20800 Internet-based public involvement (*electronic methods of public/agency interaction; e.g., comment & response to comment*)
  - 20810 Environmental justice
  - 20820 Computer security
  - 20830 Communication quality
  - 20840 Technological alternatives (e-voice/video/chat rooms/discussion groups/bulletin boards/etc.)
- 20900 Other

**BBBBB 30000 B: Federal and Inter-Governmental Collaboration**

- 30100 Characteristics of an effective joint-lead or cooperating agency relationship/process (B1)
  - 30110 Training
  - 30120 Funding
  - 30130 Documentation
  - 30140 Trust
  - 30150 Other
- 30200 Barriers or challenges hindering the ability to enter into effective collaborative agreements that establish joint-lead or cooperating agency status (B2)
  - 30210 Differences in agency policy
  - 30220 Funding limitations
  - 30230 Personnel limitations
  - 30240 Public perceptions
  - 30250 Public trust
  - 30260 Other
- 30300 Training emphasis to facilitate joint-lead and cooperating agency status (B3)
- 30400 Managing and responding to public comments
- 30500 Best practices for inter-governmental collaboration
- 30600 Changes to agency/CEQ guidance
- 30700 Changes to CEQ regulations
- 30800 Other

**CCCCC 40000 C: Programmatic Analysis and Tiering**

- 40100 Issues best addressed by programmatic review (C1)
  - 40110 Methods used to address issues in programmatic analysis to avoid duplication in subsequent tiered analysis (C1)
- 40200 Examples
  - 40210 Examples of good programmatic analyses (*general best practices*)
  - 40220 Examples of good programmatic analyses used to develop, maintain, and strengthen environmental management systems (C2)
  - 40230 Examples of existing environmental management systems facilitating and strengthening NEPA analysis (C2)

40231 SYSTEMS CERTIFIED UNDER ISO 14001 (*INTERNATIONAL STANDARDS ORGANIZATION*)

40232 OTHER

40300 Barriers to effective use of program analysis

40400 Changes to agency/CEQ guidance

40500 Changes to CEQ regulations

40600 Other

**DDDDD 50000 D: Adaptive Management/Monitoring and Evaluation Plans**

50100 Factors considered in deciding to use an adaptive management approach (D1)

50110 Barriers to integrating adaptive management with NEPA

50120 Barriers to effective monitoring

50130 Barriers to effective feedback mechanisms

50140 Public Trust

50150 Other

50200 Methods to structure environmental impact analyses to consider adaptive management (D2)

50300 Aspects of adaptive management that may or may not require subsequent NEPA analyses (D3)

50400 Factors that should be considered when determining appropriate monitoring techniques and levels of monitoring intensity (D4)

50410 Cost

50420 Timing

50430 Staffing needs

50440 Environmental risks

50450 Other

50500 Characteristics of current monitoring activities (D4)

50510 Cost

50520 Timing

50530 Staffing needs

50540 Environmental risks

50550 Other

50600 Best practices for adaptive management

50700 Changes to agency/CEQ guidance

50800 Changes to CEQ regulations

50900 Other

**EEEE E: Categorical Exclusions**

60100 Requirements or conditions for establishing categorical exclusions (information, data, studies, etc.) (E1)

60200 Interagency review of another's categorical exclusion in order to establish a similar categorical exclusion (E2)

60300 Improvements needed in the process of establishing new categorical exclusions (E3)

60400 Public involvement and categorical exclusions

60500 Barriers to establishing categorical exclusions

- 60600 Best practices for establishing categorical exclusions
- 60700 Changes in agency/CEQ guidance
- 60800 Changes to CEQ regulations
- 60900 Other

**FFFFF 70000 F: Additional Areas for Consideration (to improve/modernize NEPA practices)**

- 70100 Environmental assessment documents
  - 70110 Appropriate use of documents
  - 70120 Structure or format of documents
- 70200 Other NEPA documents
  - 70210 Appropriate use of documents
  - 70220 Structure or format of documents
- 70300 Additional CEQ guidance
- 70400 Other changes in CEQ regulations
- 70500 Other

**ATT 99999 Attachments**

**Alternative Codes**

- A1 Question A1
- A2 Question A2
- A3 Question A3
- A4 Question A4
- A5 Question A5
- A6 Question A6
- A7 Question A7
- B1 Question B1
- B2 Question B2
- B3 Question B3
- C1 Question C1
- C2 Question C2
- D1 Question D1
- D2 Question D2
- D3 Question D3
- D4 Question D4
- E1 Question E1
- E2 Question E2
- E3 Question E3

# Demographics Codes

## Organization Type

### **Government Agency**

FA	Federal
NA	International
SA	State
CA	County
TA	Town/City
QA	Tribal
XX	Regional/Other Government Agency

### **Elected Officials**

FE	Federal
NE	International
SE	State
CE	County
TE	Town/City
QE	Tribal

### **Interest Group (includes legal representatives of interest groups)**

A	Agriculture Industry
B	Business (and business associations)
D	Place-Based Group
E	Government Employee/Union
G	Domestic Livestock Industry
H	NEPA Professional or Association – Private Sector
I	Individual (or unidentifiable respondent)
J	Civic Group
K	Special Use Permittee (or contract holder)
L	Timber or Wood Products Industry
M	Mining Industry
O	Oil, Natural Gas, or Coal Industry
P	Preservation/Conservation Organization
R	Recreational Organization (motorized/non-motorized, non-specific)
U	Utility Industry
X	Conservation District
Z	Multiple Use or Land Rights Organization
AA	Human Resource Interest (prisons, housing, education, food and drugs, Job Corps)
BB	University/Academic
CC	Defense-Related Industry (regardless of resources used by industry)
DD	Chemical Industry
EE	Commercial Fishing Industry

FF	Transportation Interest (including highway, rail, air, sea)
GG	Communication Interest (airways, telephones, Internet providers)
CH	Church/Religious Group
LO	Private Land Owner (must specify that they have inholdings or land contiguous with federal land)
QQ	Tribal Member or Non-Government Tribal Organization
RC	Recreational/Conservation Organization (e.g. Trout Unlimited, Elk Foundation, Ducks Unlimited)
CR	Civil Rights Group
Y	Other (unidentified organization type)

### Number of signatures

A numeric count of the number of signatures on a response

### Response Type

1. Letter or other individually written response
2. Form/letter generator
3. Resolution (generally from local government such as a county commission)
4. Action alert (NGO constituent comment guide)
5. Transcript (dictated audio, video, telephone response)

### Delivery Type

- E – E-mail
- F – Fax
- H – Hand delivered/oral testimony (personally delivered)
- M – Mail or commercial carrier (FedEx, UPS, includes video, audio, letter format)
- T – Telephone
- U – Unknown
- W – Internal web site

### Early Attention

1. Threat of harm
2. Notice of appeal/litigation
3. Freedom of Information Act (FOIA)
4. Provides case study or best practice
5. Requires detailed review/well-written/enclosures
6. Government entity
7. Request public hearing or open house
8. Request copy of the Federal Register notice
9. Other requests for specific information

### Organized Response Campaigns

Organized Response Campaign letters are identified as 5 or more identical letters from different people.

Each type of organized response campaign letter receives an identifying number.

## Requests for Information

- A Mailing list only – no text
- B Request for confirmation of receipt
- C Request for hard copy of summary of report and/or best practices
- D Request for full CD version of report and/or best practices

## Comment Extension Request

- 0 No specific time or other than below
- 15 Request for 15 day extension of comment period
- 30 Request for 30 day extension of comment period
- 45 Request for 45 day extension of comment period
- 60 Request for 60 day extension of comment period
- 90 Request for 90 day extension of comment period
- 120 Request for 120 day extension of comment period