

Revolutionizing NEPA Comment Analysis: General Scoping

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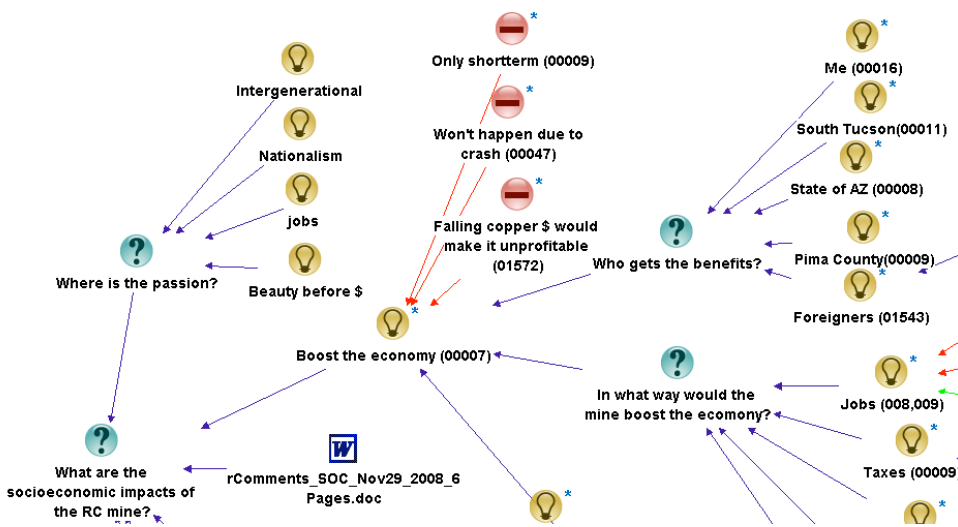


Figure 1: A sample “comment map” using Compendium.

CONTEXT FOR COMMENTS

Today, we will talk about the specific problem of analyzing public comments made during the general scoping phase of the NEPA process. This has to be considered in the broader context of public commenting, which we often see as an expensive reinforcing cycle of public disenfranchisement and agency frustration. To improve this

important aspect of public participation, an agency might:

- Design decision-making processes that are robust and conducive to elicitation and use of good comments. This requires using a common platform for decision-making and outreach;
- Include education. Education with feedback should be a thread in everything that is done as well a

stand-alone aspect of the comment design;

- Advertise commenting opportunities and reach beyond the circle of cognoscenti;
- Design elicitation of comments that is graphically pleasing, written in plain language, presented on and off the web; offer people experience within the planner’s frame and for the web version, include instantaneous feedback on at least some of the commenting;
- Offer timely, engaging, clear feedback on the comments with the option, as appropriate, of involving the public in the analysis and summary of the public’s materials;

• Address the comments and incorporate them into the subsequent work in a clear and traceable manner;

- In each of these steps, offer design alternatives that work at different scales (the local sewage plant siting or the national rulemaking) and that offer a range of face-to-face and technological approaches.

Carie and Philip, with the support of the Institute, have made some interesting progress on all these

Much of our thinking about comment analysis arose from our experience with the BLM’s Western Oregon Plan Revisions, where they received approximately 10,000 submissions regarding their Draft Environmental Impact Statement. The Univ. of Colorado, working through the U.S. Institute for Environmental Conflict Resolution and Fox Mediation, analyzed the comments using several techniques.

The report, *Learning from Public Comments: Insights from the Western Oregon Plan*, can be found at <http://www.ecr.gov/pdf/LearningFromPublicComments.pdf>

items--see, for instance, www.gsnmvibe.ecr.gov--our priority at the moment is comment analysis, the topic of today's session.

Public commenting is a system, so if we fix one item without improving them all, we are just cranking more efficiently towards disaster. For instance: if you succeed in increasing the number and quality of comments you receive, yet you haven't figured out what you are going to do with those comments, you've just made things worse. If the public commenting system is as moribund as we fear, then all aspects of the system need to be tended to.

But if there is one link that is more equal than the others, it is the feedback on the feedback: comment (or 'content') analysis. The reason comment analysis is so important is that it goes back to the very most basic mediation principle: active listening. We define "active listening" as listening in which (a) the listener understands what the speaker is saying and (b) the speaker knows that the listener understands what s/he said. It is a complete loop.

What makes active listening so great?

First, we know from experience that when a speaker gets feedback "I heard you, and this is what I understood," then s/he often will shift to a less combative frame--more relaxed, more able to listen, possibly more creative.

Second, the completed communication loop creates a "learning system." The listener is getting feedback about how well s/he listens; the speaker is getting feedback about how well s/he speaks. They teach one another to speak and listen better.

This is what we think is missing with commenting and comment analysis under NEPA. Because of the delays and distortions in the

feedback, the public is part of an un-learning system.

So what would a good feedback--comment analysis--system look like? It needs to:

- Meet legal requirements;
- Be efficient and timely;
- Complete the feedback loop, e.g. by collaborating or at least calibrating portions of the comment organization and summary;
- Deal with repetition in a way that is satisfying for the "speaker" (the public) and the "listener"--the agency.
- Summarize the comments in a manner that captures the passion as well as the substance.
- Provide different types of design opportunities depending on the situation.

One approach--the one we discuss today--is to "map comment space" using Issues-Based Information Systems. (For more information about IBIS, we recommend Jeff Conklin's book, *Dialog Mapping* in tandem with the excellent shareware, Compendium.)

The experiment we present today is "mapping comment space." In combination with topic-based computer sorting, we are exploring this as a promising technique for comment analysis that also has the potential to be done collaboratively with the public. It allows for flip-chart and nonstinky pen activities in workshops, for asynchronous collaborative web work, and for a range in collaboration approaches. The range extends from having comment analysts prepare the maps and then validate with the public to actually building the maps collaboratively.

Then the question is: how well do these maps work as a basis for comment summaries?



A classic example of delayed feedback is the 'shower on third floor, water heater in basement. problem.' It's not clear which way is hot and which way is cold on the shower handle. You turn it to hot, and nothing happens. You turn it to cold, and by that time the hot is coming though the pipe. So you think--for a while--that cold means hot. The delay creates a false learning situation.

Learned helplessness happens when a person is bombarded with negative experiences over which s/he has little or sporadic control. To induce learned helplessness in subjects, experimenters essentially create a delayed and distorted feedback system. Learned helplessness can affect groups rather than individuals--the group performs less well after induced learned helplessness but the members of the group are unaffected when tested separately.

We think it is interesting to consider learned helplessness as a metaphor for the electorate and the commenting public. It would be fair, as well, to consider the toll on the agency folk who must take the product of bad learning systems and try to make sense of it.

NB: these materials were prepared by Carie in collaboration with Philip, Kimberly, & Larry Fisher, Senior Program Manager at the Institute.