

## Section C

### Description/Specifications/Work Statement

#### C.1. General Information.

##### C.1.1. Instructions to BPA Holders

If the deliverables will take longer than 2 weeks to complete the comment period, please provide the additional cost as an option item. Assume all subtasks listed in the delivery table (Table 2) will be required for the comment period.

##### C. 1.2. Introduction and Background.

This project will provide content analysis of comment submissions on the **Alaska Roadless Rule**. The project will consist of 1 individual comment period. The comment period, the estimated number of unique letters, and the anticipated start of the comment period are listed in the table below.

Table 1: Comment Period Information

Comment Period Name	Unique Pages	Anticipated Start of Comment Period	Comment Period Duration
DEIS	956	October 2019	60 days

Assume 100 submissions per comment period will be sent to the contractor for manual entry into CARA. Others will be provided electronically (via email, web-form, MS Word document or scanned pdf).

The Forest Service's Comment Analysis and Response Application (CARA) database will be used for this project. This software will be used for any letter entry, comment coding, and drafting of concern responses. The Forest Service will work with the contractor to provide access to the CARA system.

CARA automatically enters comments received via the public web form in CARA, which features batch uploading of emails, automated form sorting, and online entry of hard copy letters, coding, and public concern writing and linkage to comments.

##### C.1.3. Scope of Work.

C.1.3.1. The purpose of this work is to analyze all comments received during the official comment period (see Table 1) following procedures as specified in Table 2.

C.1.3.2. The base period of performance for this Task Order is October 18 , 2019- December 30, 2019. The Contracting Officer may extend this period, based on need and funding.

C.1.3.3. Upon issuance, the Contractor shall consider receipt of the Task Order as the Government's Notice to Proceed.

## **C.2. Definitions.**

C.2.1. Duplicates, forms, form masters, forms-plus, unique: Every submission is classified for processing either as a duplicate (letters with the same text and same author), form letter (letters with the same text, but different authors), a form master (the form copy that is coded), a form-plus (a form with codeable comment(s) added), or unique (everything else). See Attachment 1 for details and examples of these types of written comments).

C.2.2. Letters and submissions are synonymous terms used interchangeably in this Task Order. They refer to all submissions received in response to the Government's request for comments.

C.2.3. Originals. Originals are submissions as received from commenters.

C.2.4. Delivery types. Submissions will be received via email and web-form and hard copy.

C.2.5 Supporting Documentation: Formerly known as attachments.

## **C.3. Government-Furnished Property and Services.**

C.3.1. The contractor shall return all deliverables and comment letters to the assigned Government COR.

C.3.2. Should the Contractor require additional training from the NEPA Services Group (NSG), the Contractor shall compensate the Agency for time, travel and accommodations, based on the federal per diem rate for the location where training is to be conducted. Web-conference training for CARA may be presented when the project begins.

## **C.4. Requirements.**

C.4.1. General Requirements.

Subtasks listed in Table 2 are the requirements of this Task Order.

C.4.2. Minimum Acceptable Requirements.

C.4.2.1. Minimum Acceptable Requirement percentages for Subtasks are specified in Table 2 column (f). Inspection criteria are not limited to the Description and Requirements specified in Table 2 column (e).

C.4.2.2. Minimum Acceptable Requirement for Contract Items are based on the Minimum Acceptable Requirements for applicable Subtasks (see Table 2).

Failure to meet Minimum Acceptable Requirements on any subtask shall result in a non-compliance and unsuitability rating for the relevant Contract Item on the Contractor Inspection Report. In the event of a non-compliance and unsuitability rating, the Contractor Inspection Report stating specific concerns and report of findings will be communicated to the Forest Service Contracting Officer administering this Task Order. Copies of the Contractor Inspection Report and documentation of performance will be furnished to the Contractor to assist in producing effective resolutions and remedies.

### C.4.3. Schedule and Due Dates.

Table 2 column (d) specifies the Government's minimum acceptable due or delivery dates. Unless otherwise noted, due dates are measured in calendar days from the Call award or the last day of the Comment Period. Due dates are by close of business, Mountain Time.

**TABLE 2: Delivery Table for Each Comment Period**

SUBTASK (for each comment period)		DELIVERABLES	SCHEDULE (CALENDAR DAYS UNLESS OTHERWISE NOTED)	DESCRIPTION AND REQUIREMENTS	MINIMUM ACCEPTABLE QUALITY
(a)	(b)	(c)	(d)	(e)	(f)
2a	Enter Letter Information	Submitters' contact information, letter attributes, and comment text in CARA.	Information entered no later than COB on 2 <sup>nd</sup> day letter is received by contractor.	<p>For letters not already entered into CARA, contact information will be entered manually.</p> <p>Include submitter's first and last name, organization name, letter text, attachments (if applicable), delivery type, date submitted, and preferred contact method (email or USPS). As it is Non-Public Information (NPI), enter the submitters' contact information (name, address, email, ect) into the fields provided within CARA and not within the body of the comment text.</p> <p>If letters contain attachments with project specific comments from the commenter, enter text of the attachment into the "letter text" box in CARA.</p> <p> Transcripts from the 15 Subsistence Hearings will be uploaded (by the client) into the CARA comment period labeled "Other" with the description "Subsistence"</p>	Any errors discovered are corrected within 2 business days
	Remove NPI	Uploaded hardcopy submissions are free of NPI	Completed before letters are available in the reading room	<p>This does not apply to submissions that occur directly through the CARA system.</p> <p>After ensuring the NPI is posted to the appropriate CARA fields, delete it from the Letter Text Box.</p> <p>Remove NPI from attachments.</p> <p>Guidance on how to remove NPI is in section 3a-c of the eMNEPA PII Protection Job Guide</p> <p>Assigned CARA letter number is written or stamped in the upper right corner of all hardcopy submissions.</p>	Any errors discovered are corrected within 2 business days

**TABLE 2: Delivery Table for Each Comment Period**

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<b>SUBTASK (for each comment period)</b>		<b>DELIVERABLES</b>	<b>SCHEDULE (CALENDAR DAYS UNLESS OTHERWISE NOTED)</b>	<b>DESCRIPTION AND REQUIREMENTS</b>	<b>MINIMUM ACCEPTABLE QUALITY</b>
<b>(a)</b>	<b>(b)</b>	<b>(c)</b>	<b>(d)</b>	<b>(e)</b>	<b>(f)</b>
				Time spent masking NPI is tracked and reported to client	
3a	Create Coding Structure	Coding Structure in CARA	As agreed to by COR	<p>Propose coding structure to present to client and COR.</p> <p>Coding structure may incorporate additional categories identified by the client. These categories must also include:</p> <ul style="list-style-type: none"> <li>• A category for attachments that provide a brief summary of the content of the attachment (see subtask 3b)</li> </ul> <p>Attend meeting with client and COR to discuss any modifications. The coding structure and any subsequent changes must be provided to the COR for approval prior to use.</p> <p>Coding Structure for Subsistence Hearing Transcripts is provided in Attachment 2.</p>	COR acceptance

3b	Identify and Code Comments	Coding status of all letter shown as “complete” in CARA	Begin no later than: 15 days into comment period. All letters coded no later than 5 business days from close of comment period.	<p>Identify all codeable comments, including where comments begin and end.</p> <p>Attachments to letters must be identified and the content of the attachment summarized in one or two sentences. One way to approach this is to include the title of the attachment(s) at the end of the original letter, code the title, and include the summary as an “annotation” to the comment. This will aid in producing a report that contains the attachment title and their summaries.</p> <p>Code comments in CARA using COR-approved coding structure. CARA features an auto-markup function that flags potential early-attention letters. Each flag needs to be verified as an early attention letter. False positives should be cleared by the contractor each day. Client should check the early attention letters daily. Contractor should give coding priority to verified early attention letters.</p>	Any errors discovered are corrected within 2 business days
4a	Comment Summary: Public Concerns	Status of all concern statements shown as “ready for response” in CARA	Due (from close of comment): 5 days: draft 10 days: final	<p>In CARA, summarize comments by identifying, composing, and organizing public concerns and subconcerns, with sample statements from original comment text. All grouped comments must be linked to a public concern.</p> <p>Contractor will provide a written summary using the outline below and including quantification of coded comments</p>	Any edits requested by client are incorporated within 2 business days
4b	Content Analysis Datasheets	Excel Document	<p>Due (from close of comment): 10 days: Final</p> <p>Drafts provided on request from COR.</p>	<p>Excel document(s) with columns identified by the client will be formatted for ease of printing on 8.5 x 11 paper.</p> <p>Separate document provided for Subsistence Hearing Transcripts.</p>	COR Acceptance

4c	Content analysis report	Word Document	<p>Due (from close of comment): 5 days: Interim 10 days: Final</p> <p>Drafts provided on request from COR.</p>	<p>Clear, concise overview of key ideas summarized from the concerns, including sample statements. Anticipate an estimate of 250 paraphrased or summarized comments.</p> <p>Separate summary provided for Subsistence Hearing Transcripts (See below Subsistence Hearing Transcripts (beginning on page 9) for Summary Outline).</p>	<p>Good or excellent (see scoring rubric)</p>
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## **Section I**

**I.1.** Should the actual number of submissions received be greater or less than the estimates specified in C.1.1, costs will be revisited based on the difference between the estimated and actual amounts and the characteristics of the amount difference.

## **Attachment 1: Submission Types – Definitions**

**Comment letter:** A submission that contains comments: deliverable by email, mail, fax, web form, ect.

**Comment:** A point made in a letter. Letters can contain many comments.

**Unique letter:** Being the only one of its kind; unlike any other letter received.

**Petition:** Cover letter with signatures- We consider a petition any letter that then has a set of signatures attached (not multiple signatures on the letter, but actually attached to the letter).

Names and/or contact information will not be entered into the CARA database for each person signed onto the letter in the attachment. A response (if warranted) would only be provided to the individual that signed (or sponsored) the letter and it is their responsibility to disseminate that information to those on the petition. Examples of this are cover letters expressing/supporting an opinion with a spreadsheet attached with names, contact information (not required) and a comment in agreement with the overall comments in the cover letter.

**Form Letter (duplicate letter):** A form letter is any letter type (email, attachment, excel, hard copy) that contains the exact same information as another letter, except for the commenter's name (who it is from).

To ensure each form letter is coded correctly into the database, it is advised that they are entered individually (not as large batch attachments). When form letters are attached in batches to one entry they may not be numbered in the way the submitters have anticipated.

The stereotypical form letter is from a special interest group that creates a letter and their followers all submit that letter, or post cards with pre-written text that is duplicate of other post cards.

**Form Plus:** A form plus letter is any letter type (email, attachment, excel, hard copy) that contains the exact same information as another letter, except for the commenter's name (who it is from) and a few sentence that disqualify the letter for sorting as a Form Letter.

To ensure each form plus letter is coded correctly into the database, it is advised that they are entered individually (not as large batch attachments). When form letters are attached in batches to one entry they may not be numbered in the way the submitters have anticipated.

The stereotypical form plus letter is from a special interest group that creates a letter or post card and their followers all submit that letter and the submitter has added a statement such as "thank you for taking the time to work on this project".

**Substantive formal comment** is defined as "*within the scope of the proposal, have a direct relationship to the proposal, and include supporting reasons for the responsible official to consider*" (36 CFR 219.62).

## **Attachment 2: Subsistence Hearing Transcripts**

1. Written transcripts from the 15 subsistence hearings will be scanned and loaded into a separate comment period in CARA (by Client) to be coded by Contractor. The transcripts (est 400 pages) will be coded using the structure below.

### **Coding Structure**

#### *Procedural Concerns*

- 1.1 Notification
- 1.2 Involvement
- 1.3 Hearings
- 1.4 Other Procedural Concerns

#### *Subsistence Resource Concerns*

- 2.1 Competition – concerns about competition for subsistence resources
- 2.2 Abundance – concerns about abundance or availability of subsistence fish, wildlife, and vegetation resources
- 2.3 Access – concerns about access to subsistence resources including transportation concerns
- 2.4 Availability – concerns about availability of other lands for the purpose to be achieved
- 2.5 Options – concerns about other alternatives that would reduce or eliminate lands needed for subsistence resources
- 2.6 Monitoring – concerns about the monitoring of subsistence resources
- 2.7 Geographic – concerns about specific geographies impacted by roadless rulemaking
- 2.8 Other – other concerns about subsistence resources
- 2.9 Non-substantive comments

#### *DEIS and Related Analysis Concerns*

- 3.1 Key Issues – concerns regarding key issues
- 3.2 Alternatives – concerns about alternatives
- 3.3 Effects Analysis – concerns regarding effects to environment
- 3.4 Other – Other concerns about the DEIS

2. Contractor will provide a written summary using the outline below and including quantification of coded comments.

### **Summary Outline**

#### *Introduction/Overview*

#### *Methodology*

#### *Summary – Procedural, DEIS and Related Analysis, and Subsistence Resources*

##### *Subsection 1 – Procedural Concerns*

- a) Notification
- b) Involvement
- c) Hearings
- d) Other procedural concerns

##### *Subsection 2 – Subsistence Resource Concerns*

- a) Competition – concerns about competition for subsistence resources
- b) Abundance – concerns about abundance or availability of subsistence fish, wildlife, and vegetation resources
- c) Access – concerns about access to subsistence resources including transportation concerns
- d) Availability – concerns about availability of other lands for the purpose to be achieved
- e) Options – concerns about other alternatives that would reduce or eliminate lands needed for subsistence resources
- f) Monitoring – concerns regarding the monitoring of subsistence resources
- g) Geographic – concerns regarding specific geographies impacted by roadless rulemaking
- h) Other – other concerns regarding subsistence resources
- i) Non-substantive comments

##### *Subsection 3 – DEIS and Related Analysis Concerns*

- a) Key Issues – concerns regarding the development and analysis of key issues
- b) Alternatives – concerns regarding the development of alternatives
- c) Effects Analysis – concerns regarding the analysis of alternatives and final determinations
- d) Other – Other concerns regarding the DEIS

### Attachment 3: 60 day Public Comment Period

a. Estimate of comments by type:

Type of Comment	Estimated Amount	
Unique Letters	1,500	
Form Letters	100 master forms letter	37,000 total
Form Plus		600 total
Petitions	10 cover letters with petitions	16,000 number of signatures

- See attached for definitions/descriptions

b. **Entry**- hard copies including post cards

- Mailed to contractor once weekly until the close of the comment period. For five days following the close of the comment period, mailings will occur daily. Hardcopies (postmarked within the comment period) received more than five days past the close of the comment period, will be uploaded to CARA by the client before being mailed to the contractor.
- Contractor will scan and include as attachments in CARA.
- CARA assigned letter number stamped or written in the upper right corner of hard copies.
- All address information is populated in the CARA entry fields but not in the body text section of the CARA form

c. **Coding**

d. **Attachments**

- When copy and pasting from an attached letter please use the following disclaimer: *The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics or tables from the attached original.*
- Attachments to letters must be identified and the content of the attachment summarized in one or two sentences. One way to approach this is to include the title of the attachment(s) at the end of the original letter, code the title, and include the summary as an “annotation” to the comment.

e. **Emails**

- Emails will be batched and uploaded by Client then coded by contractor. Client will mask NPI.

f. **Federal Regulation.gov (fdms extracts)**

- Process the same as email uploads

g. **Outputs**

- Issues** statements
  - Estimate 250 issue, or concern, statements
- Summary**
  - need to include a breakdown of type of comments.

Type of Comment	Amount received	
Unique Letters	Xxx,xxxx	
Form Letters	XX master forms letter	X total
Form Plus	Xx master form pluses	X total
Petitions	XX cover letters with petitions	Xxx number of signatures

a. For petitions provide CARA number of cover letters as well as number of signatures per petition.

CARA number	Amount received
12345	10,000 signatures
98783	50 signatures
9887654	586 signatures

Demographics- how many comment from what states/zip codes and how many people did not include a state.



## **Attachment 4: Preliminary Coding Structure**

### **802.01 Environmental – General**

- 802.01A Protect & Preserve (spaces won't be around forever)
- 802.01B Forests don't need managed
- 802.01C Tribal Input Required
- 802.01D Protect Environment from Industry (environment more important than industry)
- 802.01E Benefits of Nature (climate, spiritual)
- 802.01F Forest belongs to the people
- 802.01G Rule favors industry over environment

### **802.02 Environmental – Ecosystem**

- 802.02A Forest value as ecosystem (value notes, preserve for future)
- 802.02B Old growth sequesters carbon (spec. to carbon sink, carbon sequestration)
- 802.02C Healthy environment good for economy
- 802.02D Logging/Roads hurt ecosystem (general)
- 802.02E Government has obligation to protect
- 802.02F Rule favors industry over environment (specific ecosystem information)
- 802.02G General climate change information
- 802.02H Roadless Rule prevents damage; removing is bad precedent
- 802.02I General old-growth/environment (not specific to climate change or rule)
- 802.02J Chugach ecosystem
- 802.02K Specific Areas for Protection
- 802.02L Cultural Significance (specific focus on meaning to indigenous peoples)

### **802.03 Environmental – Fish**

- 802.03A Construction Degrades Fish Habitat
- 802.03B Roadless Rule Maintains Habitat
- 802.03C Healthy Forests Vital for Fish Populations
- 802.03D Tongass 77 Critical to Fish Habitat
- 802.03E Irreversible Damage to Ecosystems
- 802.03F Effect of Climate on Fish Habitat
- 802.03G Tongass is Pristine Fish Habitat

### **802.04 Environmental - Hunting**

- 802.04A Game Population
- 802.04B Rule Restricts Subsistence

802.04C Wilderness Essential to Communities

802.04D Access Increases Hunting Pressure

**803.02 Economic - Tourism**

803.02A Protecting Wild/Salmon Protects Tourism

803.02B Visitors Want Pristine Wilderness

803.02C Intact and Tourism Worth More Than Logging

803.02D Exemption Will Cause Congestion

803.02E Supportive of Birdwatching Tourism

803.02F Tourism Statistics

803.02G Ecotourism Supports Livelihood

803.02H Other Transport Used, Roads Not Needed

803.02I Logging Roads Used by Tourists

**803.03 Economic - Timber**

803.03A Timber Market is Overseas

803.03B Subsidization of Timber Industry

803.03C - Forest Service Favors Timber

803.03D Economic Viability of Timber Industry

803.03E Economic Analysis of Timber Industry

803.03F Rule prevents successful timber industry

803.03G Public Interest Over Timber Profit

803.03H Short-term profit for long-term impact

803.03I Timber Industry Not Negatively Affected

803.03J Timber is not a driving economic force

803.03K Reducing Timber Affects the Economy

**803.04 Economic - Mining**

803.04A Rule Limits Mining

803.04B Rule Does Not Limit Mining

803.04C Access is Essential for Mining

803.04D Request Clarification for Mining Projects

**803.05 Economic - Access**

803.05A Rule Does Allow Access

803.05B Roads Needed for Certain Uses

- 803.05C Exemption Requests and Closure Concerns
- 803.05D Lack of Roads Affects Power Prices
- 803.05E Questions About Exemptions Not Mentioned
- 803.05F Access Not Valid Argument for Proposal

**803.06 Economic - Fish**

- 803.06A Economic Statistics for Fish Industry
- 803.06B Erosion Puts Salmon Industry at Risk
- 803.06C Protect Habitat to Protect Salmon Industry
- 803.06D Fishing Brings in Tourism Dollars
- 803.06E Salmon Protection Critical to Industry
- 803.06F Other State and Country Economies
- 803.06G General Statement about Salmon and Economy
- 803.06H Salmon Economics

**803.07 Economic - Industry**

- 803.07A Support Sustainable Industries
- 803.07B Roads Support Industry
- 803.07C Roads Detrimental to Multiple Industries
- 803.07D More Benefits to Sustainable Industry
- 803.07E Rule Did Not Affect Non-Timber Industry
- 803.07F Economic Analysis
- 803.07G Roadless Rule Hurts Economy
- 803.07H Sustainability Requires Roadless Rule
- 803.07I Roads Required for Environment/Safety

**805.01 State-Specific Rule**

- 805.01A Alaskans Should Have Control
- 805.01B Balance Economic Growth and Conservation
- 805.01C General Support for State-Specific
- 805.01D Oppose Alaska-Specific Rule
- 805.01E Rule Changes Would Be A Step Backward
- 805.01F Federal vs State
- 805.01G Management Should Be Federal

**805.02 No Action Alternative**

- 805.02A Leave Rule Intact
- 805.02B Leave National Parks Roadless
- 805.02C Value in Pristine Wilderness
- 805.02D No Action Because Against Logging
- 805.02E Collaborative and Supportive
- 805.02F National Forests are for All Americans
- 805.02G Rule Protects Water, Business, Wildlife
- 805.02H Support Protecting T77 and TNC/Audubon
- 805.02I Do Not Support T77 and TNC/Audubon
- 805.02J General Support for Roadless Rule

**805.03 Exemption Alternative**

- 805.03A General Opposition to Exemption
- 805.03B General Support for Exemption
- 805.03C National Rule Inappropriate for Tongass
- 805.03D Exemption Needed for Road Access
- 805.03E Exempt Chugach National Forest
- 805.03F Exemption Inhibits Conservation
- 805.03G Poor Precedent