



# **NEPA Pilot Project Final Briefing**

**BRS Stakeholder Meeting  
November 20, 2013**

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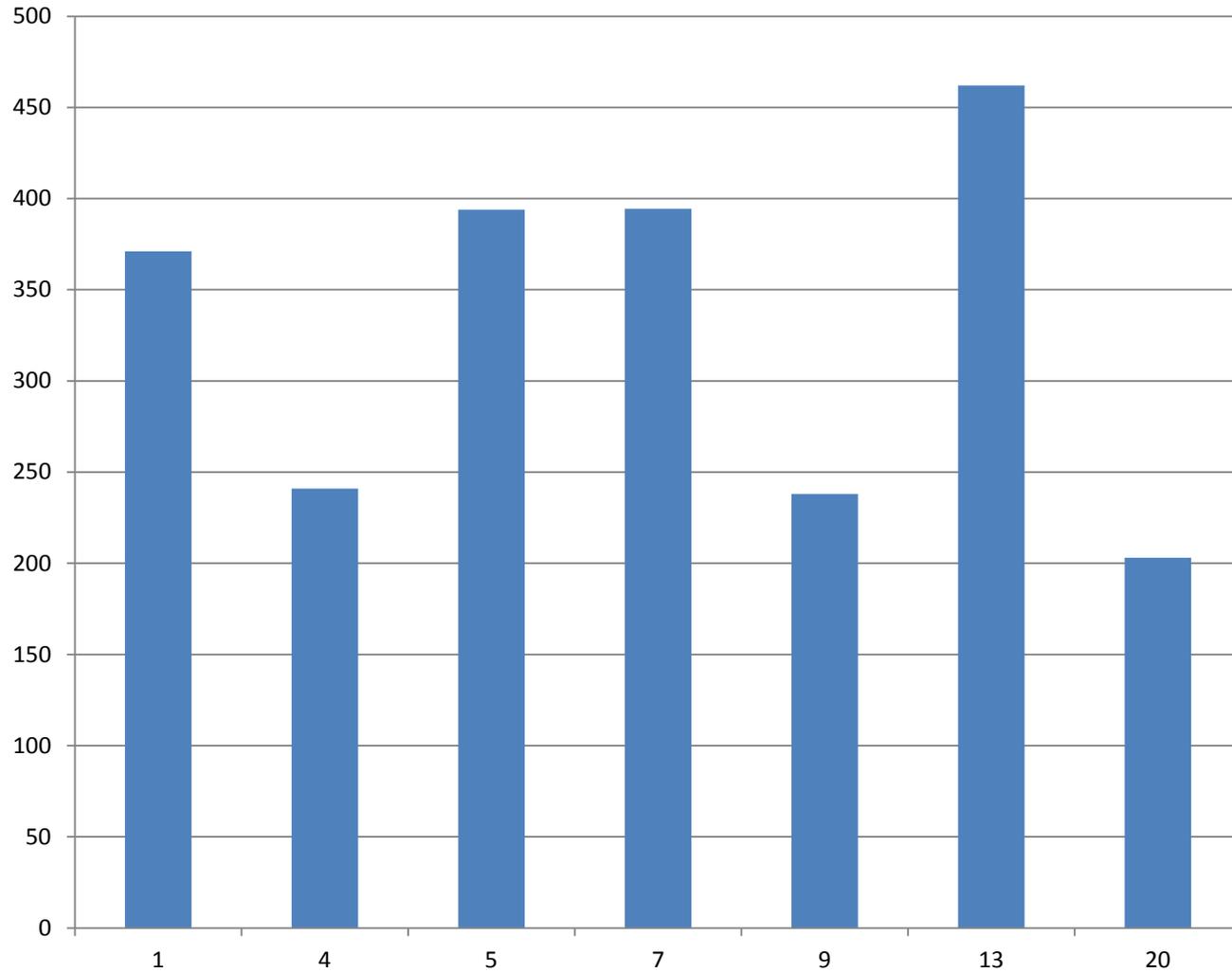
**Biotechnology Regulatory Services  
Animal and Plant Health Inspection Service**

# NEPA Pilot Project

- Data collection Dec 2011-Mar 2013
- Measured staff time to prepare NEPA analyses
  - In house and contracted
  - With and without ERs
- Used staff time as a measure of cost
- Goal to maintain or improve the quality of the EAs
  - Subjective measures



# Staff Hours Draft EA



# Staff Hours to Complete Draft EA

Average	330
Minimum	203
Quartile 1	239.5
Quartile 2	371
Quartile 3	394.25
Maximum	462



# Findings

- No significant differences in the number of staff hours between in house and contracted draft EAs
- No significant difference in staff hours between Environmental Report (ER) and no ER
- Nevertheless, well prepared ERs are useful



# Survey Results

- Surveyed staff and participants
- NEPA analysts valued ERs
  - Found quality variable
  - Suggested updating the guidance
- Participants thought that ERs did not save time, but could provide useful information
  - Data supports this observation
  - Suggested updating guidance

# Survey Results

- NEPA analysts thought that contractors were most effective for discrete tasks
  - Comment summary
- Participants supported the use of contractors

# Next Steps

- Engage pilot project participants on their interest in continuing to submit ERs
- Continue to develop current staff to maximize internal capacity to finish NEPA analysis
  - On pending petitions in FY14
  - Meet SOP timelines on new petitions by FY15





# Questions?

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