

## **Introduction to PEPC: Overview**

Welcome to the *Introduction to PEPC* e-course.

### **Why was this course created?**

The National Park Service (NPS) requires the use of the Planning, Environment and Public Comment (PEPC) system to facilitate compliance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), and NPS Director's Orders 12 and 28. This course was created to introduce the system to individuals needing a basic understanding of PEPC. You must first pass this e-course before you will receive a password and login to the PEPC system.

### **Who is this course for?**

This course is intended for all NPS employees, consultants, and contractors who will be using PEPC, regardless of whether you will be entering information directly into the system or simply reviewing the information entered by others. Individuals who require a more in-depth understanding of PEPC components may take additional e-courses that are targeted to their roles and responsibilities. This e-course serves as a prerequisite for those e-courses.

The *Introduction to PEPC* e-course assumes a basic understanding of NEPA/NHPA compliance issues as well as a familiarity with elements of both Internet browser and Windows computer interfaces. If you are unfamiliar with NEPA/NHPA or compliance in general, you should consult with your park compliance specialists and refer to the Director's Order 12 Web-based field guide.

### **How long will it take to complete this course?**

This course is designed for you to move through the information at your own pace. It begins with an explanation of the need for the PEPC system, followed by a review of the NPS Director's recommendation to use PEPC. It then considers the development history and major advantages of using the PEPC system. This course concludes with a brief discussion of the individual steps in PEPC. Depending on your familiarity with Web-based applications and computers in general, the course will probably take 1 to 3 hours to complete.

## Project Planning, Compliance & PEPC



For NPS employees and contractors, complying with NEPA has often been an intricate, complicated process. If NEPA guidelines are not followed effectively, the potential exists for delays in the completion of projects, the possibility of litigation, or the potential loss of overall funding for NPS projects.

Given the importance of incorporating compliance into project planning, management, and implementation, the NPS developed the PEPC system to structure, streamline, and track the compliance process for projects involving natural and cultural environments at our national parks. PEPC also helps the NPS collect, code, and respond to comments from the public about proposed projects.

PEPC is an online collaborative tool designed to facilitate the project management process in conservation planning and environmental impact analysis. It assists NPS employees in making informed decisions with regard to a number of compliance issues throughout the planning, design, and construction process.

The acronym PEPC stands for Planning, Environment and Public Comment. Consider how PEPC can address these important issues.

PEPC assists with national park **planning** activities by:

- Improving the overall tracking and management of projects
- Helping interdisciplinary team members collaborate on projects
- Tracking key milestones of projects
- Making information available to all NPS staff
- Increasing communication among project participants, both inside and outside the NPS

PEPC assists with protecting the **environment** of national parks by:

- Increasing the efficiency of the compliance process
- Helping NPS employees prepare Environmental Screening and Assessment of Effect forms
- Simplifying the scheduling of site visits as well as the tracking of tasks and mitigations
- Tracking environmental consultations
- Helping everyone involved in the process to make better decisions

PEPC assists with **public comment** to the National Park Service by:

- Fostering better relationships with constituents
- Allowing NPS employees to communicate plans, meetings, and the status of projects via the Internet
- Helping the NPS collect, analyze, and respond to public comment
- Making information available to the public in a single, easily-accessible location

In this chapter you will learn about why PEPC was developed.

**Objectives**

- Explain the need for the PEPC system
- Discuss Director's Order 12 and PEPC

## The Need for PEPC

PEPC was created in response to a variety of issues throughout the NPS. The main area of concern related to the perception that NEPA/NHPA compliance requirements impeded the completion of projects. This view of compliance as an obstacle stemmed from a pattern of parks funding, designing, and preparing to implement NPS projects before compliance work was even initiated.



Often, NPS employees were unclear about what level of compliance, if any, was required for projects at their parks. Separate divisions in the same park would frequently duplicate effort by working individually both to request funding for projects and to plan for project implementation. Also, because compliance files often existed only in hard copy, they were not always readily available or consistently maintained in the past. The routing of these hard copy documents to various specialists to accomplish interdisciplinary reviews was extremely time consuming and greatly extended the project schedule.

Furthermore, because individual park units had developed their own tracking systems, NEPA/NHPA compliance was difficult to observe or measure Servicewide. Washington, regional, and local park offices lacked a Servicewide computerized program that would allow them to monitor the status of compliance projects, identify parks involved in controversial issues, or track the number of projects in process at any given time. Prior to the development of PEPC, it was also not possible for managers to report on project status and trends across projects.

Finally, many people felt the NPS was losing credibility due to the difficulty in consistently responding to the large number of email comments it was receiving from the general public about proposed projects. Also, numerous parks were unable to handle the volume of comments on high profile compliance actions because they did not have a computerized tool to assist them in coding, analyzing, summarizing, or responding to these comments. The lack of a central place for members of the public to get information about NPS plans was also of concern.

### **Learn More: The Mount Pisgah Project**

Without a system like PEPC, in the past parks often faced serious problems when compliance was not completed or was completed incorrectly. Consider the case of a Mount Pisgah project at Blue Ridge Parkway. The Mount Pisgah Utilities Rehabilitation project was designed to address serious issues associated with the water distribution and sewage collection systems of an area encompassing 622 acres and serving 250,000 visitors annually. The Mt. Pisgah Utilities Rehabilitation project was funded in fiscal year 1999 through the repair/rehab program prior to NEPA/NHPA being initiated.

The level and complexity of the compliance for this project required an Environmental Assessment and three years of threatened and endangered (T&E) species monitoring that was not built into the funding request. This caused the overall project to be delayed while construction funding was not obligated. Therefore, the water and sewer lines could not be repaired and park resources and visitor services were still at risk due to potential line failures. A local environmental group threatened a lawsuit against the park for not following the NEPA/NHPA process and not publicly disclosing project activities.

Up to this point, the park did not have a process to address resource planning and compliance requirements consistently. Today, NPS employees can eliminate the frustrations of project delays and lawsuit threats by using PEPC to follow a logical process of managing the project and complying with NEPA and NHPA.

Overall, when it came to NEPA/NHPA compliance for NPS projects, people realized:

- The compliance process was not being integrated with project management and conservation planning.
- Compliance was often compromised or not completed due to inadequate planning for compliance funds.
- Park resources were being jeopardized due to the lack of project review and poor communication among project leaders, resource managers, compliance specialists, and program managers.