From:	Bowman, Randal
To:	Barnett, Teri
Subject:	Considerations on public comments
Date:	Wednesday, May 17, 2017 5:01:45 PM
Attachments:	Considerations for National Monument Review Public Comments.docx

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I had several other things waiting for me when I got back or would have had this sooner, but here is a statement on the 3 factors as discussed in the last meeting. Please let me know if I need to add anything or revise any of the sections to meet your needs.

Considerations for National Monument Review Public Comments

Confidentiality – all comments except those from Members of Congress and Governors will be posted on the FDMS aspect of the Regulations.gov site, either directly from comments filed through Regulations.Gov, or through scanning and uploading of mail comments by Departmental staff. All of those comments are made publicly available by the site.

Neither the comments nor the sorting of the comments into categories that we expect to be done for us through the DiscoverText contract have any expectation of nor need for confidentiality. We seek to have the system sort the comments into those general in nature, such as opposing any changes to the current monuments overall, or falling into specific categories such as commenting on grazing, public access, or wilderness at specific monuments. We have been advised by the Solicitors that (b) (6) [redacted].

No contractor staff nor anyone outside of the Department would have access to the reports we prepare for the Secretary based on the public comments, at least until after they are submitted, as those will be done within the Department solely by Departmental employees and not drafted or posted on either the contractor site or Regulations.gov. Whether those would be releasable under FOIA is not clear at this point, but there should be nothing in the reports that would be confidential or embarrassing if released.

Integrity - this is not a particular concern in this case because all comments would be available on both the Regulations.gov site and the DiscoverText site. If there were any questions on possible alterations we could easily compare against the comment on the other site. It is also unlikely that any one particular comment would have a noticeable impact on the analysis of the overall comments for any monument.

Availability – as with "Integrity", that is not of particular concern in this case for the reasons noted in that section Even if both the sites went down for several days, the fact that we are proposing to acquire 20 licenses from the contractor would give us the option to utilize higher level employees to make up for lost time in meeting any particular deadline. An example would be that if the Secretary wanted a report on a particular monument in the near future after such a joint loss of access, we would have higher-level experts each review one category of comments on that monument and write their report on that category immediately thereafter, rather than first having lower-level employees review and summarize all such comments, and then having reports prepared by higher-level personnel from the summaries.