

CASE STUDY

Public Comment Management: Heated Opposition, Major Politics, Strict Timelines and Billions of Dollars at Stake

How HaystackID™ Helped a Global Environmental Practice Process
and Deliver Public Comments in Record Time and Under Budget

By Albert Barsocchini, JD, LLM, CEDS

HAYSTACK™



The Challenge

HaystackID was tasked with managing all public comments from a highly controversial open-pit mining development along with an associated transportation corridor in Alaska. The proposed project triggered the need for an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA).

HaystackID Responds

At the outset, the HaystackID review team went through substantive training on the purpose of the review, what is and what is not a substantive comment, coding choices, and related considerations. HaystackID created detailed project binders with hard copies of these materials so the reviewers could reference them throughout the review process.

HaystackID was asked to collect, filter, categorize, host in Relativity and produce in a specified format hundreds of thousands of unique public comments from multiple formats including web-forms, emails and attachments, Word, PDF, regular mail (handwritten and typed), comment cards, and public transcripts.

The Solution

The review workflow required a 1st pass comment run to limit the number of comments by flagging the non-substantive comments and organizing substantive comments into broader categories so the environmental experts could efficiently review only those comments in their category. Each submission was tagged and parsed by multiple environmental categories including demographic information for statistical and descriptive analysis. Additionally, submissions needed to be tagged for security threats for daily threat reporting to the company preparing the Environmental Impact Statement (EIS).

Throughout the review process, two platforms were used. Relativity was used to identify and tag documents belonging to form letter campaigns. A technology called SmartComment was also used to analyze non-form letters, a representative member of each form letter group, and form letters with unique content.

Once all documents were ingested into Relativity, the analytics team ran structural analytics over the corpus for textual near-duplicate identification. Where possible, documents were placed into textual near-duplicate groups by Relativity based on their similarity score. These groups were then analyzed to determine if they represented a form letter, and, if so, the form letter was given a name or number for identification purposes.

The analysis of potential form letters included using file size and/or textual near-duplicate similarity scores to identify documents that needed review by reviewers for unique [substantive] comments.

Documents that were not included in one of these textual near-duplicate groups (after undergoing textual near-duplicate analysis by Relativity's analytics functionality) were ingested into SmartComment and underwent first-pass review.

The project team maintained review metrics to report on the progress of the review. After the review, HaystackID provided a working report including the documents reviewed, form letter count, issue tag count, and other required information.

The team performed data validation using the unique ID and submission ID given to each comment to run a comparison of the comments on the project website and those in Relativity. The comparison ran once during the comment period, and again at the end of the comment period. By matching up these IDs, it was confirmed all comments received were transferred/ingested into the Relativity environment.

The Outcome

The team processed over 300,000 submissions and finished the project in record time saving almost a year's worth of work. Our public comment management service accelerated and improved the public comment response time for environmental impact projects and saved a significant amount of money as well.

About Public Comment Management

HaystackID's public comment management service accelerates and improves the public comment response time for environmental impact projects, rule changes, permit applications, and for agencies and organizations that need professional comprehensive support on both large and small projects.

Using a combination of experienced in-house legal review teams and the latest processing, analytics and hosting technologies, we can rapidly process emails, letters, public hearing transcripts, hand-written comment cards, and social media comments.

HaystackID's innovative process and best-of-breed technology ensures transparency and accessibility for citizens and provides agencies with a fast, accurate, effective, and efficient method for responding to public comments.

Our powerful suite of technology organizes comments by name, date, topic and sub-topic, location, and other required criteria based on the specific project. This allows project teams to efficiently and accurately respond to meet critical deadlines.

HaystackID, a leader in the industry, has years of experience developing proven workflows, quality control systems, metrics, efficiency standards, and reporting capabilities—factors critical for public comment management.





About the Author

Albert Barsocchini is the Strategic Global Advisory Consultant at HaystackID. Albert has over 20 years of experience and proven leadership in litigation support, information governance, digital investigations, and privacy by design. He is an acknowledged expert in the intersection of law and technology.

About HaystackID

HaystackID is a specialized eDiscovery services firm that helps corporations and law firms find, understand, and learn from data when facing complex, data-intensive investigations and litigation. HaystackID mobilizes industry-leading computer forensics, eDiscovery, and attorney document review experts to serve more than 500 of the world's leading corporations and law firms from North America and Europe. Serving nearly half of the Fortune 100, HaystackID is an alternative legal services provider that combines expertise and technical excellence with a culture of white glove customer service. For more information about its suite of services, go to HaystackID.com.