



U.S. Department of Transportation
Federal Highway Administration

Examples

of Effective Techniques for
Preparing High-Quality
NEPA Documents

Introduction

For more than a decade, the Federal Highway Administration (FHWA) has been engaged in an effort to improve the quality of environmental documents prepared under the National Environmental Policy Act (NEPA). This effort has included several initiatives undertaken in collaboration with the American Association of State Highway and Transportation Officials (AASHTO) and the American Council of Engineering Companies (ACEC).

In 2006, this collaborative effort resulted in the publication of a joint report, *Improving the Quality of Environmental Documents*, which identified three core principles that should guide the preparation of high-quality NEPA documents:

- **Tell the Story:** Tell the story of the project so that the reader can easily understand the purpose and need for the project, how each alternative would meet the project goals, and the strengths and weaknesses associated with each alternative.
- **Keep it Brief:** Keep the document as brief as possible, using clear, concise writing; an easy-to-use format; effective graphics and visual elements; and discussion of issues and impacts in proportion to their significance.
- **Meet Legal Requirements:** Ensure that the document meets all legal requirements in a way that is easy to follow for regulators and technical reviewers.

Since 2006, many State departments of transportation have embraced reader-friendly approaches to NEPA documents. In addition, FHWA has actively encouraged efforts to improve NEPA document quality as part of the Every Day Counts initiative. This broad commitment has resulted in a growing body of examples of completed NEPA documents that embody reader-friendly principles. But in practice, it can be difficult for practitioners to find relevant examples of the various techniques that have emerged across the country.

The purpose of this report is to help practitioners bridge the gap between the theory and practice of producing high-quality NEPA documents by providing examples that illustrate specific techniques. The examples are organized into two broad categories:

- **Improving Overall Document Quality.** This group includes techniques for improving the quality and readability of the NEPA document as a whole. These examples address such issues such as page layout, writing style, and graphics.
- **Meeting NEPA and Related Requirements.** This group includes techniques for strengthening portions of the document that address specific requirements under NEPA and other environmental laws. These examples address issues such as purpose and need, alternatives analysis, methodologies, and mitigation.

For a full list of the techniques covered in this report, refer to the Table of Contents below.

Background

How is this report organized?

This report consists of 17 chapters, each addressing a technique for improving the quality NEPA documents. Each chapter begins with a brief introduction, which provides context and describes the technique. Following the introduction, the chapter includes a series of examples. Each example is an excerpt from a recent EIS. The examples are annotated to describe the techniques that they are intended to illustrate.

How was this report was developed?

The examples in this report were gathered based on input received from State departments of transportation and consultants, as well as independent research. The examples in this report were selected because they illustrate a range of potential methods for improving the quality and readability of NEPA documents. For a list of the NEPA documents used in developing this report, refer to the Reference Documents section below.

How is “document quality” defined?

For purposes of this report, “quality” is defined broadly to include both readability and legal sufficiency. Therefore, this report does not focus solely on ways to make NEPA documents more “reader-friendly.” Some of the techniques primarily enhance readability, while others primarily enhance legal sufficiency and defensibility.

Does this report create any new requirements? Is it official guidance?

No. The goal of this report is to serve as a source of ideas about ways to improve NEPA documents. The report does not create requirements, nor does it provide official guidance.

What other materials are available to assist in improving NEPA document quality?

The 2006 report, *Improving the Quality of Environmental Documents*, provides an excellent overview of approaches to improving NEPA document quality. In addition, several States have developed their own guidance documents, as listed in Resource Materials below.

In addition, a Practitioner’s Handbook on Improving NEPA Document Quality is in development by the Center for Environmental Excellence by AASHTO. The Practitioner’s Handbook will synthesize and expand upon the techniques shown in this report.

Where can copies of this report be obtained?

Copies of this report are available for download, without charge, on the website of the Center for Environmental Excellence by AASHTO at www.environment.transportation.org.

Table of Contents

A. Techniques for Improving Overall Document Quality

Chapter 1. Page Layout

- White Space, Use of Color
- Integration of Text and Colors

Chapter 2. Writing Style

- Clear, Succinct Language
- Use of Bullets to Summarize key Points
- Technical Terms Prominently Displayed

Chapter 3. Document Structure

- Combine Affected Environment and Environmental Consequences Chapters
- Separate Chapters (Not in Standard EIS Template)

Chapter 4. Navigation

- How to Use This Document
- Roadmaps to EIS and Chapters
- Table of Contents at the Beginning of Each Chapter
- Header/Footer with Chapter, Section, and Subsection
- Table of Contents Describes Contents of DVD

Chapter 5. Abstracts

- Preface, Fact Sheet, or Abstract
- Summary at Beginning of Each Chapter or Major Section

Chapter 6. Presentation of Data

- Data Presented in Figures
- Use of Colors to Highlight Important Data in Tables
- Bar Charts (Instead of Tables) Used to Present Data
- Tables—Citations to Data Sources

Chapter 7. Figures

- Important Features Clearly Labeled
- Major Elements Stand Out Clearly Against Background
- Legend Is Clear and Complete

Chapter 8. Visualization

- Computer-Generated Renderings
- Photo Simulations and Artist's Drawings
- Cross-Sections with Artwork

Chapter 9. Appendices

- Cross-References to Technical Reports in Main Volume of EIS
- Detailed List of Appendices in the Table of Contents
- Key Appendices Included in Paper Copy of NEPA Document

Chapter 10. References to Supporting Materials

- References List Is Organized by Chapter of the EIS
- References Listed in Each Chapter

B. Techniques for Demonstrating Compliance with NEPA and Related Requirements

Chapter 11. Purpose and Need

- Plain Language Used to Describe Purposes and Needs
- Bullets Used to Summarize Purposes and Needs
- Needs Supported by Data and Visuals
- Documentation of Public and Agency Role in Developing P&N

Chapter 12. Alternatives Analysis

- Screening Discussion Condensed; Moved to End of Chapter
- Screening Criteria and Steps Are Clearly Explained
- Elements of Each Alternative Are Clearly Described
- Refinements to Alternatives Are Summarized
- Side-by-Side Figures Used to Compare Alternatives
- Documentation of Public and Agency Role in Developing Alts

Chapter 13. Methodologies

- Methodologies Briefly Explained
- Unusual/Complex Methodology Issues Are Explained
- Changes in Methodology Are Summarized
- Cross-Cutting Issues Are Explained Early in Effects Chapter

Chapter 14. Mitigation/Commitments

- Separate Section or Chapter Lists Commitments
- Commitments Are Clearly and Consistently Defined
- Process for Monitoring Implementation Is Described

Chapter 15. Regulatory Compliance

- Regulatory Setting Is Briefly Summarized
- Consultation Process Is Documented, with Key Dates Specified
- Relevant Factors Listed and Considered
- Required Findings Made, with Correct Wording
- Supporting Documents Included in Appendix and Referenced

Chapter 16. Responses to Comments on DEIS

- Agency Comments Are Summarized in Main Body of FEIS
- FEIS Includes Index of All Commenters on DEIS
- Responses to Frequent Comments on DEIS Are Summarized
- Responses Include Specific Cross-References to Relevant Sections of the FEIS and Appendices
- Comment Letters Annotated to Identify Specific Comments

Chapter 17. Changes During the NEPA Process

- Each Chapter of FEIS Begins with a Brief Summary of Changes to That Chapter Since the DEIS
- Post-DEIS Agency Coordination Is Summarized
- Post-DEIS Refinements to Alternatives Are Described
- New Information Is Acknowledged and Explained
- Summarize Findings of Reevaluation