



Back to the Basics: Improving the Quality of Environmental Documentation

Environmental documentation written to comply with the National Environmental Policy Act (NEPA) plays an important role in communicating the environmental impacts of agencies' decisions to the public and decisionmakers. However, producing documentation like Environmental Impact Statements (EISs), Environmental Assessments (EAs), and Categorical Exclusions can be time-intensive and can be a source of project delay when documentation does not clearly communicate the story of a project to stakeholders and the public.

The Federal Highway Administration (FHWA) Office of Project Development and Environmental Review (HEPE), the FHWA Resource Center (RC), the American Association of State Highway and Transportation Officials (AASHTO), and the American Council of Engineering Companies (ACEC), aim to help transportation practitioners in implementing quality environmental documentation (IQED). With this goal in mind, HEPE, the RC, AASHTO, and ACEC launched a number of efforts to help State and local transportation agencies produce quality environmental documentation, which can save time during the project review process.

This issue of Successes in Stewardship points practitioners toward best practices in IQED, which can help to balance regulatory compliance with clear writing and effective presentation of information. This issue also provides information about background on IQED efforts, ongoing IQED initiatives, and links to examples and resources.

Look What's New!

The FHWA Office of Project Development and Environmental Review posted information on [NEPA Assignment on the Environmental Review Toolkit](#). This information covers [Program Assignment \(23 USC 327\)](#) and [Categorical Exclusion Assignment \(23 USC 326\)](#).

Why Focus on IQED?

Quality environmental documentation is concise, written to be easily read and understood, and meets the requirements of laws and regulations—in other words it is legally sufficient. One benefit of developing clear, understandable documentation is that it demonstrates accountability and builds trust through engaging the public, decisionmakers, and regulatory agencies in a meaningful dialogue about projects. It also records agency decisionmaking and can reduce the need for potential legal recourse.

In 2003, FHWA, AASHTO, and ACEC formed an initiative to improve the readability and functionality of the documentation prepared for transportation projects in compliance with NEPA. The initiative outlined three guiding principles for producing quality environmental documentation in the 2006 report [Improving the Quality of Environmental Documents](#). These principles focus on telling the story of the project, maintaining brevity and using clear language, and producing documents that are legally sufficient.

[Guidance](#) on the importance of outlining agency decisionmaking in a way that is easily understandable to stakeholders and the public has existed for many decades. However, the 2006 report built on existing guidance, outlining both the need for clear and legally sufficient documentation and best practices for creating this documentation.

How Does FHWA Support IQED?

In 2009, FHWA launched the [Every Day Counts \(EDC\) initiative](#) in partnership with AASHTO to speed up delivery of highway projects and address the challenges presented by limited budgets. Through EDC, FHWA works with State and local transportation agencies and industry stakeholders to identify a new collection of innovations to champion every two years. Throughout the two-year deployment cycle, specifications, best practices, lessons learned, and relevant data are shared among stakeholders through case studies, webinars, and demonstration projects. The result is rapid technology transfer and accelerated deployment of innovation across the nation.

What Is Quality Environmental Documentation?

Quality environmental documentation follows three core principles:

- Principle 1: 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.
- Principle 2: Keep the documentation 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.
- Principle 3: Ensure that the documentation meets all legal requirements in a way that is easy to follow for regulators and technical reviewers.

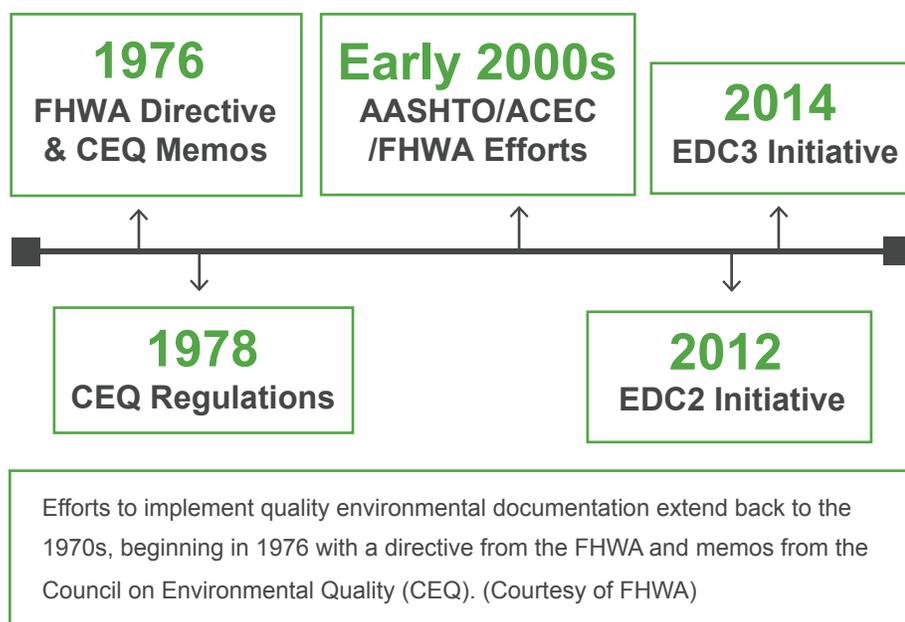
EDC-2 (2013-2014)

EDC-2, the second year-long round of EDC, [introduced IQED](#) through promoting best practices for simplifying and expediting the development of environmental documentation. It focused on ensuring that the efforts for project purpose and need, consideration of alternatives, and impacts were appropriately documented and effectively included in NEPA documentation. The effort was designed to make NEPA documentation more effective in disclosing the information used in making project decisions to the public and participating agencies. In 2014, FHWA published [Guidance on Making a Quality EIS Summary](#) that provides a question-and-answer format to use when writing a quality EIS summary.

EDC-3 (2015-2016)

EDC-3 expanded on IQED efforts introduced by EDC-2 by [improving collaborative processes](#). EDC-3 supported tools to foster collaborative, timely, and transparent interagency reviews, which can cut the amount of work and resources required, save time and money, and improve the quality of NEPA documentation for projects. Efforts included creating systems to facilitate document-sharing and collaboration between two or more agencies.

HOW DID WE GET HERE?



What Are the 3 Basic NEPA Classes of Action?

Transportation projects vary in type, size, complexity, and potential to affect the environment. Transportation project effects can vary from minor to significant impacts on the human environment. To account for the variability of project impacts, three basic “classes of action” are allowed and determine how compliance with NEPA is carried out and documented:

- An [Environmental Impact Statement \(EIS\)](#) is prepared for projects where it is known that the action will have a significant effect on the environment.
- An [Environmental Assessment \(EA\)](#) is prepared for actions in which the significance of the environmental impact is not clearly established. Should environmental analysis and interagency review during the EA process find a project to have no significant impacts on the quality of the environment, a [Finding of No Significant Impact \(FONSI\)](#) is issued.
- [Categorical Exclusions \(CEs\)](#) are issued for actions that do not individually or cumulatively have a significant effect on the environment.

What IQED Trainings, Technical Assistance, and Resources Are Available?

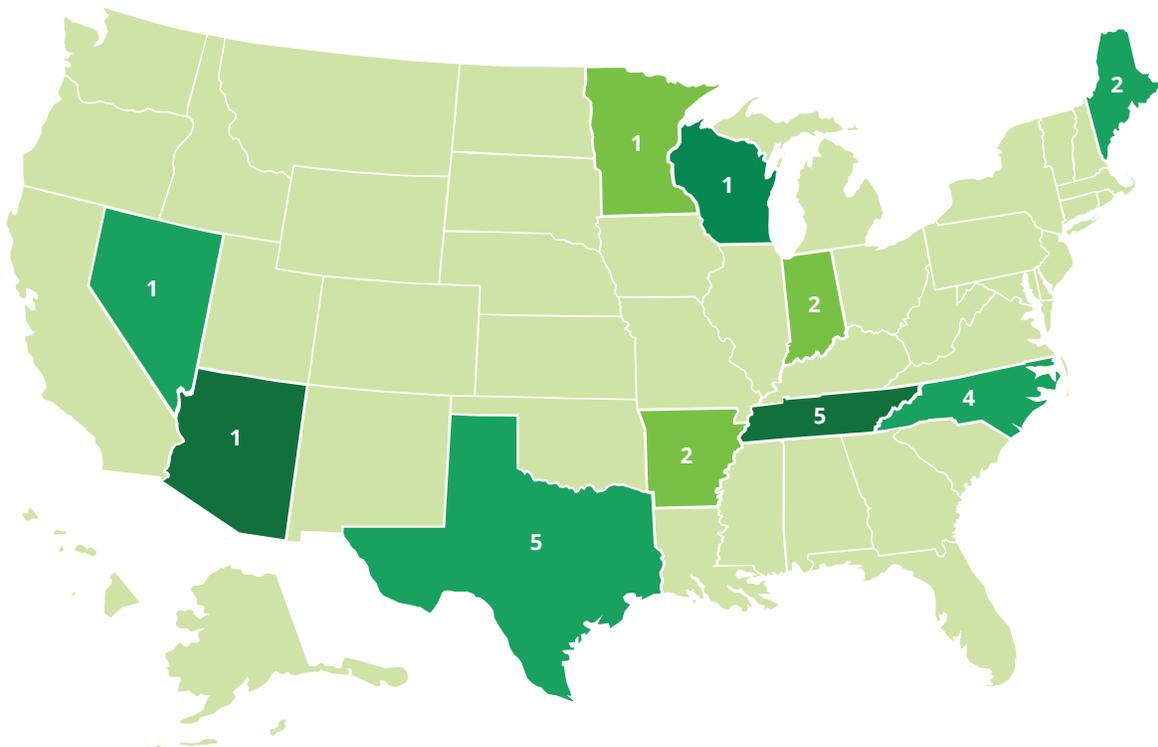
IQED Workshops

FHWA offers training and technical assistance to States interested in applying IQED strategies. Topics for these one or two day workshops range from a broad overview of IQED to more specialized topics tailored to meet an office’s needs. For example, recent workshops have focused on how to develop purpose and need statements and how to develop and evaluate alternatives. To schedule a workshop, contact Rob Ayers, Environmental Program Specialist, at Rob.Ayers@dot.gov.

Trainings and Technical Assistance

IQED techniques are included in the National Highway Institute (NHI) course [NEPA and the Transportation Decisionmaking Process](#), which presents the historical background and evolution of NEPA and related environmental laws. FHWA is currently working to integrate IQED techniques into other trainings. To attend a course, visit the [NHI website](#) for details on available session dates and locations.

Number of IQED Workshops



Several States have participated in IQED workshops offered by FHWA. (Courtesy of FHWA)

Additional Resources

To learn more about practices for improving the quality of environmental documents, see the following resources.

- [Guidance on Making a Quality EIS Summary](#)

This guidance and question-and-answer template provides a tool for practitioners to use to increase the clarity in communicating issues and conclusions in an EIS, reduce paperwork, and accelerate project delivery.

- [Handbook on Preparing High-Quality NEPA Documents for Transportation Projects](#)

This handbook describes best practices for improving the quality of environmental documents prepared for transportation projects under NEPA.

- [AASHTO Practitioner's Handbook Defining the Purpose and Need and Determining the Range of Alternatives for Transportation Projects](#)

This handbook provides recommendations for defining the purpose and need and determining the range of alternatives in EISs and EAs for transportation projects, in accordance with NEPA.

- [Improving the Quality of Environmental Documents](#)

This report documents an initiative of transportation practitioners nationwide to improve the quality of environmental documentation.

- [AASHTO Examples of Effective Techniques for Improving the Quality of Environmental Documents](#)

This report describes 17 techniques to improve the quality of NEPA documents, with examples from recent EISs. These can be used to produce documentation that tells the story of the project, is clear and understandable to its readers, and legally sufficient.

- [Federal Plain Language Guidelines](#)

This document provides advice on clear communication and helps improve writing, so readers can find what they need, understand what they find, and use what they find to meet their needs.

What Is Next for IQED at FHWA?

Improving the quality of environmental documentation continues to be an area of focus for HEPE and the RC. Through these new and existing efforts, HEPE and the RC will continue to provide support and expertise on IQED to State and local transportation practitioners in the field. For updates on IQED and related project development and environmental review strategies, resources, and guidance, visit the [Environmental Review Toolkit](#).

Successes in Stewardship is a Federal Highway Administration newsletter highlighting current environmental streamlining and stewardship practices from around the country. [Click here](#) to subscribe, or call (617) 494-3719 for more information.

CONTACT

Owen Lindauer
Environmental Protection
Specialist
Office of Project Development
and Environmental Review
Federal Highway
Administration
Owen.Lindauer@dot.gov
202-366-3655