Every Day Counts — innovation · ingenuity · imagination · invention

IMPLEMENTING QUALITY ENVIRONMENTAL DOCUMENTATION

Environmental documentation can delay project development when stakeholders find National Environmental Policy Act (NEPA) documents difficult to comprehend, unnecessarily lengthy, do not meet legal requirements or omit important information. Existing recommendations and recent experience will be used to address the minimally necessary and sufficient material that comprises the NEPA document, the documentation that supports (but need not be included in) the decision, and the materials to retain for an administrative record to demonstrate project decisions were not arbitrary and capricious.

This Every Day Counts (EDC) program seeks to implement existing recommendations and recent experience to improve the quality and, at the same time, reduce the size of NEPA documents. The initiative improves the quality of NEPA documents by making them more effective in disclosing the information for making project decisions to the public and participating agencies, including regulatory agencies who have permitting or review responsibilities.

By improving NEPA documents, project proponents will accelerate project delivery and achieve better environmental outcomes. The program will promote recent best practice experience and build upon prior efforts, including recommendations from the May 2006 report *Improving the Quality of Environmental Documents – A Report of the Joint AASHTO/ACEC Committee in Cooperation with the Federal Highway Administration.*

BENEFITS

Producing quality environmental documentation and reducing NEPA document size will increase efficiency and effectiveness by:
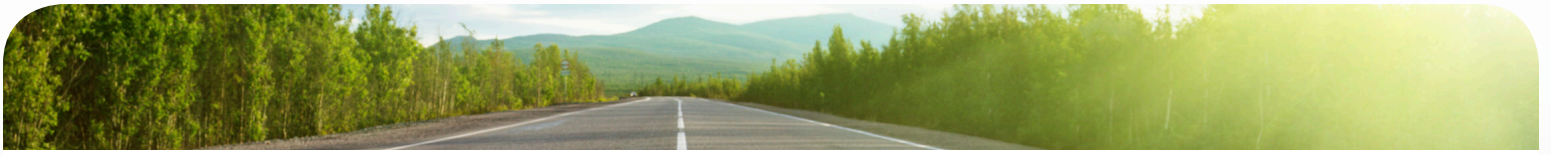
▸ Reducing the amount of work and resources required to produce such documentation

▸ Saving considerable time and money while improving the quality of NEPA documents

▸ Refocusing efforts on "counting what counts" and "telling the story"

▸ Increasing efficiency while maintaining appropriate consideration for the environment

CURRENT STATE OF THE PRACTICE

This EDC program to implement quality environmental documentation will promote existing recommendations and current best practices to simplify and expedite the development of environmental documents, saving time and money. It will focus on ensuring that the good efforts for project purpose and need and consideration of alternatives and impacts are appropriately documented and effectively included in the NEPA document.

Best practices in developing and documenting purpose and need, alternatives analysis and impacts make clear presentations in plain language using effective visual elements. Document writers focus on information that is relevant to the project decision, keeping the document as brief as possible. The purpose and need should be specific and provide an understandable conceptual framework for the NEPA analysis. This supports the screening process in selecting the reasonable alternatives for further evaluation of their cost and impacts. The purpose and need should be the credible basis for the decision recorded in a Record of Decision or a Finding of No Significant Impact.

Existing recommendations promote right-sizing documents to maintain brevity and readability. This includes:

▸ Using clear, concise writing

▸ Preparing effective summaries, technical reports and other documentation but including them in the project file

▸ Choosing a flexible, easy-to-use document format

▸ Summarizing information and using pictures and effective graphics to communicate complex issues or comparisons

▸ Separating technical information or high-volume materials into appendices or incorporating by reference

▸ Including only the most relevant information in the document for compliance and decision making

▸ Making the level of detail on a topic related to its relative importance and degree of harm to the project

▸ Incorporating by reference when possible and appropriate (rather than including in the body of the NEPA document)

SUPPORT AND AVAILABLE TOOLS

A wide range of tools are available to assist Division Office and State departments of transportation in the creation, expansion or revision of programmatic approaches including:

▸ Federal Highway Administration (FHWA) Streamlining Website, Purpose and Need, *http://environment.fhwa.dot.gov/projdev/ tdmneed.asp*

▸ FHWA Streamlining Website, Alternatives, *http://environment.fhwa.dot.gov/projdev/ tdmalts.asp*

▸ FHWA Streamlining Website, Documentation, *http://environment.fhwa.dot.gov/projdev/ pd4document.asp*

▸ American Association of State Highway and Transportation Officials (AASHTO) Handbook on Maintaining a Project File, *http://environment.transportation.org/pdf/ programs/PG01.pdf*

▸ AASHTO Handbook on Purpose and Need, Alternatives, *http://environment.transportation.org/pdf/ programs/PG07.pdf*

▸ The 2006 joint AASHTO/American Council of Engineering Companies/FHWA document, *Improving the Quality of Environmental Documents, http://environment.transportation.org/pdf/nepa_ process/QUALITY_NEPA_DOCS.pdf*

U.S. Department of Transportation
Federal Highway Administration