

## Executive Summary: Improving Environmental Documents - Comment Form Analysis

For more detail please reference the full report: Improving Environmental Documents

### **Purpose**

We conducted this study to determine the common comments made by FHWA and WSDOT reviewers on NEPA environmental documentation. Information about these comments can help the project teams better understand what reviewers are looking for in current projects, improve the quality of environmental documents and speed up project delivery. Results of the analysis were used to create tips for document writers and reviewers.

### **Methods**

Comment forms were requested from WSDOT regions, modes, Highways and Local Programs, and FHWA staff. Comment forms more than 10 years old and improperly filled out Comment Review and Rating Form were excluded from the analysis. Approximately 150 comment forms were submitted which resulted in 5333 comments from 20 projects. Comments were categorized to identify patterns and trends.

### **Results**

Results of the comment analysis are described in three categories: general, EA/EIS, and discipline-related. Information in the general category applies to all environmental document authors and reviewers. The discipline-related provides general discipline and discipline-specific information. Each section contains suggestions for ways authors and reviewers can improve their documents (see appendix).

#### General

**Document inconsistencies:** The analysis revealed two major types of contradictory content: Document inconsistent (references, organization, use of terms), and inconsistent document content (conflicting conclusions, level of detail). To increase the consistency of general project information in environmental documents, we recommend creating a style guide for an author's packet.

**Editorial:** Editorial comments include all of the basic writing and presentation elements of the text, ranging from simple spelling errors and word use issues to layout and writing style. Over 29% of all comments fell into the editorial category. A technical editor should review documents before they are sent to WSDOT and FHWA for review.

**Writing style:** Comments on writing style tended to focus on the need to improve the clarity of the text and consistency within the document.

**Graphics:** The graphics in environmental documents were found to have problems in two areas: readability and content. To improve readability and quality of graphics, we recommend the development of standard graphic templates for inclusion in the author's packet.

### EA/EIS Related Comments

These comments were submitted on formal environmental documents such as EA or EIS's. The comments are split into six general categories: project description, impacts, conclusions, project alternative/option, process, and content. Issues in each category include, but are not limited to: missing, incorrect or misleading information, inconsistent level of detail throughout, or conclusions are not adequately supported. Please see the following table for comments and recommendations for authors and reviewers on EA/EIS's.

### Discipline Specific Comments

Please see the following table for comments and recommendations for authors and reviewers on disciplines with the most common recorded comments.

### **Conclusion and Recommendations**

This analysis revealed several areas where environmental documents can be improved and some common errors can easily be avoided or remedied. Document writers can improve document quality by:

- Establishing a naming convention.
- Standardizing project information in an author's packet.
- Creating standards for graphics.
- Cross-checking section information to ensure it is consistent and accurate.
- Include the most current data available and describe methodologies
- Support conclusions.

Editing documents for format, grammar, spelling, and organization prior to review will enable reviewers to focus on technical content. Non-technical documents should be written in the plain talk/reader-friendly format but use discipline-specific standard language and define technical terms that the reader may not be familiar with. Use terms consistently throughout the document. Most importantly, the information should be presented in a way that is useful to the reader and the public.

Each discipline has specific information they need to provide in their sections. It is important that writers provide the appropriate level of detail for projects and disciplines (right-sized). Discipline specific recommendations are summarized in the table below.

Document reviewers should focus efforts on substantive content and not editorial or stylistic content unless specifically requested to do so by the project team. Comments need to be specific, concise and clearly describe what is required. Reviewers should follow the comment form instructions on comment priority ranking. Generally, things like inconsistent information and mismatched information that may lead the reader to misinterpret findings should be given a 1 or 2 priority rating. Conflicting conclusions should always be rated as a priority 1 concern. Most editorial comments should be given a low priority rating. The reviewer should also ensure that the impacts are completely described (size, location, etc.), that all level of impacts are discussed, that conclusions are supported and that the appropriate processes have been followed and documented.

A little effort in these areas can improve the quality of our environmental documents, streamline the review process and provide the public and decision makers with more useful information.