Team Collaboration in NEPA

The framers of the National Environmental Policy Act (NEPA) appear to have believed that team collaboration would be necessary for a NEPA analysis. Witness that Section 102(2)A of NEPA mandates that NEPA practitioners use an "interdisciplinary approach."

Views differ as to what is a clear and defensible interdisciplinary approach. The best current answer is that a team of preparers collaborate on both the NEPA analysis and the documents recording the analysis. A team is desirable because NEPA analyses routinely require experts from several resource disciplines. Even a routine, concise Environmental Assessment (EA) often has information from a dozen or more resource specialists.

The framers wisely realized in the late 1960s that an adequate NEPA analysis would be too complex for a single specialist, either to conduct or to record clearly in disclosure documents. Hence their mandate for an "interdisciplinary approach"!

Why do NEPA projects require team collaboration? NEPA analyses have overlapping topics even for simple projects. Consider a project that affects the temperature of water in a stream. The changed temperature might adversely restrict fish reproduction. If reproduction crashes, fishermen will cease to visit the stream. Local quick stops might lose business. Documents recording this project would require the following separate but linked text:

- Impact projections begin with a water quality analysis.
- Next come impacts on fish reproduction.
- Then comes a profile of the decreased level of recreational fishing.
- Finally, there is an analysis of the local economy and impacts on incomes for bait shops.

In this simple project, the Environmental Assessment would have four overlapping discussions, likely written by four or more specialists. No wonder NEPA documents suffer from inconsistencies even with well-managed collaborative teams.

NEPA practitioners today should initiate analyses with the recognition that team collaboration will be essential. The following listed suggestions deal with strategies for making teams as efficient as possible. Efficiency is a critical goal because poor team collaboration can add weeks or months to a project schedule. No wonder agency NEPA teams often face questions about their failure to meet NEPA deadlines and about out-of- control NEPA budgets!

Note that I am using "collaboration" in a limited sense. Team collaboration, as I am using the term, includes agency analysts and writers and, hopefully, their manager. My use of "collaboration" does not include an agency's required collaboration with external agencies and public interest groups, as defined under NEPA Scoping, in Section 1501.7 of the Council on Environmental Quality (CEQ) Regulations.

Suggestions for managing collaborative NEPA teams

1. **Identify key team members as early as possible and then hold early internal scoping meetings.**
2. **Accept both that some team members are not eager to be team members and that often you would prefer not to have these same folks as team members.**
3. **Invite team members to discuss collaboration goals and efficiency standards in the initial team meeting.**
4. **Make task assignments that include collaborative activities.**
5. **Begin and end meetings with feedback on the team's collaboration skills.**
6. **Conduct a final lessons-learned session and record both the team's successes and shortcomings.**
7. **Make the lessons-learned report available to other NEPA teams.**

1. Identify key team members as early as possible and then hold early internal scoping meetings

Key NEPA team members include the following:

- NEPA project leader
- Specialists with expertise on potential impact topics of relevance
- Writers, editors, and graphics specialists
- Manager or managers responsible for approving the NEPA project steps
- Legal counsels responsible for legal review of project steps

As soon as a Proposed Action is considered for possible analysis, each of these key team members should be identified and included in an agency's internal scoping meetings. All key contributors should attend internal scoping meetings, especially the manager.

Shipley consultants recommend that internal scoping address project initiation topics. Possible topics are listed in the Shipley outline for a Scoping Document/Project Initiation Letter. A copy of this outline is attached to this newsletter.

This Shipley outline is essentially an internal Statement of Work between relevant manager(s) and the NEPA team members. Key topics from this outline include the following:

- Preliminary Proposed Action and the attached Purpose and Need
- Scope of NEPA analysis (EIS vs. EA vs. Categorical Exclusion) and its rationale
- Known consultation and desirable public involvement
- Projected schedule and major deadlines
- Documentation standards (length, document/website design features, and written quality standards for both text and graphics)

- Team responsibilities
- Management approval (signed!)

As noted above, all major contributors should collaborate on decisions made during internal scoping meetings.

Note that this internal Scoping Document/Project Initiation Letter becomes a preliminary version of a formal Statement of Work if the project goes outside the agency for to a contractor to work on.

2. Accept both that some team members are not eager to be team members and that often you would prefer not to have these same folks as team members

Some potential team members may not want to join an upcoming NEPA project team. Their reasons are varied. The reality is that collaborative analyses require flexible collaborators, ones willing to compromise on project decisions large and small. Many well-trained specialists write good individual reports, but these same folks may find that adjusting their text to match the style and format of a complex document is frustrating.

Here is an example of poor collaboration. An uncooperative air quality specialist was working on a major EIS for the Bureau of Land Management. The specialist wrote a 100-page draft discussing air quality impacts for Chapter 4 in the EIS. But the air quality impacts discussion in the EIS was targeted to be no more than 15 or 20 pages of summary information. The specialist refused to compromise over the length of his draft and even attached a note stating that the team leader did not have permission to condense or edit the draft text.

The team leader eventually assigned another writer to summarize the air quality information for Chapter 4. Several weeks later a revision was finished. These weeks delayed the EIS schedule and increased the budget for the EIS. As might have been expected, the air quality specialist considered the new summary to be inadequate and even legally flawed.

Good collaboration presumes efficiency, and this efficiency often includes difficult compromises from all contributors!

Here is the case of unwilling or unproductive writers. The second point in suggestion 2 is that some possible team members are just unproductive writers. In the Shipley organization years ago, we had several consultants who turned out to be unwilling or unproductive writers. We eventually realized that they weren't willing (or perhaps able!) to write useful Shipley training materials. We subsequently found other ways to use them. One was an excellent salesman, so we sent him on marketing trips. He was highly successful, but other employees created marketing documents for him to use.

Agency managers (and NEPA project leaders) should assess available staff in terms of their ability to write adequate NEPA documents. In an ideal world all assigned team members would be productive and skillful writers! The reality is that a team is lucky to have a couple of skillful writers.

As an option, agencies have sometimes hired professional technical writers to "translate" inadequate text. I usually discourage this option for two reasons. First, additional personnel are an expensive addition to a project budget. Second, an agency's resource specialists should recognize that their professional success depends on skillfully written NEPA documents.

Most NEPA project leaders eventually realize that they are writing coaches for their team members. As coaches, they work to ensure that all submitted documents work together to be a credible and professional record of the team's NEPA analysis.

3. Invite team members to discuss collaboration goals and efficiency standards in the initial team meeting.

Make team collaboration a major goal. Perhaps the best way is to solicit from assigned team members their strategies for ensuring that the team functions efficiently.

Most teams will have some experienced NEPA practitioners. Ask them to tell the team what worked well on prior NEPA projects. Also, ask them for things to avoid. Finally, ask everyone (whether experienced or not) to contribute to this list of do's and don'ts. Circulate this list to all team members, and plan to revisit it in later team meetings.

A lot of analysis tasks require early and ongoing collaboration. The project schedule and its deadlines are a good illustration. Consider the situation when key contributors develop initial estimates of the time they need to analyze resource impacts. Everyone will have different estimates. Collaboration means that all specialists submit their estimates and then negotiations begin. Compromises are always part of such negotiations, and all contributors need to agree that compromises are necessary.

The purpose of such discussions and negotiations is to affirm that team collaboration is a major goal if the NEPA process is to be efficient.

4. Make task assignments that include collaborative activities.

Storyboards as a collaborative planning task. Storyboards are a visual planning strategy that helps specialists produce useful and consistent text and graphics. Most professional adults have done outlines for documents, but few have used storyboards.

Storyboards have become almost a Shipley trademark. Here are basic collaborative steps for preparing a storyboard:

- Count out blank pages to equal the estimated pages or screens in a website.
- Brainstorm numbered headings and subheadings on each page.
- Sketch in proposed graphics and jot down points to be emphasized in the graphics.
- Visualize the text, including estimated space for future paragraphs and any numbered or bulleted lists.
- Record questions, reminders, and project priorities, perhaps on post-its.

Early storyboards were always collaborative, with multiple contributors working on a whiteboard or on a flipchart pad. Current storyboards use computers, but they still rely on collaboration, with multiple contributors at different sites.

Each storyboard sheet is a visual template of the envisioned text and graphics that will be created in the days and weeks to come. Writers/specialists then work to fill in missing text and to refine the graphics. So writers using storyboards write text and lists to fill in identified features as recorded in the storyboard. Little revision is usually necessary. Thus the storyboard process is more efficient than the writing process used by traditional writers.

Contrast this storyboard approach with the process used by traditional writers. Writers often begin by writing page after page of dense ext. Next they need to rework this rough text, adding headings and subheadings, inserting newly created lists, and brainstorming graphics. Note that traditional writers routinely assumed a time-consuming revision process. Often the final document would be 20- or 30-percent shorter than the draft with its dense paragraphs. Such a revision process was a costly delay and clearly inefficient, especially in the case of multiple revisions.

For more information about storyboards visit the Shipley archive of newsletters at XXXXX (**Jeff?).** Newsletters 61 (November 2008) and 100 (October 2013) discuss storyboards.

Collaborative reviews of the evolving EA or EIS. Too many current teams do not collaborate on resource analyses, nor on the draft text recording impact conclusions. Members of teams argue that they are too busy analyzing their assigned resource to be familiar with another team member's work or with sections of draft text.

This isolation of team members ignores a major quality assurance opportunity. Every NEPA team member should be assigned quality assurance reviews as routine collaborative tasks. I usually recommend that every resource team member be expected to review draft impact conclusions from two or three other specialists. Their reviews should address several important questions:

- Do the impact conclusions clearly profile context and intensity forecasts?
- Are the conclusions clearly supported by listed reasons?

- Are cited studies and reports relevant to the impact conclusions presented?
- Are the impact conclusions in Chapter 3 or 4 consistent with the impact summary in Chapter 2?
- Are the text and associated graphics skillfully presented?

Shipley consultants recommend that reviewers use written quality standards. As an example of possible standards, see the Shipley Quality Writing checklist attached to this newsletter.

These reviews, if carefully done, should help every resource specialist become a more skillful writer. These reviews also help improve the legal credibility of the published NEPA documents.

5. Begin and end meetings with feedback on the team's collaboration skills.

Suggestion 5 returns to the theme of Suggestion 3: NEPA collaboration needs to be efficient!

The best way to emphasize this theme is to make it a standing agenda topic in every team meeting.

Open every meeting with several key questions:

- What do we want/need to accomplish in today's meeting?
- What tasks or topics do we need to address to have a successful meeting?
- How long should today's meeting be?

Then close the meeting with some equally important questions:

- Did we accomplish our stated purpose?
- How efficient was our meeting?
- Who was most effective in helping us meet our purpose?
- Did we chase some unnecessary rabbits?
- What would be suggestions for improving the efficiency of our next meeting?

Review of a meeting's successes (or failures) is a worthwhile topic. A lot of meetings are not worth the time invested in them. So here are some suggestions for conducting meetings:

1. Not every team member needs to attend every team meeting.
2. Consider having smaller groups meet with a focus on well defined subtasks; these groups can then report back to the other team members.
3. Invite attendees who have something specific to contribute, not just to fill seats.
4. Challenge any meeting that is mindlessly routine—for example, a weekly status meeting every Tuesday at 3 pm.
5. Have a published agenda, with assigned tasks for most attendees.

6. Conduct a final lessons-learned session and record both the team's successes and shortcomings.
7. Make the lessons-learned report available to other NEPA teams.

Suggestions 6 and 7 return to the task introduced in Suggestion 3. Suggestion 3 asked for assigned members to generate a list of efficiency do's and don'ts.

In my experience, experienced NEPA practitioners know major do's and don'ts about conducting a NEPA analysis. So Suggestion 6 suggests that a NEPA team conduct a lessons-learned review and prepare a short written report when they complete a NEPA assignment.

Then Suggestion 7 recommends making the report (from Suggestion 6) available to later NEPA teams. I am making this recommendation because I have only seen a few useful lessons-learned reports. Without such reports, each new NEPA project team is forced to set its own procedures and will perhaps make the same collaboration mistakes again and again.

Appendix A—Scoping Document/Project Initiation Letter

As early as possible, the IDT (interdisciplinary) leader and the team members should have a written scoping document in their hands to guide all subsequent team activities. This scoping document has various names: project initiation memo/letter, project plan, IDT contract, etc. Whatever its name, potential content includes the topics listed in the outline on the following pages.

Project Name _____

Project Number _____

Scoping Document/Project Initiation Letter

(Potential Content)

1. **Identify the proponent and the responsible official (if the two are different).**

2. **Summarize the proposal.**
   - *Who proposes to do **what**, **where**, and **when***
   - *Need for the action (**why**)*
   - *Objectives of the proposal (purpose). Objectives include project outputs and any known environmental resource objectives.*

3. **Specify the scope of the decision to be made.** *What actions and decisions are to be considered and which ones are excluded? As appropriate, reference higher-level planning procedures, such as forest plans or resource management plans.*

4. **Profile the scope of the environmental analysis.**
   - *Actions (connected, cumulative, similar) included in the analysis of all resources*
   - *Possible mitigation measures already anticipated to be necessary*
   - *Alternative actions, insofar as known*
   - *Anticipated environmental issues (projected resource impacts that will assist the decisionmaker and the public to choose between the alternatives)*
   - *Probable outside land holdings (federal, state, local, or private) of importance to a discussion of cumulative impacts*

5. Identify the anticipated level of documentation, along with a short rationale.

- ☐ EIS
- ☐ EA
- ☐ CE/CX/CATEX with documentation
- ☐ CE/CX/CATEX without documentation

_____

_____

_____

6. List any known consultation requirements or permits.

- Air quality
- Water quality, wetlands, floodplains, etc.
- Threatened, endangered, and sensitive animals, plants, or fish
- Cultural sites
- Others? _____

7. Profile the current management direction in and near the project area. *This often is a summary profile of the existing environment, with reference to high-level planning documents. (See item 3 above.) This profile also sets the baseline conditions in nearby areas that have had, are having, or will have impacts on the project area.*

8. Summarize projected public involvement.

- *List other federal, state, local, private individuals, or private groups known to be interested or potentially affected by the proposed project. (See item 6 above.)*
- *List proposed strategies for contacting and involving the parties listed.*

9. Summarize the schedules for the analysis and the documentation.

- *Analysis steps: baseline surveys, review of the literature, team meetings on alternatives, interaction of actions and resources (synergy between resource impacts), mitigations, revised alternatives, etc.*
- *Documentation checkpoints: draft of purpose and need and issues (Chapter 1); preliminary description of alternatives (Chapter 2); organizational structure of Chapters 3 and 4; initial drafts of impact sections (Chapter 4), etc.*
- *Checkpoints (dates) when the responsible official will review the IDT's evolving work*
- *Publication dates for internal drafts and then publishable versions of the DEIS, FEIS, ROD, EA, FONSI, or CE*

10. Summarize documentation expectations (quality standards).

Estimated length (page count) _____

Page layout and expectations as to graphics (baseline maps, etc.) _____

Headings and associated numbering conventions _____

Tracking between chapters, including previews, repetition, and other design decisions _____

Record keeping standards for the administrative record/analysis file _____

11. List all IDT members.

Team leader _____

Core team members _____

Outside contributors _____

Document writer/editor (if different from above) _____

Managers responsible for members' time and funding (if different from responsible official) _____

12. Review and reaffirm, as necessary, how the team will make decisions. *Will the team use a voting process or work toward consensus? Such decisions are especially important if a team member has a differing viewpoint than the leader or other members. Remind members that the IDT does not choose an alternative, nor do members sign the Finding of No Significant Impact (FONSI).*

13. Request dated signatures from the responsible official (or his/her deputy), the IDT leader, and all team members.

Appendix B— Checklist on Document Quality

Checklist on Document Quality

Directions: Circle one response number for each question.

	Not Adequate	Adequate But Could Be Improved	Excellent
Level 1: Content, Format, and Organization			
1. Does the document format (page layout) aid readers to navigate from chapter to chapter and section to section? ***[Documentation Strategies—Page Layout and Emphasis]***	1	2	3
2. Do readers know when they begin the document, a chapter, or a subsection what they are going to read and why? ***[Documentation Strategies—Organization, Emphasis]***	1	2	3
3. Are legal, regulatory, and policy implications clearly stated?	1	2	3
4. Are sections and subsections clearly and logically linked, usually through headings, subheadings, and deliberate repetition of key information? ***[Documentation Strategies—Organization, Emphasis]***	1	2	3
5. Do conclusions and recommendations appear at the beginnings of sections, subsections, paragraphs, and sentences? ***[Documentation Strategies—Organization]***	1	2	3
6. Are graphics (tables, figures, charts, graphs, illustrations, and maps) used effectively to convey information? ***[Documentation Strategies—Graphics for Documents]***	1	2	3

Key

1 = Not Adequate: Causes reviewer to provide suggestions for fixing
2 = Adequate But Could Be Improved: Causes reviewer to provide suggestions for improvement
3 = Excellent: No comments required by reviewer

	Not Adequate	Adequate But Could Be Improved	Excellent
Level 2: Paragraphing and Sentence Structure			
7. Are paragraphs clear and readable? Do lists and graphics replace, as appropriate, dense, unreadable paragraph? ***[Documentation Strategies—Paragraphs, Lists, Graphics for Documents]***	1	2	3
8. Do sentences move clearly from old information to new information so that the logic is smooth and understandable?	1	2	3
9. Are sentences relatively short (on average)?	1	2	3
10. Are sentences free from unclear and confusing jargon (also called gobbledygook)? ***[Documentation Strategies—Gobbledygook]***	1	2	3
Level 3: Grammar, Spelling, and Punctuation			
11. Is the document free from errors in word choice (including errors in pronouns and in the agreement of subject and verbs)? ***[Documentation Strategies—Word Problems]***	1	2	3
12. Are all words correctly spelled and consistent from section to section?	1	2	3
13. Is the punctuation clear (that is, helpful to readers) as well as being correct? ***[Documentation Strategies—Commas]***	1	2	3

Key

1 = Not Adequate: Causes reviewer to provide suggestions for fixing
2 = Adequate But Could Be Improved: Causes reviewer to provide suggestions for improvement
3 = Excellent: No comments required by reviewer