## Who Rewrites Your Draft Text?

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If the answer is anyone besides you yourself, you aren't writing as efficiently as you should. Shipley consultants have always advised technical and scientific writers to be responsible for their own revisions. Managers, project leaders, and colleagues can and should provide review comments and suggestions, but the writer should be responsible for drafting revised text.

The following three topics address questions and options regarding who is responsible for rewriting irrelevant and unfocused text:

**A. An actual problem situation where writers have written text that doesn't fit the projected NEPA document.**

**B. Seven suggestions for dealing with inappropriate, rambling text.**

**C. NEPA coordinator vs. NEPA technical editor/proofreader.**

You as the writer of technical or scientific text should know better than anyone else what needs to be written. For NEPA documents, a resource specialist knows best what an EIS or EA should include about a specific resource. A resource specialist knows the technical vocabulary and the technical concepts necessary for conveying resource conclusions.

Yes, at times, a NEPA team leader rewrites a difficult passage, but the team leader should always check the revised text with the resource specialist. Often, the specialist will find clumsy phrasing or outright errors because the team leader is rarely in full command of the technical and scientific information.

Assumptions about revision rely on **a major myth:**

**A technical editor can successfully rewrite technical or scientific text, adding details, correcting misleading statements, and polishing the language.**

In my 40+ years of technical writing and editing I have found few, if any, instances where a technical editor was able to rewrite complex text successfully (that is, explaining technical concepts and drawing relevant conclusions missing in the original draft). Most of the time, a technical editor corrects an abbreviation or misspelling, checks for consistent information in graphics and text, and makes other cosmetic changes.

### A. An actual problem situation where writers have written text that doesn't fit the projected NEPA document.

A NEPA project leader recently asked the following question during a Shipley Group NEPA workshop:

> "What would be the best strategies for condensing extensive resource reports so that information fits into a projected EIS?"

The project leader went on to explain the reasons for her question. She estimated that about 15 resource specialists had each written a 30- to 40-page report for an upcoming EIS. All of these drafts reflected the specialists' personal choices as to content, format, and organization.

The agency preparing the EIS had set a target length for the EIS of about 250 pages (excluding appendices). Given this target, the project leader estimated that no more than 175 total pages should go into a combined chapter on the affected (existing) environment and on environmental consequences. This combined chapter would combine chapters 3 and 4 of a traditional EIS.

**The problem, then, was that only one in every three pages from the specialists' completed reports could go into the projected EIS.**

(It is hard not to be a Monday morning quarterback given this problem! The project leader and her manager should never have let the specialists produce such idiosyncratic and windy reports. From day one of the project, the resource specialists should have had firm assignments to produce usable text for insertion into the EIS. Page limits on these submissions would have been a good management strategy.)

Realistic options begin, however, with the above problem. I discuss the following suggestions based

on the assumption that the finished resource reports would fail to identify and explain impacts adequately. Often I hear from NEPA editors that they have to search for impact conclusions in resource reports. And if a report identifies impacts, the context and intensity for these impact conclusions are often weak or missing.

The following list of suggestions would work equally well for the above problem and for a team of specialists who have yet to write their draft reports. In both cases, I would argue for planning and preparation time spent with the specialists before turning them loose on the writing and rewriting of resource information.

### B. Seven suggestions for dealing with inappropriate, windy text.

A. **Convene a meeting with all NEPA specialists to address what impact indicators they would choose** and how these indicators would be recorded in the Chapter 2 matrix summarizing impact. Note that this step precedes their starting to condense their lengthy draft reports.

B. **Ask all specialists to identify the essential text** (from their already drafted reports) that would support the impact information to be summarized in Chapter 2.

C. **Give all specialists a clear chapter format and detailed EIS outline for them to follow** as they condense their draft text. In light of steps 1 and 2, set a page limit on the text each specialist can submit for the EIS.

D. **Ask specialists to rework their initial reports**, pulling out material and adding information as necessary. Remind them that the submitted text should fit into the EIS/EA with little or no revision.

E. **Also remind specialists to support their impact conclusions and their context and intensity information with credible, up-to-date citations.**

F. **Ask all specialists to submit complete bibliographic information for all citations**, including photocopies of pages cited. This bibliographic information should come in with their submitted reports, not days or weeks later.

G. **Assign specialists to review each other's draft text for overall consistency (and clarity).** All contributing specialists, not the team leader or a NEPA editor, should be responsible for the overall technical quality of the EIS or EA.

**Discussion of the Seven Suggestions**

**Suggestion 1** is a crucial starting point. Shipley consultants have found that contributors to a complex document should start with the end product and work backwards. The summary matrix in Chapter 2 records the major conclusions about resource impacts. Everything the specialists write should support this summary matrix.

So who better than the specialists themselves to work up what the summary matrix should record? And wouldn't it just be good planning to ask for the design of the summary matrix before the specialists complete their backup reports?

**Suggestions 2, 3, and 4** assume that text from the specialists should fit a predetermined format. So if the EIS is to appear in columns and use five levels of headings, then all submitted text should match these givens. Submitted paragraphs would be short enough to fit the chosen columns, and text would be designed to match five levels of headings.

The preceding points affirm a key Shipley assumption: **Text as it is written should match the overall design and format of the document to be produced.**

Too often, writers assigned to a project begin to write before engaging their brains. They write text before they and other contributors have taken time to visualize the final document. Such an approach to writing was how many of us learned to write in school. The focus of school writing was text and more text because language correctness was the teacher's goal. Lengthy text forced students to make dozens of language choices and thus show their mastery of correctness.

In the school context, format was a late-stage worry, if it was a worry at all.

Published writers a generation ago approached writing with the same school approach. They wrote text and more text, and when the draft was "done," they passed it over to an editor and a graphics specialist for publishing. The best editors from that era were reported to ask writers to make major deletions and revisions to their submitted drafts.

Editors in this vanished era did help writers rework and rewrite pages and pages of text when a draft was too long or unacceptable. Notice that these editors did not rewrite the text themselves. The authors were always responsible for paring down lengthy, rambling text, not laboring through a rewritten version.

Computers have changed how we write documents. Today's writers are their own format and graphics specialists. Editors, if they exist, are often responsible for checking grammar and punctuation, not for making substantial changes. An assumption seems to be that once an author has written text, all that needs to be done is to put it through final editing (often called copyediting) and go to publication.

Extensive rewriting always was and is still today a waste of time and money.

A writer's goal today should be to write appropriate text the first time, not depend on review and extensive rewriting. Today's writers (at least in environmental and technical documents) should write text that fits the overall conceptual design of the final document. If properly written, draft text in today's technical world should be as close to the final product as possible.

**Suggestions 5 and 6** remind today's writers that their citations should be as clear and credible as possible. Here is a simple example of a citation that is neither clear nor credible:

> "The potential for livestock to adversely affect native herbaceous plants can be greatest when consistent heavy spring use occurs during the critical growth period. Trampling, over utilization, and defoliation of palatable species would have short-term adverse impacts on upland vegetation (Peacock and Jameson 1947; Ralphs et al. 1978; Aliota and Smythe 1998; and Carlson 2002)."

Which specific conclusions come from the cited studies? Are all of these studies equally relevant to the project area addressed in the EIS? And finally, what specific sections (or pages) are applicable to the conclusions presented in the EIS?

References should be tightly focused and connected to the project area. Consider the following rewritten version of the preceding example:

> "Two recent studies analyzed livestock grazing during the spring and its adverse effects on the native herbaceous plants. These studies (Aliota and Smythe, 1998, 36-38 and Carlson 2002, 118-124) surveyed late spring grazing on California allotments similar to ones in the project area. Both studies concluded that adverse impacts from spring grazing would last throughout the entire initial season when spring grazing occurred. If livestock grazing was not allowed the following year, plants would rapidly recover, so the initial adverse impacts would be short-term (lasting for the initial season and only negligibly visible by the end of a second recovery season)."

The preceding rewritten version is longer than the original, but length should not be the issue. The content is clearly more credible, and certain crucial NEPA information is added (the explanation of what short-term means within the cited studies). In addition, citing the page numbers of the relevant information should save time and energy because the specialist would have to submit fewer pages from the cited documents.

**Suggestion 7** reinforces the need for all technical specialists to be responsible for their own information and for its successful integration into the final EA or EIS. The NEPA coordinator does have a role, but all specialists should allocate time to review text submitted by other specialists. This review is an essential quality assurance step in the preparation of a complex document, especially one from multiple contributors. This review is also a good organizational tool for making all contributors aware of just what is expected when they submit technical or scientific information.

### C. NEPA coordinator vs. NEPA technical editor/proofreader

Several years ago a land management agency in Nevada hired what they were calling "a new district NEPA person." I was fortunate enough to be at the district the week this new NEPA person arrived. She had been hired because she had some resource experience in grazing (having been a prior employee at the district), plus she had good writing skills. The district had not yet prepared a job description for her.

Based on comments from several district employees and from the new hire herself, this NEPA person's job was going to be to review each draft internal EA or categorical exclusion. The picture almost seemed to be that she would wait in her cubicle until someone finished a draft document, which would arrive at the cubicle for her review.

What is wrong with this picture? Here are several of the obvious problems:

- She would not have a role in early NEPA analysis steps (level of document, purpose and need, proposed action, etc.).
- She would be working with a nearly final document, thus one difficult to change in any substantive way.
- She would be reviewing a document that the writer (and likely others) viewed as nearly ready to go out the door.
- She would be working as a NEPA editor/proofreader rather than as a NEPA coordinator.

The last of these problems is the most crucial one. A NEPA editor/proofreader is a valuable late-stage player in the NEPA process. But by this stage, an editor usually only works with the most obvious of content problems, and most of the time, the editor's comments will focus on language or grammatical gaffs.

Substantive content comments are not welcomed in a late-stage technical edit. After all, truly substantive comments usually mean that all or major sections of the draft document must be rewritten. Such changes are both time-consuming and frustrating to the writer(s) of the draft document. They are also frustrating to the district's managers, who are expecting to see a completed document out for comments.

Given these problems, I suggested that the newly hired NEPA person write her own job description, but to focus her job tasks on early NEPA coordination. The steps in such a job description included all seven points listed in Section B above. Notice that these tasks begin as early in the NEPA process as possible. After all, if a NEPA analysis process starts correctly, the likelihood of its going wrong and wasting time decreases.

Early coordination of the contributors also relies on an assumption that they are responsible for generating the draft text. Thus, these contributors are responsible for the content and overall NEPA adequacy of their documents. The NEPA coordinator's role is to help the NEPA process start correctly and to influence the nature and scope of the final document.

In most instances, the NEPA coordinator should not be writing major sections of an EA or EIS. At times, of course, the coordinator might draft a key section (such as the purpose and need statement), but the resource specialists would be responsible for the adequacy of their contributions to the EA or EIS.

If the NEPA coordinator is skillful, late-stage review should require very little rewriting and certainly no substantive changes to the overall document.

This approach to writing (and rewriting) is indebted to the common saying,

"Pay me now or pay me later."

NEPA contributors should take time to plan and coordinate their efforts now or they will sit through many late-stage meetings struggling to fix an analysis process and documentation that has gone haywire!

***Related Shipley Group Workshops:***

**How to Manage the NEPA Process & Write Effective NEPA Documents** – *January 24-27, 2006 – Las Vegas, NV.*

**Reviewing NEPA Documents/NEPA Writing Workshop** – *March 13-17, 2006 – Las Vegas, NV*