

Title: Annotated Outline
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SOP No.: 8
Issued by the Office of Planning and Environment (TPE)

1. Purpose

This document provides guidance on the development of annotated outlines. An annotated outline is a useful tool for managing the development of the environmental document (an environmental impact statement (EIS) or environmental assessment (EA)). It can provide FTA Regional staff and the project sponsor with an opportunity early in the environmental review process to establish the foundation for the document to assure it meets the goals of the National Environmental Policy Act (NEPA) implementing regulations and reduces delays and costs associated with its development, including those associated with review times.

2. Applicability/Scope

An annotated outline provides the foundation for preparing the environmental document, outlining, with some detail, what will be covered by the document in detail and what will not. The annotated outline is a stand-alone document developed from input received from the public and other agencies during scoping for an EIS (or informal scoping for an EA). The annotated outline helps define and prioritize the impact areas for further consideration and provides key information on document development (e.g., chapter content, identification of maps and other graphics, page number goals). To accomplish these purposes, annotated outlines should: (a) focus the discussion on major issues to be treated (40 CFR 1501.7(a)(2) and (3)); (b) set goals for conciseness and clarity by setting page limits (40 CFR 1501.7(b)(1), limiting descriptive passages to only what is necessary to understand the nature of the issues (40 CFR 1502.15), avoiding duplication of discussions in different sections (40 CFR 1502.16), and incorporating information by reference where possible (40 CFR 1502.21); and (c) set schedules, as appropriate, for the NEPA process (40 CFR 1501.8)).

TPE recommends completing annotated outlines for all projects requiring an EIS or an EA.

3. Responsibilities

FTA Regional staff should participate in developing the annotated outline and rely on it when reviewing drafts of the environmental document.

4. Standard Procedures

- 4.1. When to develop the annotated outline.** Regional staff should ask the project sponsor to prepare a draft of the annotated outline during the scoping process. Once scoping is complete, the Regional staff should review and edit the draft annotated outline, and ultimately approve the document (formally or informally) as it will guide the project team. Substantive FTA comments can include direction on the content, scope, and organization of the environmental document. Once the project sponsor responds to FTA comments and finalizes the annotated outline, the project team may begin the necessary analyses and field work to draft the environmental document and can opt to post the final annotated outline on the project sponsor's website to inform the public.

4.2. What to include in the annotated outline. The annotated outline should include information the project team needs to draft the environmental document, including the following:

- **Results of scoping.** The annotated outline should include input from scoping. The results of the scoping process will help FTA and the project sponsor identify the major issues for each section, or resource, and how they will be addressed in the environmental document. A thorough scoping process will refine the purpose and need statement, alternatives, and number and nature of the environmental issues relevant to the project; the annotated outline should reflect those refinements.
- **Purpose and Need.** The annotated outline should summarize the purpose and need developed in response to comments received during scoping, and may also identify any additional information to be included in the purpose and need chapter/section of the environmental document. If applicable, this section should note any previous planning studies/decisions that helped to determine the project's purpose or need.
- **Alternatives.** The annotated outline should include the list of alternatives retained for detailed study through the environmental review process, and may include the list of dropped alternatives, as appropriate. If applicable, this section should note any previous planning studies/decisions that affect the alternatives being evaluated. Additionally, as it is especially helpful to include graphics in the Alternatives chapter/section of the environmental document; the outline should note (and possibly describe) any intended use of graphics, tables, or maps.
- **Environmental impact areas.** The annotated outline should identify the major environmental impact areas that will be addressed in the EIS or EA. The project team should also identify the level of detail needed after considering the relative importance of the impact (e.g., provide a bulleted list of resources with no impact and a brief summary of the resources with major impacts).
- **Applicable Federal and State regulations, guidance, and other authorizations.** The annotated outline may include a list of the Federal and State laws and regulations, guidance, and executive orders that apply to the project, including any associated consultation or coordination requirements, or authorizations (e.g. permits) needed during the environmental review process (e.g., coordination with the U.S. Army Corps of Engineers for impacts to Waters of the United States).
- **Document planning.** For each section, the annotated outline should include an estimated page length and a description of any appropriate figures or graphics.

4.3. Revisions to the annotated outline. There is no need to regularly update an annotated outline, but the project team may want to revise it to increase transparency if major changes occur after scoping (e.g., the addition of a new alternative or a new major environmental impact). Most changes to the project will be captured in the environmental document and/or administrative record as necessary, and do not need to be reflected in an annotated outline.

4.4. Using the annotated outline. The project sponsor should consult the annotated outline frequently when drafting the environmental document. Substantial deviations from the annotated outline should be discussed in advance by FTA staff managing the project. FTA should refer to the annotated outline when reviewing the draft of the environmental document.

5. References

- [Keys to Efficient Development of Useful Environmental Documents](#) (FTA, 2007)

APPROVAL:



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DATE:

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