



EXECUTIVE OFFICE OF THE PRESIDENT  
COUNCIL ON ENVIRONMENTAL QUALITY  
WASHINGTON, DC 20503

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**LENGTH OF ENVIRONMENTAL IMPACT STATEMENTS (2013-2017)**

This document presents information and statistical analysis on the length, by page count, of environmental impact statements (EISs) prepared by Federal agencies between 2013 and 2017 pursuant to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321-4347. Based on the available information and analysis, this report summarizes several factors that may influence the page length of EISs.

**OVERVIEW**

To conduct this analysis, the Council on Environmental Quality (CEQ) compiled information on draft and final EISs available on the U.S. Environmental Protection Agency's (EPA) public EIS database, as well as Federal agency and project websites.<sup>1</sup> CEQ identified 631 actions for which EPA published a notice of availability for a final EIS between January 1, 2013, and December 31, 2017, and for which a record of decision (ROD) was issued by June 7, 2018. For these 631 actions, CEQ was able to obtain the draft and final EISs for 568 actions. From each of these 568 sets of EISs, CEQ compiled the following information: number of pages in the draft EIS, number of pages in the draft EIS appendices, number of pages in the final EIS, and number of pages in the final EIS appendices. EIS page count and document length data in this report do not include appendices. To access the underlying data for this report, click [here](#).

Based on its review, CEQ found, across all Federal agencies, that for draft EISs, the average (*i.e.*, mean) document length in this sample was 586 pages, and the median document length was 403 pages. One quarter of the draft EISs were 288 pages or shorter (*i.e.*, the 25<sup>th</sup> percentile), and one quarter were 630 pages or longer (*i.e.*, the 75<sup>th</sup> percentile).

CEQ also found that, for final EISs, the average document length was 669 pages, and the median document length was 445 pages. One quarter of the final EISs were 299 pages or shorter (*i.e.*, the 25<sup>th</sup> percentile), and one quarter were 729 pages or longer (*i.e.*, the 75<sup>th</sup> percentile).

CEQ also found that, on average, the change in document length from draft EIS to final EIS was an addition of 83 pages or a 14 percent increase (shown in Figure 3). The median change in document length from draft to final EIS was an addition of 32 pages. One quarter of EISs increased by up to 6 pages between draft and final EIS (*i.e.*, the 25<sup>th</sup> percentile), and one quarter increased by 105 pages or more between draft and final EIS (*i.e.*, the 75<sup>th</sup> percentile).

CEQ's findings are provided in Figures 1 through 4 below. CEQ's NEPA regulations at 40 CFR 1502.7 state that the text of final EISs "shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages."<sup>2</sup> Of the final EISs in this sample, approximately 7 percent were 150 pages or shorter, and 25 percent were 300 pages or shorter. The skewed distribution of some EIS page counts (shown in Figures 1 and 2) indicates that there may be factors that cause some EISs to be much longer than is typical (*i.e.*,

deviation from the average is much greater for the longest documents than the shortest). This report does not attempt to measure the effect of these factors on document length.

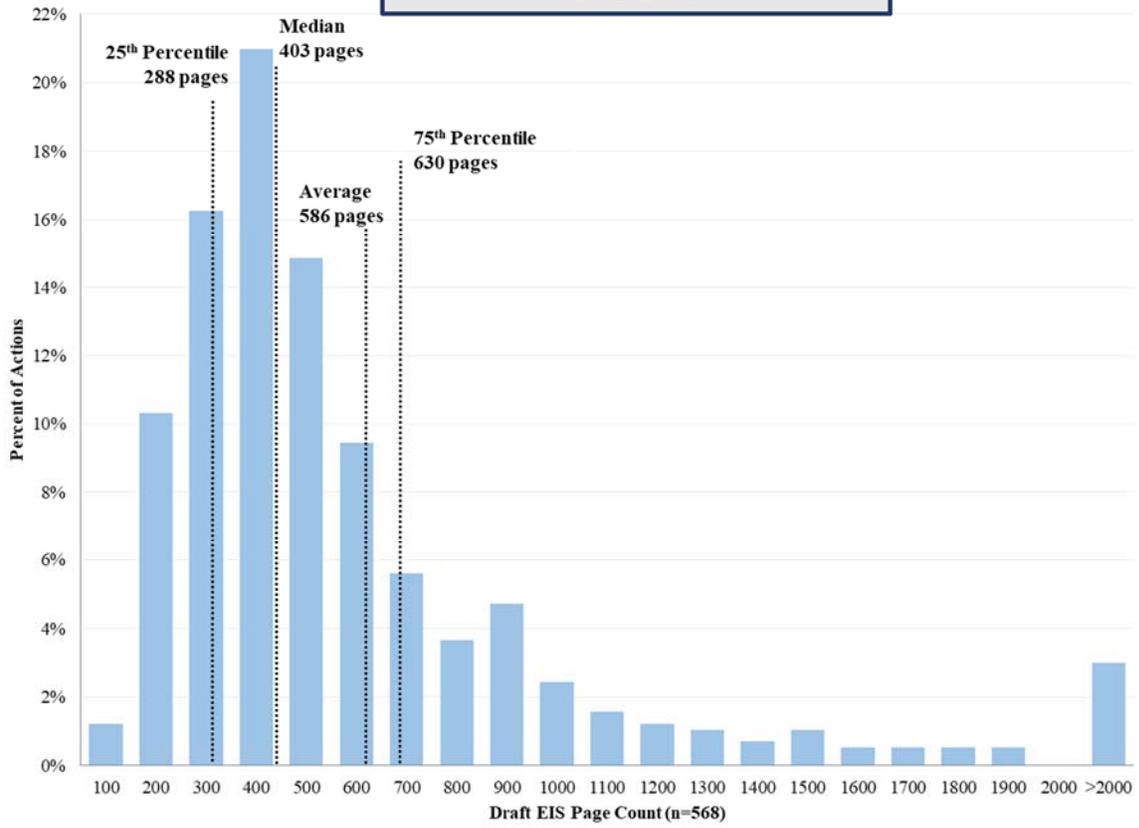
Factors that may affect the length of an EIS are:

- **Variation in Scope and Complexity:** Even within an agency, EISs may vary widely in technical complexity, the number of alternatives studied, the level of detail needed to address potentially significant environmental impacts, and other factors that may influence the length of the document. Examples of such factors include need for information to satisfy non-NEPA requirements,<sup>3</sup> unprecedented or unique actions for which existing analysis is unavailable for incorporation by reference, and the extent of community and stakeholder interest in a project. This document presents Federal Government-wide and agency-specific data, but does not subdivide EISs by sector or project type. This report does not attempt to identify particular factors or to measure their possible effect on EIS length.
- **Variation Among Agencies:** CEQ found variation among Federal agencies in draft EIS and final EIS average page count, as shown in Figure 3. This variation may reflect differences in management, oversight, and contracting practices among agencies that could result in lengthier documents. This also reflects whether agencies include responses to comments received on the draft EIS in an appendix to the final EIS (rather than in the text of the final EIS),<sup>4</sup> whether they include summary comment response documents in the text of the EIS, whether they attach copies of substantive comments to the final EIS,<sup>5</sup> or whether they use errata sheets for the final EIS (as an alternative to rewriting the draft EIS).<sup>6</sup> For purposes of this report, CEQ counted the length of comments or comment response documents as part of the final EIS unless they were identified as an appendix.<sup>7</sup> Agency practice may also vary within an agency; however, CEQ did not analyze EIS page length variation within agencies.
- **Multi-agency EISs:** The CEQ NEPA regulations direct agencies to cooperate on the preparation of EISs.<sup>8</sup> When multiple agencies are involved in the preparation of an EIS, as either co-lead or lead and cooperating agencies, the EIS prepared must satisfy the information needs of each agency's decision-making process. In these cases, the length of the EIS may increase in order to accommodate the level of detail required by each agency's underlying jurisdiction.
- **Potential Legal Challenges:** Agency decisions supported by EISs can be subject to legal challenges under the Administrative Procedure Act. In some instances, the length of EISs may be affected by agency considerations relating to potential future legal challenges.
- **Appendices to Draft and Final EISs:** CEQ's recommended page limits apply only to the text of the final EIS and do not apply to the appendices to the EIS.<sup>9</sup> Examples of information that agencies may include in an appendix to an EIS are: i) information prepared in connection with an EIS, ii) material that substantiates analysis in the EIS, iii) descriptions of methodologies used in the EIS, and iv) comments received on a draft EIS.<sup>10</sup> CEQ found that draft EIS appendices averaged 591 pages in length, with a median

of 199 pages. Final EIS appendices averaged 1,037 pages in length, with a median of 432 pages. The increase between draft and final appendices for some EISs is attributable to the inclusion of comments in the final EIS appendices. The large difference between the average and median values for the length of appendices (both draft and final) is the result of a number of unusually long appendix documents.

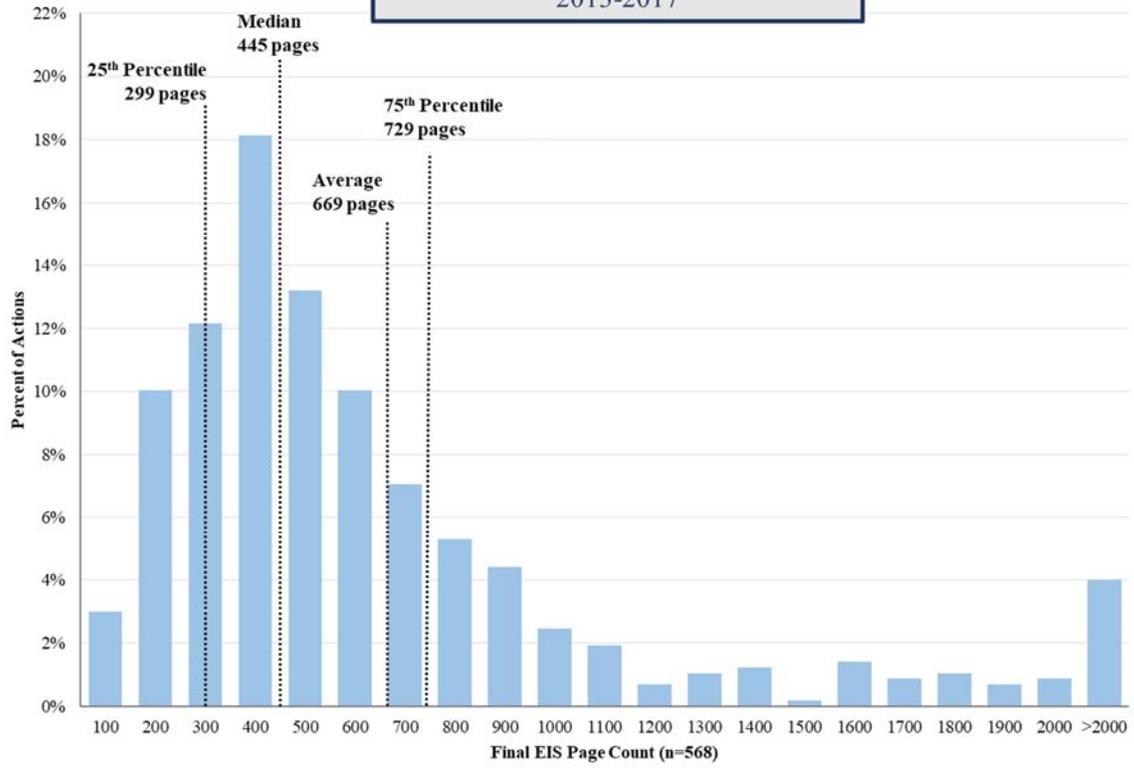
**Figure 1**

**Distribution of Draft EIS Page Counts  
2013-2017**



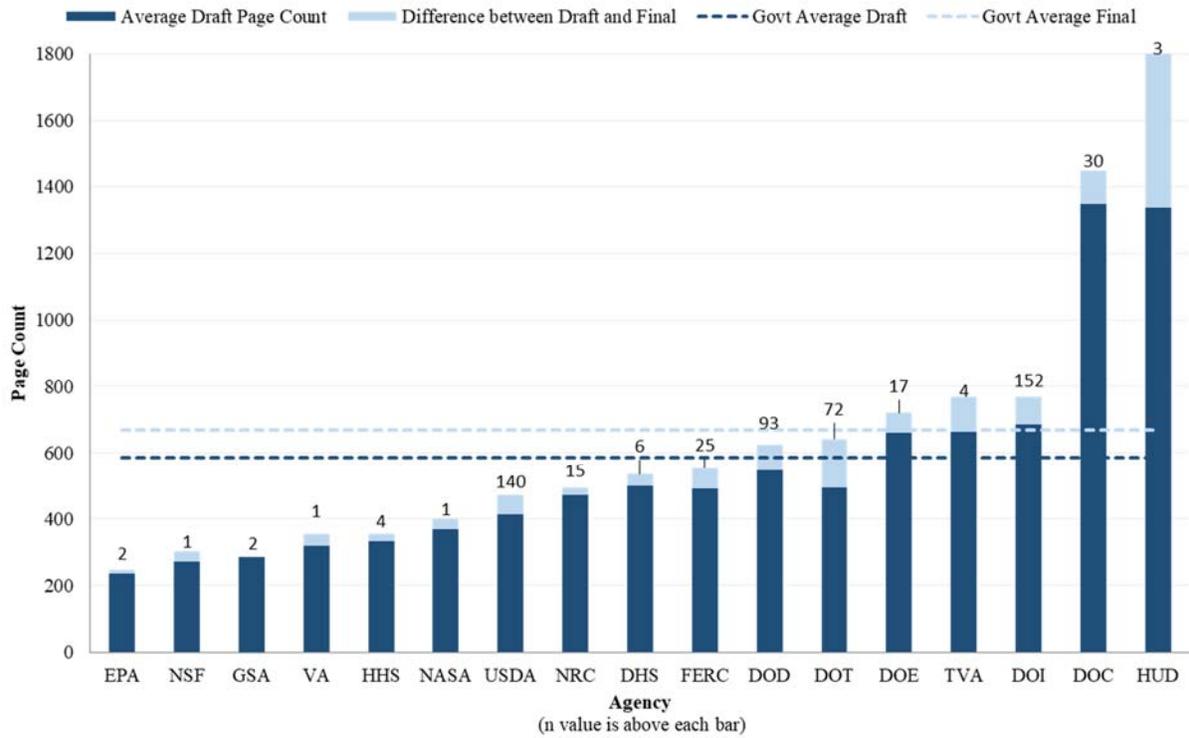
**Figure 2**

**Distribution of Final EIS Page Counts  
2013-2017**



**Figure 3**

**Draft and Final EIS Page Counts by Agency  
2013-2017**



**Figure 4: Agency Page Counts for Draft and Final EISs (n = 568)**  
2013 – 2017

<b>Agency</b>	<b>EISs Completed</b>	<b>Average Draft EIS Page Count</b>	<b>Median Draft EIS Page Count</b>	<b>Average Final EIS Page Count</b>	<b>Median Final EIS Page Count</b>
<b>Department of Agriculture (USDA)</b>					
Animal and Plant Health Inspection Service (APHIS)	6	222	203	224	205
Natural Resources Conservation Service (NRCS)	1	160	160	166	166
Rural Utilities Service (RUS)	1	390	390	463	463
United States Forest Service (USFS)	132	424	332	486	383

<b>Department of Commerce (DOC)</b>					
First Responder Network Authority (FirstNet)	5	5892	6716	6108	7086
National Oceanic and Atmospheric Administration (NOAA)	25	439	298	521	378

<b>Department of Defense (DOD)</b>					
National Geospatial-Intelligence Agency (NGA)	1	472	472	491	491
National Security Agency (NSA)	1	262	262	252	252
United States Air Force (USAF)	9	522	464	543	435
United States Army (USA)	9	389	350	380	374

<b>Agency</b>	<b>EISs Completed</b>	<b>Average Draft EIS Page Count</b>	<b>Median Draft EIS Page Count</b>	<b>Average Final EIS Page Count</b>	<b>Median Final EIS Page Count</b>
United States Army Corps of Engineers (USACE)	50	484	399	589	482
United States Marine Corps (USMC)	5	619	468	610	370
United States Navy (USN)	18	816	623	891	728

<b>Department of Energy (DOE)</b>	10	760	655	813	690
Bonneville Power Administration (BPA)	2	325	325	240	240
Western Area Power Administration (WAPA)	4	479	409	509	438
National Nuclear Security Administration (NNSA)	1	1083	1083	1619	1619

<b>Department of Health and Human Services (HHS)</b>					
Centers for Disease Control and Prevention (CDC)	1	254	254	286	286
Food and Drug Administration (FDA)	1	489	489	538	538
National Institutes of Health (NIH)	2	295	295	296	296

<b>Agency</b>	<b>EISs Completed</b>	<b>Average Draft EIS Page Count</b>	<b>Median Draft EIS Page Count</b>	<b>Average Final EIS Page Count</b>	<b>Median Final EIS Page Count</b>
<b>Department of Homeland Security (DHS)</b>					
Federal Emergency Management Agency (FEMA)	3	551	620	584	654
United States Coast Guard (USCG)	3	448	491	485	549

<b>Department of Housing and Urban Development (HUD)</b>	3	1337	928	1953	1226
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<b>Department of the Interior (DOI)</b>	2	1436	1436	1719	1719
Bureau of Indian Affairs (BIA)	5	413	361	538	380
Bureau of Land Management (BLM)	59	940	760	1044	806
Bureau of Ocean Energy Management (BOEM)	11	438	385	596	508
Bureau of Reclamation (BR)	14	817	555	1002	628
National Park Service (NPS)	38	459	353	448	368
Office of Surface Mining Reclamation and Enforcement (OSMRE)	3	990	960	1018	971
United States Fish and Wildlife Service (USFWS)	20	367	325	430	342

<b>Agency</b>	<b>EISs Completed</b>	<b>Average Draft EIS Page Count</b>	<b>Median Draft EIS Page Count</b>	<b>Average Final EIS Page Count</b>	<b>Median Final EIS Page Count</b>
<b>Department of Transportation (DOT)</b>					
Federal Aviation Administration (FAA)	3	446	368	567	670
Federal Highway Administration (FHWA)	46	428	296	645	311
Federal Railroad Administration (FRA)	10	741	589	753	552
Federal Transit Administration (FTA)	11	550	502	582	608
National Highway Traffic Safety Administration (NHTSA)	1	694	694	778	778
Surface Transportation Board (STB)	1	359	359	127	127

<b>Department of Veterans Affairs (VA)</b>	1	320	320	354	354
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<b>Environmental Protection Agency (EPA)</b>	2	235	235	246	246
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<b>Federal Energy Regulatory Commission (FERC)</b>	25	490	444	553	472
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<b>General Services Administration (GSA)</b>	2	286	286	279	279
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<b>Agency</b>	<b>EISs Completed</b>	<b>Average Draft EIS Page Count</b>	<b>Median Draft EIS Page Count</b>	<b>Average Final EIS Page Count</b>	<b>Median Final EIS Page Count</b>
<b>National Aeronautics and Space Administration (NASA)</b>	1	368	368	398	398

<b>National Science Foundation (NSF)</b>	1	272	272	302	302
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<b>Nuclear Regulatory Commission (NRC)</b>	15	473	360	493	368
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<b>Tennessee Valley Authority (TVA)</b>	4	664	333	769	503
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<sup>1</sup> Federal agencies are required to file EISs with the U.S. Environmental Protection Agency (EPA). 40 CFR 1506.9. The EPA database is available at <https://cdxnodengn.epa.gov/cdx-enepa-II/public/action/eis/search> and includes records of all EISs received by EPA since 1987. The EPA database includes the dates of EPA's publication of a notice of availability of a draft or final EIS. 40 CFR 1506.10. Under certain authorities, States, Tribes, and units of local government have been granted the authority to conduct NEPA reviews on behalf of Federal agencies (*e.g.*, the Department of Transportation's Surface Transportation Project Delivery Program under 23 U.S.C. § 327 and the Department of Housing and Urban Development's Community Development Block Grant Program under 42 U.S.C. § 5304(g)). EISs conducted by non-Federal agencies are included in this report if the Federal agency on whose behalf the EIS was being conducted filed the EIS with the EPA.

<sup>2</sup> CEQ's regulation on page limits applies only to certain sections of the final EIS (purpose and need, alternatives, affected environment, and environmental consequences). 40 CFR 1502.10(d)-(g). For the analysis in this report, CEQ calculated the aggregate page counts of the publicly available electronic versions of draft and final EISs, which also include other portions of the EIS (cover sheet, summary, table of contents, list of preparers, list of agencies, organizations and persons to whom the EIS was sent. 40 CFR 1502.10(a)-(c) and (h)-(j)). CEQ calculated appendices to EISs separately and discusses them later in this report. 40 CFR 1502.10(k). A final EIS includes comments received on the draft EIS and the agency responses to those comments. These comments and responses typically constitute most of the change in page length from draft to final EIS. 40 CFR 1502.10 does not identify where comments and responses should be included in the EIS, and 40 CFR 1502.7 does not count comments and responses against EIS page limits. Agencies typically use one of three approaches for incorporating comments and responses in a final EIS: include them as a chapter in the main volume of the EIS, include them as an appendix, or place them in a separate volume of the EIS (often referred to as a comment-response document).

<sup>3</sup> Consistent with 40 CFR 1502.25, agencies integrate some EISs with other documents necessary for agency decision-making, such as resource management plans. The practice of integrating EISs with other decision-making documents is intended to improve overall efficiencies, though it may increase the length of those EISs. For instance, NOAA routinely prepares integrated documents under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (*e.g.*, Omnibus Essential Fish Habitat Amendment 2), the Oil Pollution Act (*e.g.*, Deepwater Horizon Oil Spill: Final Programmatic Damage Assessment and Restoration Plan and Final Programmatic Environmental Impact Statement), and the National Marine Sanctuaries Act (*e.g.*, Fagatele Bay National Marine Sanctuary Management Plan and EIS).

<sup>4</sup> 40 CFR 1503.4(a).

<sup>5</sup> 40 CFR 1503.4(b).

<sup>6</sup> CEQ identified 107 final EISs or approximately 19 percent that were of equal length or shorter than the preceding draft EIS. Of those, 20 used errata sheets as an alternative to rewriting the draft EIS. CEQ's NEPA regulations state that agencies can attach errata sheets to the draft EIS, in place of rewriting the draft EIS, when changes in response to comments are minor (*i.e.*, factual corrections). 40 CFR 1503.4(c). These 20 errata sheet documents have an average length of 152 pages. (CEQ used the page length of the errata sheet document as the total for the final EIS, and did not add the length of the draft EIS.) CEQ found that errata sheet documents often included copies of stakeholder comments, as well as the agency's response to these comments, in the body of the errata sheet document increasing the length of those documents compared to including those items in an appendix.

<sup>7</sup> CEQ found that the number of pages between draft and final increased by more than 1,000 pages for 12 EISs and by more than 500 pages for 31 EISs. Many of these large increases are due to comments on the draft EIS and agency responses to those comments being counted as part of the final EIS.

<sup>8</sup> 40 CFR 1501.5 and 1501.6.

<sup>9</sup> 40 CFR 1502.7.

<sup>10</sup> 40 CFR 1502.18 and 1502.24.