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Subject: DRECP NEPA/CEQA – Readability

The DEIS is in clear, obvious violation of NEPA's requirement that documents be "concise" and "written in plain language", so the "public can readily understand them". Random readability tests show the text fails to be concise, and is very difficult to comprehend.

The Draft DRECP is greatly compromised. It must be rewritten for clarity, and to bring it into compliance with the regulations and the spirit of NEPA. More importantly, it would reduce the distinct possibility that the DEIS would lead to flawed decisions. This, of course, is the intent of the NEPA regulations and of the legislation that created NEPA.

NEPA §1500.2 Policy.

Federal agencies shall to the fullest extent possible:

*(b) Implement procedures to make the NEPA process more useful to decisionmakers and the public; to reduce paperwork and the accumulation of extraneous background data; and to emphasize real environmental issues and alternatives. **Environmental impact statements shall be concise, clear, and to the point**, and shall be supported by evidence that agencies have made the necessary environmental analyses.*

NEPA §1502.2 Implementation.

*(c) Environmental impact statements shall be kept **concise** and shall be no longer than absolutely necessary.*

NEPA §1502.8 Writing.

*Environmental impact statements shall be **written in plain language** and may use appropriate graphics so that decisionmakers and the public can readily understand them. Agencies should employ writers of clear prose or editors to write, review, or edit statements, which will be based upon the analysis and supporting data from the natural and social sciences and the environmental design arts.*

A number of tests have been created to measure text readability. To gauge readability of the DRECP DEIS I used two commonly used tests, Flesch Reading Ease, and Flesch-Kincaid Grade Level. Organizations such as insurance companies and government agencies use the tests when generating their documents. The Wikipedia entry provides a quick overview¹. The tests use formulas to create a numeric score based on the average number of syllables per word, and the average number of words per sentence. Microsoft Word can calculate these scores.

The Flesch Reading Ease test generates a score from 0 to 100. Higher score texts are easier to understand. One website, Readability Formulas², and Wikipedia use these score descriptions:

¹ URL for Wikipedia's description of the Flesch and Flesch-Kincaid readability tests:
http://en.wikipedia.org/wiki/Flesch%E2%80%93Kincaid_readability_tests#Flesch.E2.80.93Kincaid_Grade_Level

² <http://www.readabilityformulas.com/flesch-reading-ease-readability-formula.php>

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Flesch Reading Ease Score	Readability-Formulas	Wikipedia
90-100	Very easy	Easily understood by an average 11-year old student
80-89	Easy	
70-79	Fairly Easy	Easily understood by 13- to 15-year old students
60-69	Standard	
50-59	Fairly Difficult	
30-49	Difficult	
0-29	Confusing.	Best understood by university graduates.

Flesch-Kincaid scores are intended to correlate with US school grades. A score of 7.0, for instance, indicates an average seventh grade student can understand the text.

Below are results of testing random passages from the DEIS, copied into Microsoft Word 2013 so Word can generate the scores. Copies of passages with a page boundary include the page footers and headers – these were deleted before running the test. Some DEIS documents, when copied, treat each line of text as a separate paragraph, splitting sentences. These were not used, since they would distort the sentence length data.

Passage	Flesch Score	Flesch Rating	Flesch-Kincaid Score	Grade level
Executive Summary	5.4	Confusing	18.9	Graduate
II.1-1 to II.1-5	9.8	Confusing	19.3	Graduate
III.22-1 to .22-6	11.9	Confusing	16.7	Graduate
IV.7-506 to IV.7-513	16.9	Confusing	17.8	Graduate
VI-1, 1 st 4 paragraphs	13.1	Confusing	18.6	Graduate
Exec Summary, p.10, Components of the DRECP (1 paragraph)	13.6	Confusing	17.5	Graduate

These results are embarrassing. None of the Flesch scores come close to Standard (60-69). All are in the lowest range (0-30), described as Confusing. None even get close to the high of the Confusing range, 29. The Flesch-Kincaid grade level scores stay in the college graduate level.

The NEPA requirement to be concise is not trivial. The regulations recognize that a confusing document does not satisfy the intent of NEPA. Both the public and decisionmakers must be able to comprehend the document. With these low readability levels, comprehension is greatly compromised, with the distinct possibility of leading to flawed decisions.

Sincerely,



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