

## 454 EA & EIS Quality Assurance & Control

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## Introduction

ODOT developed these procedures to facilitate efficient, systematic, and flexible quality management of Environmental Assessments (EAs), Environmental Impact Statements (EISs), and supporting documents in order facilitate documents that are accurate, reader-friendly, and right-sized.

The term “EA/EIS documents” is used throughout these procedures to collectively refer to Environmental Assessments (EAs)/Findings of No Significant Impact (FONSI), Environmental Impact Statements (EISs)/Record of Decision (RODs), as well as revised and supplemental EAs/EISs and supporting documents such as technical/discipline reports.

## Quality Management

Quality management is the establishment and implementation of policies, processes, and responsibilities to ensure the overall quality of tasks and deliverables in project delivery. Two main components of quality management are quality assurance (QA) and quality control (QC). These procedures use the term “quality management” as a high-level reference to both QA and QC practices for development of EA/EIS documents.

## Quality Assurance

Quality Assurance (QA) is a system for achieving a desired level of quality through implementation of quality control (QC) procedures in the development, production, and/or delivery of products and services. The NEPA Manual governs statewide ODOT NEPA processes and procedures, including quality management for EA/EIS documents. QA for EA/EIS documents consists of regular NEPA Program review of the accuracy and efficiency of relevant sections of the NEPA Manual.

## Quality Control

QC activities take place during development of the EA/EIS document deliverable and include verifying and maintaining a desired level of quality in technical analysis and documentation, checking against standards and established criteria and verification of products. The procedures outlined in this section are intended to provide for efficient and consistent QC review of EA/EIS documents.

## Applicability and Objectives for QC Review Procedures

### Applicability for QC Review Procedures

These QC review procedures are applicable to ODOT's coordination and QC review of EA/EIS documents:

- Where ODOT acts as a joint lead agency for Federal-aid Highway Projects (FAHP) requiring an EA or EIS;
- Where a Local agency is the primary sponsor for a FHWA-assisted transportation project requiring an EA or EIS; and/or
- As governed by the FHWA-ODOT Oversight and Stewardship Agreement.

The procedures herein concern the QC review process for draft EA/EIS documents prior to publication and release to the public. Consultants, ODOT EA/EIS project teams, and local agencies (as applicable) shall implement these procedures during the preparation and review of EA/EIS documents. Standards and detailed guidance on how to prepare these EAs and EISs are located in sections 430 and 440, respectively, of the ODOT NEPA Manual.

### Objectives for QC Review

At a high level, the primary intended outcomes for these QC review procedures are to:

- Guide ODOT, Consultant, and Local agency EA/EIS document preparers and reviewers in developing high-quality drafts of EA/EIS document deliverables that are consistent with ODOT NEPA standards and procedures;
- Support compliance with CEQ and FHWA NEPA regulations as well as other applicable federal, state, and local environmental laws and regulations;
- Facilitate sound and informed decision-making via the preparation of reader-friendly, concise, well-reasoned, and consistent EA/EIS documents on a statewide basis;
- Support NEPA streamlining and timely completion of the environmental review process; and
- Reduce the QC review burden for FHWA Oregon Division and facilitate efficient FHWA NEPA decisions.

### Roles and Responsibilities for QC Review

ODOT Environmental Project Managers (EPMs)<sup>1</sup> and NEPA Program staff play critical roles in the QC review of EA/EIS documents. Each of these reviewers are unique in that: (1) they are

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<sup>1</sup> These procedures apply to any ODOT staff managing or overseeing implementation of the NEPA process and preparation/distribution of EA/EIS documents. This will most often, but not always, be an EPM.

ODOT’s transportation NEPA experts; (2) their review serves to ease the burden of FHWA Oregon Division Environmental Program’s review; and (3) they are among the few ODOT individuals who typically review the entire document. In addition to EPMs and NEPA Program staff, many other ODOT staff, consultants, and FHWA Oregon Division have a role in the QC review of pre-release EA/EIS documents. Additionally, where a local agency is co-sponsoring a project with ODOT, or is the sole sponsor and ODOT is providing NEPA oversight, the local agency also plays a role in the QC of EA/EIS documents. **Table 454-1** lists the primary roles and responsibilities for QC review of EA/EIS documents.

**Table 454-1 QC Review Roles and Responsibilities**

QC Reviewer	Stage of Review	QC Responsibilities
<i>ODOT Environmental Project Manager (EPM)</i>	Preliminary Draft; Administrative Draft	<ul style="list-style-type: none"> <li>• Provides ODOT’s primary oversight over implementation of the NEPA process and preparation/distribution of quality EA/EIS documents.</li> <li>• Serves as the primary ODOT liaison to FHWA and cooperating/participating agencies for NEPA process and EA/EIS document matters.</li> <li>• Serves as the primary coordinator of ODOT’s interdisciplinary team (SMEs) in terms of their involvement with NEPA process and documentation matters.</li> <li>• Serves as the primary ODOT point of contact for consultants or local agencies preparing FHWA EAs or EISs.</li> <li>• Works with consultants to integrate QC review tasks into the overall project schedule.</li> <li>• Performs QC review of each preliminary draft EA/EIS document.</li> <li>• Determines EA/EIS document readiness for FHWA review and approval.</li> </ul>
<i>ODOT NEPA Program Staff</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>• Maintains the ODOT NEPA Manual, which governs statewide ODOT NEPA processes and procedures, including quality management for EA/EIS documents.</li> <li>• Supports EPMs in the conduct of QC efforts for EA/EIS documents, including QC review of the preliminary and administrative drafts.</li> </ul>

QC Reviewer	Stage of Review	QC Responsibilities
<i>Consultant<sup>2</sup></i>	Preliminary Draft; Administrative Draft	<ul style="list-style-type: none"> <li>• Utilizes an internal technical editor to ensure reader-friendliness, consistency of writing and data, grammatical correctness, cohesion, proper level of conciseness.</li> <li>• Prepares and maintains project QA/QC plan.</li> <li>• Provides internal QC of project deliverables, including externally-prepared technical discipline reports supporting EA/EIS documents.</li> <li>• Provides QC documentation as required by these procedures when submitting preliminary draft EAs or EISs.</li> </ul>
<i>ODOT Transportation Project Manager (TPM), Resident Engineer-Consultant Project Manager (RE-CP), or Project Leader (PL)</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>• When serving as Contract Administrator for outsourced work involving preparation of EA/EIS documents, ensures that QC review is included in contract and performs QC review of preliminary draft.</li> <li>• As the primary coordinator between the project and ODOT traffic, roadway, and bridge disciplines in association with design and analysis of EA/EIS project alternatives, coordinates and confirms QC with these SMEs.</li> </ul>
<i>ODOT Subject Matter Experts (SMEs)</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>• Serve as part of EA or EIS interdisciplinary team responsible for reviewing technical discipline reports (including analysis methods) and individual resource sections of environmental documents.</li> <li>•</li> </ul>
<i>Oregon Department of Justice (DOJ)</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>• Provides QC review of preliminary draft EISs primarily to address legal sufficiency at the state level and specific to ODOT's interests.</li> <li>• Provides QC review of EAs on a case-by-case basis as determined by the ODOT EPM in coordination with key members of the project team, Region management, and ODOT NEPA Program staff, as appropriate.</li> </ul>

<sup>2</sup> For transportation projects falling within the scope of the ODOT / FHWA Oregon Stewardship and Oversight Agreement, all preparers of EA/EIS documents are required to follow these standard QC review procedures. These procedures refer to preparers as "Consultants," which is most often but not always the case.

QC Reviewer	Stage of Review	QC Responsibilities
<i>ODOT Region or UMO Manager</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>As the ODOT decision-maker for EIS projects and the ODOT signatory for EIS projects where ODOT is a co-lead agency with FHWA, may provide QC review of preliminary draft EAs or EISs.</li> </ul>
<i>Cooperating Agency</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>Provides input to EIS processes and serves as QC reviewer of preliminary draft EIS content concerning their expertise and jurisdictional authority, consistent with 40 CFR 1501.7(h), 40 CFR 1501.8, and 23 U.S.C. 139.</li> </ul>
<i>Local Agency</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>When serving as the project proponent/sponsor for EA or EIS projects or EA or EIS co-lead agency with FHWA, provides QC review of preliminary draft EA/EIS documents, as appropriate</li> </ul>
<i>ODOT Communications</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>Provides QC review of public involvement content in preliminary draft EA/EIS documents, as appropriate.</li> </ul>
<i>ODOT Civil Rights</i>	Preliminary Draft	<ul style="list-style-type: none"> <li>Provides QC review of EA and EIS projects where potential impacts to low-income, minority, or other disadvantaged communities is of heightened concern.</li> </ul>
<i>FHWA Oregon Division</i>	Administrative Draft	<ul style="list-style-type: none"> <li>Serves as lead federal agency and NEPA decision-maker; provides for FHWA QC review and approval of EA/EIS documents.</li> </ul>
<i>FHWA Legal Counsel</i>	Administrative Draft	<ul style="list-style-type: none"> <li>Provides QC review of administrative draft EAs and EISs primarily to address legal sufficiency at the federal level and specific to FHWA's interests.</li> </ul>

## Scope of QC Review

Adequate QC review will result in an EA or EIS that complies with the CEQ NEPA regulations and FHWA regulations, policies, and standards for the implementation of NEPA, as well as all other applicable federal, state, and local environmental laws. The following sections cover QC considerations to guide ODOT EPMs and ODOT NEPA Program reviewers in performing consistent and thorough QC reviews of EA/EIS documents. These considerations provide a fairly high-level lens and are not exhaustive.

## General NEPA Considerations

ODOT EPM and NEPA Program QC reviewers will check EA/EIS documents for:

- Adequacy and accuracy of the:
  - Project's purpose and need statement, logical termini, independent utility, and project description;
  - Description of public involvement and agency coordination efforts;
  - Scope, context, and conclusions of the impacts analysis; and
  - Responses to public and agency comments in the final document.
- Completeness of the alternatives identification and screening process, including information supporting the range of alternatives studied in the document and identification of the Preferred Alternative);
- Consistency between the EA/EIS document, supporting appendices, and technical reports;
- Proper identification and characterization of proposed avoidance, minimization, and mitigation measures, and indication that they are reasonable and practicable to implement;
- Proper grammar and verb tense:
  - Use of future conditional tense verbs such as “would” and “could” to describe the proposed action, alternatives, impacts, and proposed mitigation within the draft EA/EIS document (EA, DEIS);
  - Use of future tense verbs such as “will” to describe the Selected Alternative, impacts, and mitigation and other project commitments within the final EA/EIS document(s) (REA/FONSI, FEIS/ROD);
- Compliance with:
  - CEQ NEPA regulations (40 CFR §1500-1508) and other transportation NEPA-related requirements;
  - FHWA's *Environmental Impact and Related Procedures* (23 CFR §771), U.S. DOT's *Efficient environmental reviews for project decision-making* (23 U.S.C. §139), and other applicable FHWA environmental policies and guidance (e.g., FHWA Technical Advisory T6440.8A);
  - Other federal laws and regulations, as applicable, such as Section 7 of the Endangered Species Act, Section 106 of the National Historic Preservation Act, Section 404 of the Clean Water Act, Executive Order 12898 – Environmental Justice, Executive Order 11990 - Protection of Wetlands, Executive Order 11988 - Floodplain Management, and Section 4(f) of the U.S. Department of Transportation Act.
  - Required “Findings”;



- Applicable state requirements such as the Oregon Statewide Planning Goals and the State Agency Coordination Procedures for Adopting Plans for Class 1 and 3 Projects (OAR 731-015-0075).

For further information about preparing EA/EIS documents, including more detailed writing and style considerations, please see Sections 430 and 440 of the ODOT NEPA Manual, as well as:

- [AASHTO Practitioner's Handbook #15: Preparing High-Quality NEPA Documents for Transportation Projects;](#)
- [Improving the Quality of Environmental Documents;](#)
- [FHWA Memorandum on Improving the Quality of NEPA Documents; and](#)
- [ODOT Writing Style Guide \(intranet\).](#)

## Document Readability

EA/EIS documents should be written clearly and concisely, in a reader-friendly manner, with accurate information, correct grammar and spelling, and in plain English. They should contain summaries and conclusions from technical and discipline reports. Maps, figures, and illustrations should be used to help explain analyses and conclusions. Data presented should be consistent throughout the document. In short, EA and EIS documents should: (1) tell the story, (2) keep it brief, and (3) comply with the law.

## Document Length

Consistent with CEQ regulations implementing NEPA, the content and length of discussions in EA/EIS documents should be commensurate with the importance of the issues as they relate to the NEPA decision. Preparers of EA/EIS documents should limit pages in accordance with 40 CFR 1501.5(f) (for EAs) and 40 CFR 1502.7 (for EISs).

## Legal Sufficiency

Oregon Department of Justice (DOJ) legal sufficiency review is an important element in the QC review process for EISs. When conducting a legal sufficiency review, the assigned Oregon DOJ attorney will primarily assess the document from the perspective of applicable Oregon State legal standards, litigation risk to ODOT, and legal defensibility. Oregon DOJ review of the draft EA/EIS document should also consider whether the EA/EIS document properly represents ODOT's agency interests and whether it answers substantive questions which could be reasonably raised.

For EAs, legal sufficiency review is not a standard requirement, but may be requested as appropriate. The need for Oregon DOJ review of EAs is determined on a case-by-case basis by



the ODOT EPM in coordination with key members of the project team, ODOT Region management, and ODOT NEPA Program staff, as appropriate.<sup>3</sup>

FHWA Oregon Division review of administrative draft EA/EIS documents will typically include a federal-level legal sufficiency review conducted by FHWA legal counsel.

## Administrative Record

An Administrative Record is essentially a document repository to memorialize the NEPA process conducted as well as the primary environmental analyses supporting the NEPA decision. At a minimum, the Administrative Record will generally contain a project's final EA/EIS documents, documents memorializing the NEPA process, and decision-related records. The Administrative Record is considered an EA/EIS document deliverable and QC review of the Administrative Record should ascertain whether it is complete. Some projects can take many years to complete and project staff may change over time. This is one of the reasons it is important to document decisions throughout the environmental review process.

For an EIS, an Administrative Record organizational framework is typically created at the start of the project. For an EA, creation of an Administrative Record is optional, based on the risk of the project. Creation of the Administrative Record should be discussed early in the process when beginning the scope of the work for an EIS or EA and when discussing scope of the Consultant tasks.

For additional guidance, see the:

- [AASHTO Practitioner's Handbook 01 "Maintaining a Project File and Preparing an Administrative Record for a NEPA Study";](#)
- [FHWA Environmental Review Toolkit \(online\);](#) and the
- [ODOT NEPA Manual.](#)

Though a Consultant may set up and maintain the Administrative Record, the ODOT EPM is responsible for overseeing compilation of the Administrative Record. ODOT retains the final Administrative Record.

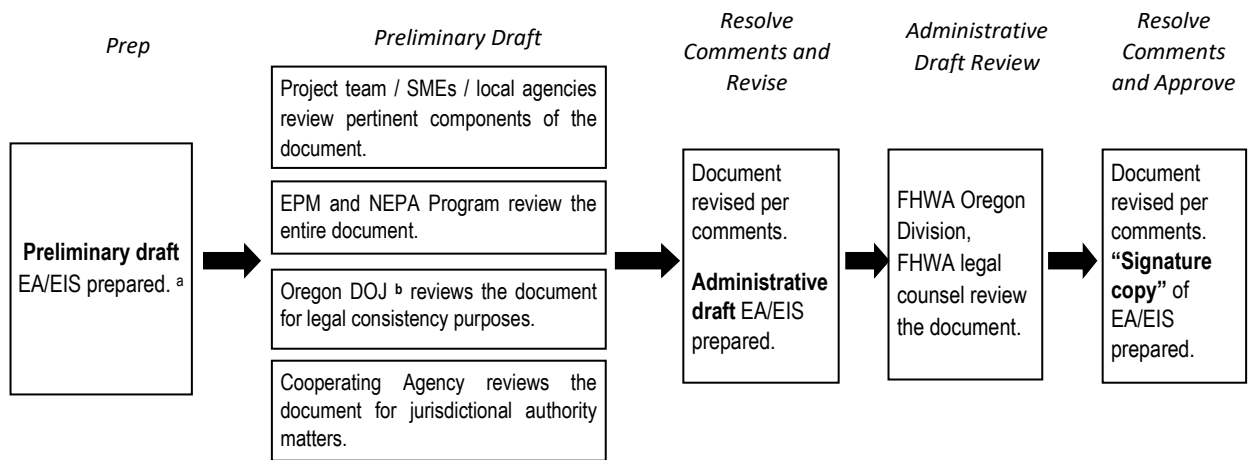
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<sup>3</sup> Likewise, when a local agency is the primary sponsor for a FHWA-assisted transportation project requiring an EA or EIS, the need for Oregon DOJ review is determined on a case-by-case basis by ODOT. Because Oregon DOJ's QC review is typically related to ODOT's interests as a state agency, DOJ's QC review may not be warranted when a local agency is the primary project sponsor and ODOT is not a sponsor.

## QC Review Process

### QC Review Process and Timeline Overview

EA/EIS document preparers develop the documents in accordance with sections 430 and 440 of the ODOT NEPA Manual and the project’s Statement of Work (SOW) tasks for EA and EIS deliverables. An overview of ODOT’s QC Review process for EAs and EISs is illustrated in the below process flow diagram Figure 454–1 ODOT EA/EIS Document Quality Control Review Process.



<sup>a</sup> ODOT EPM should be involved with preparation and pre-review of preliminary draft documents.

<sup>b</sup> For EAs, Oregon DOJ review is not an automatic requirement, and thus the need is determined on a case-by-case basis.

**Figure 454–1 ODOT EA/EIS Document Quality Control Review Process**

The QC review process for EA/EIS documents must be conducted efficiently and in a timely manner. The QC reviews of a preliminary and an administrative draft EA or EIS are critical milestones.

**Table 454-2** lists standard QC review timelines, which reflect a balance between the integrity of EA/EIS document quality control and a recognition of differing scopes of review per QC reviewer. Extension or reduction of QC review timelines may be permitted, if ODOT and FHWA provide written consent. Overall timelines for completion of EAs and EISs, as set by CEQ regulations, may not be negotiated.

These timelines assume that adequate and comprehensive early coordination with internal and external stakeholders and partner agencies has occurred and was well organized at the beginning of the NEPA process. The QC review process, including early coordination and the review timelines in **Table 454-2**, should be incorporated into the overall project schedule and shared with

QC reviewers as far in advance as possible. The schedule should be reviewed and updated regularly to allow for advance notice of changes to deliverables and/or review dates.

**Table 454-2 QC Review Times by Type of EA or EIS Document**

QC Review	QC Reviewer	EA	REA/FONSI	DEIS	FEIS/ROD
Preliminary Draft	Cooperating Agency	10 working days	5 working days	15 working days	10 working days
	ODOT Project Team	10 working days	5 working days	15 working days	10 working days
	Local Agency Sponsor	10 working days	5 working days	15 working days	10 working days
	ODOT SMEs <sup>4</sup>	10 working days	5 working days	15 working days	10 working days
	ODOT EPM	12 working days	12 working days	20 working days	20 working days
	ODOT NEPA Program	12 working days	12 working days	20 working days	20 working days
	Oregon DOJ	10 working days	10 working days	15 working days	15 working days
Administrative Draft	FHWA Oregon	12 working days	12 working days	20 working days	20 working days
	FHWA Legal <sup>5</sup>	30 working days	30 working days	30 working days	30 working days
	FHWA HQ <sup>6</sup>				

<sup>4</sup> If an ODOT SME requests an additional review period to verify revisions to technical reports based on QC review comments, the SME may complete this second "verification" review concurrently with FHWA review. However, this should occur primarily for complex projects or poor quality preliminary drafts and should not be considered routine practice.

<sup>5</sup> FHWA legal sufficiency review is required on all EISs and final Section 4(f) evaluations; legal sufficiency review of EAs is optional and conducted on a case-by-case basis as determined by FHWA OR Division and headquarters staff, as appropriate.

<sup>6</sup> Some projects may warrant a "prior concurrence" by FHWA Headquarters (HQ). For these selected, pre-identified projects, prior concurrence is a step in the project development process at which FHWA field offices obtain an approval, from HQ before proceeding

## QC Review Documentation and Filing

The QC reviews described in these procedures will be recorded and documented on the appropriate **Quality Control Review and Certifications Form** for the type of EA/EIS document: EA Quality Control Review and Certifications; Draft EIS Quality Control Review and Certifications; REA/FONSI Quality Control Review and Certifications; or Final EIS/ROD Quality Control Review and Certifications. The Quality Control Review and Certifications Form is intended to:

- Document QC review of content and completeness has been conducted at each stage of review (Preliminary Draft, Administrative Draft, Approval/Signature Copy) for the EA/EIS document;
- Record the names of QC reviewers and dates of QC reviews for specific sections and subsections of the EA/EIS document; and
- Document that the appropriate ODOT QC review procedures have been followed and the EA/EIS document is ready to publish and distribute.

Both Consultant and ODOT QC reviewers complete the Quality Control Review and Certifications Form during each stage of EA/EIS document preparation, review, and revision. Instructions and timing for completing the form are included on the form itself and in the QC Review Procedures, below.

## Certification of Consultant Internal QA/QC for EA and EIS Deliverables

Consultant-prepared NEPA and supporting documents must be developed to high quality standards prior to submittal of the deliverable to ODOT. Each Environmental Consultant is required to have a QA/QC Plan in place regarding preparation and QC review of draft EA/EIS documents and supporting deliverable documents. A primary intent of the Consultant's QA/QC Plan is to ensure that all draft NEPA and supporting documents are reviewed by appropriate Consultant subject-matter experts (SMEs) and a Consultant editor prior to submittal to ODOT. Internal Consultant reviewers must be, at a minimum, equally as qualified in the subject matter as the Consultant author. In addition to performing internal QC for accurate content and completeness, the Consultant QC review must include a thorough technical edit (spelling and grammar) and a review for readability, format, consistency, and structure. The Consultant must

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*with key approvals under NEPA; the prior concurrence is a finding that the project and document in question are acceptable from a policy/program perspective. Prior concurrence may apply to FHWA approvals for both draft as well as final EA/EIS documents, and is required on a case-by-case basis for projects with impacts of unusual magnitude, high levels of controversy, emerging or national policy issues under development, and/or Issues for which the Division office seeks policy assistance.*

record and certify completion of internal QC review on the Quality Control Review and Certifications Form.

## QC Review of Technical Reports

NEPA analysis requires an interdisciplinary approach. Multiple technical reports (aka discipline technical reports) are prepared in support of the Affected Environment, Environmental Consequences, and Mitigation chapters of EA/EIS documents. The disciplines and resources addressed within these technical reports may include, but are not limited to:

- Air Quality
- Noise
- Wetlands / Waters of the U.S.
- Water Quality / Hydraulics
- Floodplains / Floodways
- Threatened / Endangered Species
- Wildlife and Plants
- Transportation
- Right-of-Way and Utilities
- Hazardous Materials / Waste
- Geological / Geotechnical
- Visual Resources      Historic (Built) Resources
- Archaeological Resources
- Parks and Recreation
- Land Use
- Community / Social Resources
- Economics
- Environmental Justice
- Greenhouse Gas Emissions / Climate Change
- Energy
- Section 4(f)
- Cumulative Impacts
- Public Involvement / Engagement

All technical reports prepared by Consultants or local agencies in support of EA/EIS documents, as well as the analysis methods used in the technical reports, are reviewed by the assigned ODOT SMEs and follow discipline-specific Quality Management plans, procedures, and documentation. During the EA/EIS document QC review, the ODOT EPM or Consultant is not providing QC review of the supporting analysis methods or technical reports or memos, but rather verifying that the discipline-specific QC was completed and that the information and analysis contained in the EA/EIS document is accurate, consistent with, and properly summarizes the findings from the technical report or memo. For EA/EIS documents, the Consultant and ODOT EPM must record and certify completion of discipline section QC review on the Quality Control Review and Certifications Form.

## QC Documentation Filing

[PLACEHOLDER - FILING PROTOCOLS TBD]

## QC Review Procedures – NEPA EA/EIS Documents<sup>7</sup>

The following procedures apply to documenting QC review for any EA/EIS document, including an EA, Draft EIS, Revised EA/FONSI, and Final EIS/ROD. While the QC review *procedures* are the same, the QC *documentation* used to record and document QC review are unique and specific to each type of EA or EIS document (e.g. the EA Quality Control Review and Certifications Form would be used for an EA, while the Draft EIS Quality Control Review and Certifications Form would be used for a Draft EIS).

In addition, the focus of the QC review will be different depending on the type of NEPA document. For example, EAs and Draft EISs tend to focus on comparison of alternatives and disclosure of potential impacts, while FONSI and RODs generally focus on the basis for decision-making. QC reviewers should always consider the context of the EA/EIS document during QC review. For more information regarding the context and content of EA/EIS documents, please see Sections 430 and 440 of the ODOT NEPA Manual.

### Preliminary Draft QC Review Procedures

#### Preparation of the Preliminary Draft

- 1) The **Consultant** prepares the preliminary draft EA/EIS document in accordance with ODOT and FHWA guidance; state and federal requirements (as applicable); the tasks, deliverables and schedule described in the Consultant contract; and the Consultant's internal QC review plan.
- 2) The **ODOT EPM** provides oversight and direction during preparation of the preliminary draft EA/EIS document. The EPM regularly pre-reviews the preliminary EA/EIS document while it is in progress and in conjunction with the Consultant's internal QC review<sup>8</sup>. The ODOT EPM provides the Consultant with the appropriate **Quality Control Review and Certifications Form**.
  - a. ODOT EPM completes the Project Name and other project information fields (e.g. ODOT Key Number, NEPA Start Date) and the "Contact Information" section prior to providing form to Consultant.
- 3) The **ODOT EPM** or **Consultant** notifies those with a QC role (see **Table 454-1**) of the expected QC review period for the preliminary draft EA/EIS document and requests that the QC reviewers schedule adequate calendar time for QC review. Standard review timeframes are specified in **Table 454-2**.

<sup>7</sup> These standard QC review procedures may be adjusted, as appropriate to the specific project circumstances and/or to facilitate consistency with 40 CFR 1500-1508, 23 U.S.C. 139, and 23 CFR 771. Adjustment to these QC review procedures requires documented agreement between ODOT and FHWA.

<sup>8</sup> The ODOT EPM should coordinate with the Consultant to review the preliminary draft EA/EIS document while it is in progress to address issues and concerns early and to streamline review of the Consultant's final draft once it is submitted to ODOT.

- 4) When the preliminary draft EA/EIS document is complete, **Consultant** records and certifies completion of internal consultant QC review on the **Quality Control Review and Certifications Form** and submits the form, preliminary draft EA/EIS document, and any other relevant material to the ODOT EPM.
  - a. In the first column of the Quality Control Review and Certifications Form under “Consultant QC Review”, the Consultant records the name (first initial and last name) of the QC Reviewer and the date the review was completed for each section and/or sub-section of the preliminary draft EA/EIS document.
  - b. If a section and/or sub-section is not included or required for the document, the Consultant checks the box in the first column labeled “N/A”.
  - c. The Quality Control Review and Certifications Form for REA/FONSI and FEIS/RODs include an additional set of columns on the left, indicating revisions made to the EA or DEIS. For QC review of REA/FONSI and FEIS/RODs, consultant checks one of the “Revisions to DEIS” columns on the left indicating if the content was Revised or Not Revised based on comments received on the DEIS. If the content was not included in the DEIS, consultant checks N/A.
  - d. The Consultant completes and signs the “Preliminary Draft Certifications” at the bottom of the Quality Control Review and Certifications Form. The Consultant should complete both the “Environmental Consultant Project Manager” and the “Consultant Technical Editor” certifications.
- 5) The **ODOT EPM** reviews the preliminary draft and, using the **Quality Control Review and Certifications Form**, certifies that the preliminary draft DEIS is ready to be distributed for QC review and comment to the appropriate reviewers.
  - a. Having pre-reviewed the preliminary draft (see step #2 above), the EPM should provide a streamlined review.
  - b. The EPM completes and signs the first of the EPM “Preliminary Draft Certifications” at the bottom of the Quality Control Review and Certifications Form.
- 6) The preliminary draft DEIS is now ready to be distributed for QC review and comment to the appropriate reviewers.

## **QC Review of the Preliminary Draft**

- 1) The **ODOT EPM** or **Consultant** distributes the preliminary draft EA/EIS document to those with a QC role (see **Table 454-1**).
  - a. The distribution email will include a due date for reviewers to complete review and submit comments. Standard review timeframes are specified in **Table 454-2** and should have been previously communicated to reviewers in Step #3 above.



- b. The distribution email will inform reviewers of the appropriate format for comments. Appropriate formats could include tracked changes and comments in MS Word, the ODOT QC Comment Log, or an agreeable alternate method. ODOT reviewers will be asked to consolidate their comments to the degree possible and practicable.
- 2) The **ODOT NEPA Program Reviewer** supports the ODOT EPM by conducting a QC review of the complete preliminary draft EA/EIS document and recording their QC review on the **Quality Control Review and Certifications Form**.
  - a. The ODOT NEPA Program Reviewer completes and signs the NEPA Program Reviewer “Preliminary Draft Certifications” at the bottom of the Quality Control Review and Certifications Form.

## Comment Resolution and Revisions to Preliminary Draft

- 1) The **Consultant** will revise the preliminary draft EA/EIS document in response to the submitted comments as appropriate, addressing each reviewer’s comments and sending document revisions and/or comment responses to each reviewer.
  - a. Consultant will copy the ODOT EPM on such communications.
  - b. Where there are no major issues needing discussion, resolution of comments can be completed via email.
  - c. Only one iteration of review and comment is expected for reviewers of the preliminary draft document.
  - d. Complex projects or poor quality preliminary drafts may require further QC actions to address unresolved concerns. If comments are not resolved after one review iteration, Consultant and ODOT EPM may need to hold a comment resolution meeting with the reviewer(s) to ensure that critical comments in need of formal discussion are adequately addressed and expeditiously resolved.
  - e. Revisions to the preliminary draft document may need a follow-up review by the ODOT SMEs, EPM NEPA Program reviewer, or others if the comments were highly technical within the specific discipline, difficult in nature, or if requested by the reviewer.
- 2) The **ODOT EPM** will confirm the completion of comment resolution for the preliminary draft EA/EIS document and record and certify completion of ODOT’s preliminary draft QC review on the **Quality Control Review and Certifications Form**.
  - a. In the middle columns of the Quality Control Review and Certifications Form under “ODOT QC Review”, the ODOT EPM records their name (or the name of QC Reviewer if review was completed by someone other than EPM) and the date the review was completed for each section and/or sub-section of the preliminary draft EA/EIS document.

- b. The ODOT EPM completes and signs the second of the “ODOT EPM” certifications under “Preliminary Draft Certifications” at the bottom of the Quality Control Review and Certifications Form.
- 3) The document is now considered an administrative draft ready for review by FHWA.

## Administrative Draft QC Review Procedures

### FHWA QC Review of the Administrative Draft

- 1) The **ODOT EPM** oversees transmittal of the administrative draft EA/EIS document to FHWA for review.
  - a. The distribution email will include a transmittal letter and a due date for FHWA reviewers to complete the review and submit comments. Standard review timeframes are specified in **Table 454-2**.
  - b. The distribution email will ask FHWA reviewers to provide comments in an appropriate format, as agreed to by ODOT and FHWA. Appropriate formats could include tracked changes and comments in MS Word, the ODOT QC Comment Log, or an agreeable alternate method. FHWA reviewers will be asked to consolidate their comments to the degree possible and practicable.
- 2) FHWA comments on the administrative draft will be provided to the ODOT EPM to be transmitted to the Consultant<sup>9</sup>.

### Comment Resolution and Approval of the Administrative Draft

- 1) The **Consultant** will revise the administrative draft document as appropriate in response to the submitted comments, address each reviewer’s comments, and send document revisions and/or comment responses to each reviewer. The Consultant will record a response to each comment and provide explanation for and notation of any changes to the document during comment resolution.
  - a. Consultant will copy the ODOT EPM on such communications.
  - b. Where there are no major issues needing discussion, resolution of comments can be completed via email.
  - c. Only one iteration of review and comment is expected for FHWA reviewers of the administrative draft EA/EIS document. For some complex projects and where comments are particularly difficult to resolve, a second iteration of review may be warranted.
  - d. If comments are not resolved after one review iteration, Consultant and ODOT EPM may need to hold a comment resolution meeting with the FHWA reviewer(s)

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<sup>9</sup> Depending on the project and with prior agreement between ODOT and FHWA, FHWA may provide comments on the administrative draft to ODOT and the Consultant concurrently.

- to ensure that critical comments in need of formal discussion are adequately addressed and expeditiously resolved.
- e. Revisions to the administrative draft EA/EIS document may need a follow-up review by FHWA reviewers if the comments were highly technical within a specific discipline, difficult in nature, or if requested by the reviewer. The need for such a follow-up review will be determined by FHWA Oregon Division staff.
- 2) The **ODOT EPM** will confirm the completion of comment resolution for the administrative draft EA/EIS document and record and certify completion of ODOT's administrative draft QC review on the **Quality Control Review and Certifications Form**.
    - a. In the third column of the Quality Control Review and Certifications Form under "Admin Draft ODOT QC Reviewer", the ODOT EPM records their name (or the name of QC Reviewer if review was completed by someone other than EPM) and the date the review was completed for each section and/or sub-section of the administrative draft EA/EIS document.
    - b. The ODOT EPM completes and signs the "ODOT EPM" certifications under "Administrative Draft Certifications" at the bottom of the Quality Control Review and Certifications Form.
  - 3) **FHWA Oregon Division** approves the administrative draft EA/EIS document for release and public review.
  - 4) The **Consultant** finalizes an Approval/Signature-ready copy of the EA/EIS document and submits the form, signature-ready document, and any other relevant material to the ODOT EPM.
  - 5) The EA/EIS document is ready for final signatures and public release.
    - a. For a Draft EIS, FHWA Oregon Division submits EIS Notice of Availability (NOA) for publication in *Federal Register*.
    - b. Approval signatures are provided by lead agency officials.<sup>10</sup>
    - c. An EA or Draft EIS is released for public and agency review and comment. A Revised EA/FONSI or FEIS/ROD is released for public and agency review. (Public and agency comments are not solicited regarding the Revised EA/FONSI or FEIS/ROD.)

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<sup>10</sup> For FHWA Oregon Division, the signatory will typically be the Division Administrator. For ODOT, the signatory will typically be the applicable Region Manager or Office of Urban Mobility Manager.

## Revisions to QC Review Procedures

Version*	Changes and Reason for Revisions	Date	Responsible
1	Original		
1a	Grammar and other non-substantive edits made in response to QC Program review	September 2021	Melanie Ware

\* Version stays the same for minor changes with sub-version letter added.

## Appendices

**Appendix A** [Draft EIS QC Review and Certifications Form](#)

**Appendix B** [Final EIS/ROD QC Review and Certifications Form](#)

**Appendix C** [Environmental Assessment QC Review and  
Certifications Form](#)

**Appendix D** [Revised EA/FONSI QC Review and Certifications Form](#)