



Quality Assurance Report: 2024 FAHP Programmatic Project Notifications

**Project Delivery QA/QC Program
Oregon Department of Transportation**

August 2025

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1.0 Introduction & Executive Summary

This report presents the findings of a quality assurance (QA) review conducted on a selection of FAHP Programmatic Project Notifications submitted in the calendar year 2024. The primary objective of this annual review is to assess the efficacy of the current Quality Control (QC) process, identify areas for improvement, and address knowledge gaps among project teams.

Nine project notifications were evaluated against the standardized 'QC Checklist for FAHP Notifications'. These projects spanned nearly all regions with three in Regions 1 and 2 each, two in Region 3 and one in Region 5. Region 4 did not submit a FAHP Notification in 2024.

The review found that while many submissions were adequate and some were exemplary in their detail, several recurring issues were identified across multiple regions. Key areas requiring improvement include the consistency and sufficiency of project descriptions, accuracy in selecting affected species and project activities, including those requiring agency approvals. Additionally, clarity in stormwater management details was lacking and proper organization and completeness of supporting documentation was missing on several projects. This report provides a detailed analysis of these findings and offers actionable recommendations to enhance the quality and consistency of future FAHP notifications.

2.0 Review Methodology

The QA review was performed on a representative sample of nine FAHP Project Notifications completed and submitted during 2024. The Notifications submitted were prepared by a mix of consultants and internal ODOT staff, with ODOT staff comprising most submissions. Each notification was systematically evaluated against the eight core questions outlined in the official QC Checklist. A review team of 5 individuals reviewed each project and associated documentation against eight questions derived from the standardized 'QC Checklist for FAHP Notification' form. The review team consisted of the three NOAA Liaisons and two ODOT Biologists from two different regions in the state. The comments provided from each reviewer were collected and summarized in this report. The findings below document specific critiques and positive observations corresponding to each question.

Projects Selected for QA Review

Region	Key#	Sponsor	Notification Type	Project Title
1	18837	PBOT	FAHP	NE Columbia Blvd: Cully Blvd & Alderwood Rd
1	20329	ODOT	FAHP	OR43: Willamette Drive at Marylhurst Dr.
1	21598	ODOT	FAHP	OR224: SE 17th Ave- SE Rusk Road
2	21393	City of Springfield	FAHP	Mill Street: S. A Street to Centennial Boulevard
2	21737	ODOT	FAHP	OR6: Devils Lake Fork Wilson River Bridge
2	21760	ODOT	FAHP	OR131: Tillamook River Bridge
3	22020	ODOT	FAHP	Stewart Park Drive: South Umpqua River Bridge
3	22423	ODOT	FAHP	Sandy Creek Road at Mile Point 2.70
5	20539	ODOT	FAHP	I-84 Frontage Road Meacham Creek & Union Pacific Rail

Standard Project Notification QA Review Questions

- 1) Was the project information accurate and was the project description sufficient to detail all relevant project activities?
- 2) Were the appropriate species selected that may be affected by the project, including Critical Habitat? Was Essential Fish Habitat (EFH) appropriately selected if applicable?
- 3) Are all activities that may affect covered species or supporting habitat appropriately selected?
- 4) For projects that require approval from the Service(s), are the activities requiring approval accurately selected and is there sufficient detail describing these activities?
- 5) Where all portions of the stormwater section filled out correctly?
- 6) Are all impact and restoration metrics filled in appropriately for the 'Habitat Impacts' section, and do the level of impacts make sense based on the project description?
- 7) If there are anticipated avoidance/minimization measures, offsetting measures and enhancements, are they appropriately documented in terms of both purpose and quantity?
- 8) Were all relevant attachments included in the FAHP Notification package and/or FAHP folder?

3.0 Detailed Findings

This section moves through each of the review questions analyzed by the team. Reviewing all selected projects in relation to these specific questions provides a Quality Assurance review of how the FAHP Notification QC process was executed after the fact.

3.1: Project Information and Description

Q1 - Was the project information accurate and was the project description sufficient to detail all relevant project activities?

- **Critiques:** A significant number of submissions lacked the necessary level of detail. Common deficiencies included missing or inaccurate 6th field HUC and mile point information, insufficient discussion of "No Effect" determinations, and a general need for improved grammar. Project descriptions lacked critical details regarding Temporary Water Management (TWM), early coordination efforts (including dates and context), and specific information on relevant construction activities such as sandblasting. Clarity was also needed for stormwater water quality treatment plans and restoration details.

It was also noted that if early coordination isn't happening at a sufficient level, it will be hard for NOAA Liaisons to know how accurate the submitted FAHP Notification is.

- **Positives:** Despite the critiques, a few projects provided exemplary descriptions with a thorough level of detail that can serve as a model for future submissions.

3.2: Species, Critical Habitat and EFH Selection

Q2 - Were the appropriate species selected that may be affected by the project, including Critical Habitat? Was Essential Fish Habitat (EFH) appropriately selected if applicable?

- **Critiques:** This was a notable area of concern. Several projects across Regions 1, 2, and 5 were found to be missing species that should have been included. A recurring issue appears to be a misunderstanding of the impact area, specifically that stormwater effects must be considered all the way to the ocean. This led to incorrect species and EFH selections, particularly when a stormwater trigger was not identified.
- **Positives:** Approximately 30% of the reviewed projects correctly identified all applicable species, Critical Habitat, and EFH.

3.3: Selection of Activities Affecting Species/Habitat

Q3 - Are all activities that may affect covered species or supporting habitat appropriately selected?

- **Critiques:** Reviewers noted that various activity categories were frequently missed in submissions from Regions 1, 2, and 3. "General Construction" and "Paving" were commonly not selected activities when they should have been included. There was also an observed inconsistency between regions in selecting the "Mobilization/Staging" category, indicating a need for a clear, standardized definition for its use.
- **Positives:** The activities that were selected appeared to be accurate; the primary issue was the omission of other relevant activities rather than incorrect selections.

3.4: Service Approval and Justification

Q4 - For projects that require approval from the Service(s), are the activities requiring approval accurately selected and is there sufficient detail describing these activities?

- **Critiques:** Submissions were inconsistent in how they detailed the need for approval. The need for approval was not always explicitly stated or provided with sufficient detail. The lack of detail related to justifying why on-site stormwater treatment was not feasible or in explaining the creation of stormwater credits. In one case, a discrepancy was noted between the description section and the selected activity requiring approval.
- **Positives:** Projects from Regions 3 and 1 provided appropriate activity selections coupled with thorough descriptions providing good examples of how to complete this section.

3.5: Stormwater Management

Q5 - Were all portions of the stormwater section filled out correctly?

- **Critiques:** The stormwater section revealed several common errors. These included incorrect basin identification in the treatment table, missing flow arrows on diagrams, and a failure to identify reductions in impervious surface area (ISA). Unexplained differences between ISA and Contributing Impervious Area (CIA) calculations were noted multiple times in Regions 1 and 2. Discrepancies were also identified on stormwater tables related to off-site treatment.

There was also a lack of clarity regarding the ultimate receiving water body for runoff. Finally, in one instance, a project planned to use stormwater credits before the credit-generating project was complete.

- **Positives:** Some projects provided thoroughly detailed and accurate descriptions in the stormwater section, particularly projects in Regions 2 and 3.

3.6: Habitat Impacts and Restoration Metrics

Q6 - *Are all impact and restoration metrics filled in appropriately for the 'Habitat Impacts' section, and do the level of impacts make sense based on the project description?*

- **Critiques:** Only one project was identified that should have had the "N/A" applicable boxes checked on the FAHP Notification form that did not. This project did not have any impacts.
- **Positives:** Most projects correctly fell into the N/A category for this question. A project from Region 3 where this section was relevant handled the metrics and descriptions well.

3.7 Avoidance, Minimization and Offsetting Measures

Q7 - *If there are anticipated avoidance/minimization measures, offsetting measures and enhancements, are they appropriately documented in terms of both purpose and quantity?*

- **Critiques:** For the selected projects in this review, this question did not apply as there were no habitat impacts, as noted in section 3.6.

However, reviewers still suggested that more detail could be provided for certain measures, such as tree removal. The inclusion of site imagery was recommended as a valuable tool to highlight the scope of impacts (or lack thereof) concerning riparian impacts from bridge projects.

- **Positives:** A Region 3 project utilized the input fields effectively and provided a good description of its measures. This section was completed thoroughly and could be used as a model for other projects.

3.8 Attachments and Folder Organization

Q8 - *Were all relevant attachments included in the FAHP Notification package and/or FAHP folder?*

- **Critiques:** This was a significant logistical issue. Project folders were frequently described as disorganized or "busy," making them difficult to navigate due to multiple file versions. Common missing attachments included CIA maps, plan sheets, and figures for the General Scour Prism and Functional Floodplain. The latter of these are crucial when it comes to bridge repair projects.

Clarity was needed regarding the CIA boundary limits and total acre values. Reviewers also noted that stormwater figures should be included with the stormwater report for easier access.

- **Positives:** Several projects did include all the necessary attachments, even if they were sometimes difficult to locate within the FAHP folder structure.

4.0 Summary of Findings and Recommendations

The quality assurance review of the 2024 FAHP Project Notifications reveals several cross-cutting themes that require attention to improve the consistency and accuracy of future submissions. While individual projects demonstrated high quality, issues were prevalent across multiple regions.

4.1 Key Findings:

- Clarity and Completeness: A primary finding is the general lack of sufficient detail. Project descriptions often lacked critical information regarding construction methods, temporary water management, and early coordination efforts. Similarly, the stormwater management section frequently contained calculation discrepancies, incomplete diagrams, and unclear justifications for treatment strategies.
- Accuracy in Impact Assessment: There appears to be a knowledge gap regarding the full extent of project impacts, particularly concerning stormwater. This has led to the incorrect selection of affected species, Critical Habitat, and Essential Fish Habitat. Furthermore, project activities such as "General Construction" and "Paving" were regularly overlooked, resulting in an incomplete picture of potential effects.
- Consistency in Reporting: The review noted significant inconsistencies between regions in how certain activities, such as "Mobilization/Staging," were categorized. Likewise, the level of detail provided to justify the need for Service approval for specific activities varied widely, indicating a need for clearer standards.
- Documentation and Organization: A significant logistical impediment was the state of supporting documentation. Disorganized folders with multiple file versions and missing critical attachments (e.g., CIA maps, scour prism figures) made a thorough review difficult and inefficient.

4.2 Recommendations:

Guidance & Targeted training (internal and external)

Based on these findings, it is recommended that standardized guidance and training be developed to address these common deficiencies. This should include providing clear

examples of exemplary project descriptions, checklists for required attachments, and clarification on how to accurately assess the full impact area for species and stormwater.

Training should be offered internally to ODOT employees as well as externally for consultants etc. Additionally, updated guidance should also be disseminated internally and externally. When combined, training and guidance can improve consistency across the agency and among consultant partners.

These sessions could focus on the overall quality of submissions or be focused on specific topics and be shorter in length. Topic focus could range from how to provide enough detail in descriptions to a review of stormwater triggers.

Expectations to meet:

For more complex Notifications, there should be an expectation for a team meeting, especially if there are questions on a submittal. A meeting should be called to discuss each unclear project element to address issues without confusion. This should evolve into standard practice and could avoid needless back and forth via email. Currently, there isn't a standardized expectation to meet. This could avoid confusion, provide learning opportunities and increase the quality of submissions.

Improvements to documentation storage:

Adhering to a standardized folder structure and file naming convention is crucial to improve the efficiency of the review process. Addressing these issues can streamline the QC and QA processes and decrease the required review time.

Future QA Reviews:

After conducting this initial QA review of FAHP Notifications, there were lessons learned regarding quality of submissions as well as for the QA review process itself.

After feedback, the processes for future QA reviews of Notifications, Completion Reports or No Effects will largely follow this same format. However, it will be important and worthwhile to 'cycle-in' new review team members from the different Regions within ODOT. Different ODOT Biologists from different Regions can bring varying levels of experience and expertise that will help provide unique perspectives and drive objectivity in the review process.