Oregon Department of Transportation

Quality Assurance Report: 2023 - 2025 FAHP Project Completion Reports

Project Delivery QA/QC Program
Oregon Department of Transportation

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Table of Contents:

1.0 Introduction & Executive Summary

This report presents the findings of a quality assurance (QA) review conducted on a selection of FAHP (Federal Aid Highway Program) Programmatic Project Completion Reports (PCRs) submitted between 2023 and January of 2025. The primary objective is to establish an annual review to assess the efficacy of the current Quality Control (QC) process, identify areas for improvement, and address knowledge gaps among project teams. Given this is the initial review effort, multiple years were included to review a sufficient number of projects from across different regions. Future reviews will transition to a strictly annual review.

Six PCR's were evaluated against the standardized 'QC Checklist for FAHP Completion Report' document. These projects spanned nearly all regions with two in Region 1, one in Region 2, two in Region 3 and one in Region 4. Region 5 did not submit any FAHP PCR during this specific review period.

The review found that while several submissions were adequate in meeting requirements and some were exemplary in their detail, several recurring issues were identified across multiple regions and projects. Key areas requiring improvement included: the accuracy and consistency of project information entered into the different sections of the PCR, improvements in the documentation and filing procedures, and adhering to the established quality control process for PCR submissions. This report provides a detailed analysis of these findings and offers actionable recommendations to enhance the quality and consistency of future FAHP PCR submissions.

2.0 Review Methodology

The QA review was performed on a representative sample of six FAHP PCR's completed and submitted during the 2023 calendar year up until January 2025. This expanded review window was needed to sample a sufficient number of projects across multiple regions. PCR's submitted were prepared by a mix of consultants and internal ODOT staff, with ODOT staff comprising most submissions. Each PCR 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 the eight questions derived from the standardized 'QC Checklist for FAHP Completion Report' form. The review team consisted of two NOAA Liaisons and three ODOT Biologists from three different regions around the state. The comments provided from each reviewer were collected and summarized in this report. The projects identified in Table 1 and the findings in Section 3 below document specific critiques and positive observations corresponding to each question.

Table 1. Projects Selected for QA Review

Region	Key#	Sponsor	Project Completion Type	Project Title
1	K19120	City of Gresham	FAHP	SE 242nd/Hogan: NE Burnside - E Powell
1	K18772	ODOT	FAHP	OR212: UPRR Structure – US26 N Fork Deep Creek
2	K20743	Marion County	FAHP	Hollywood Dr: Silverton Rd. to Greenfield Ln. (Salem)
3	K22423	ODOT	FAHP	Sandy Creek Road at Mile Point 2.70
3	K22455	ODOT	FAHP	Greenway Path Emergency Repair
4	K22072	ODOT	FAHP	US 20 at Locust Street (Sisters)
5*	--	--	--	--

*There were no FAHP Project Completion Reports submitted by Region 5 during this review timeframe.

Standard Project Completion Report QA Review Questions

1) Is all project information filled out completely and accurately? This includes contact information and accurate permit numbers as well as any IWWE's (In-Water Work Window Extensions).
2) Is the entire 'Performance Summary' section accurately filled out? This includes the summary section at the end as well as a description of issues encountered in construction and how they were addressed.
3) Do the listed FAHP inspection dates match reports filed in the FAHP folder?
4) Is there any change from the Project Notification for impacts to habitat features and/or mitigation? If yes, is there clear justification for the differences and are all fields in the section complete with adequate detail?
5) Were there any changes to the stormwater section from the Project Notification? If yes, were updated images/plans provided as well?
6) Is all stormwater information complete and accurate?
7) Are all necessary attachments included and/or filed appropriately in the FAHP project folder? This includes as-built plans sheets and any updates to attachments such as stormwater information or bridge supplements.
8) Are there any other observations not addressed in the above questions? [*List other observations for each Project as applicable*].

3.0 Detailed Findings

This section moves through each of the review questions analyzed by the review team. Reviewing all selected projects in relation to these specific questions provides a Quality Assurance review of how the FAHP PCR QC process was executed after the fact. This QA review of PCR's is to be done annually to assess knowledge gaps and any lapses in the QC process itself as stated in Section 5.1.3 of the Statewide Endangered Species Act (ESA) Documentation Quality Plan.

3.1: Project Information - Completeness and Accuracy

Q1 - *Is all project information filled out completely and accurately? This includes contact information and accurate permit numbers as well as any IWWE's.*

- **Critiques:** All projects were lacking a FAHP project-specific permit number that details the specific numeric identifier unique to each project covered under the FAHP Programmatic. Additionally, a couple of projects were missing other, likely relevant, permits or did not fill out any permit information at all when it should have been included. HUC discrepancies were also identified between the submitted FAHP Notification for the project vs. the PCR. Other minor omissions included an incorrect key number for the project as well as missing IWW dates. Finally, one project was lacking project name consistency throughout the various required FAHP submittals.

  It was acknowledged by one reviewer that it might be difficult for the QA reviewer to know all the relevant permits that are required to be noted in the PCR upon initial review. This highlights the importance of the QC process related to reviewing PCR's. Finally, when scoring the responses of the reviewers on whether this question was appropriately addressed or not, it was an even split across the six projects reviewed.

- **Positives:** Despite the seemingly minor errors and omissions, the majority of the remaining fields were filled out accurately for these projects. This reinforces the need to focus on addressing the few common errors in this section to improve submission quality.

3.2: Performance Summary

Q2 - *Is the entire 'Performance Summary' section accurately filled out? This includes the summary section at the end as well as a description of issues encountered in construction and how they were addressed.*

- **Critiques:** Regarding performance summaries, there were a couple of projects identified that could have provided some more detail. As an example, two projects seemed to miss incorporating issues identified in construction inspection reports into the final PCR. The PCR is intended to provide a summary of the significant environmental issues encountered. Another example is that there was a project that included the addition of fish rocks as an element to enhance fish passage within the project area. Some detail on this project element would have been an excellent detail to include in the PCR as it is an important element to track in terms of compliance.

  Finally, there were a couple of projects where there simply was too little detail provided in the performance summary portion at the end of this section. Even if a project has relatively few minor impacts, a decent summary should still be provided to verify FAHP compliance.

- **Positives:** Despite the omission of certain details in the performance summaries or missing project elements, the majority of projects provided good and sufficient levels of detail in the summary portion at the end of this section. Additionally, multiple projects did include challenges encountered during construction as well as noting when corrections were made. Other relevant details included a great summary of the Best Management Practices (BMP's) used, regarding staging and containment, in construction to avoid any impacts to natural resources.

3.3: Listed FAHP Inspections

Q3 - *Do the listed FAHP inspection dates match reports filed in the FAHP folder?*

- **Critiques**: This was an area where there were several issues across the majority of projects reviewed. For example, there were multiple projects where inspection reports were missing and there was one project where no FAHP inspection was done for the project. There were also multiple incidents where there was a FAHP inspection filed in the shared FAHP folder for the project but that inspection wasn't noted in the actual PCR. Finally, there was a project that noted 'windshield surveys' in addition to actual formal inspections. While still able to provide some value, windshield surveys are

inherently less capable of a thorough on-the-ground inspection and perhaps should not be listed alongside formal FAHP inspections.

- **Positives:** Critiques notwithstanding, it is worth noting that several of the reviewers identified that the inspection reports filed provided a lot of great detail as well as helpful photos included as attachments to the inspections. Additionally, there was clarifying detail in the summary section of a PCR that detailed and justified why formal FAHP inspections did not continue after 2020 for a project officially ending in 2022.

3.4: Impacts to Habitat Features and/or Mitigation.

Q4 - *Are there any changes from the Project Notification for impacts to habitat features and/or mitigation? If yes, is there clear justification for the differences and are all fields in the section complete with adequate detail?*

- **Critiques:** While just two projects did not have impacts on habitat features, all other projects did and each of those four projects had errors in this section. Issues ranged from discrepancies in the metrics for habitat impacts between Notification and PCR (multiple projects) to simple errors like not marking either the 'No Change' or 'Not Applicable' boxes when they should have been selected or marking 'Not Applicable' in error. More specific information on metrics of habitat impacts were missing such as no information on number of willow stakes planted or fish rocks placed. One project was largely focused on tree removal and large wood installation, as noted in the Notification, but that information was missing entirely from the PCR.

- **Positives:** Two projects accurately marked this section as 'Not Applicable' as the only impacts were stormwater related.

3.5: Stormwater Management – Changes From Notification

Q5 - *Were there any changes to the stormwater section from the Project Notification? If yes, were updated images/plans provided as well?*

- **Critiques:** While there were multiple errors within the stormwater section, these errors largely came from a minor portion (33%) of projects in the review. Such errors largely surrounded discrepancies from the notification and a lack of explanation. For example, there were changes in basin sizing in the stormwater figures from the Notification compared to the PCR, and this change was not explained. There was then a discrepancy in the amount of untreated CIA from the Notification and PCR.

For another project, errors included the designation of on-site treatment in the completed BMP's table when, after review, it was determined that the appropriate designation was off-site treatment. Additionally, for this same project it was ultimately unclear if a stormwater credit was generated for the project.

- **Positives:** Of the projects reviewed 50% did not have any issues with the stormwater section. There was one project (16%) that did not have a stormwater element as a component of the project thus this section did not apply. There were multiple positive points noted in the stormwater sections of these three projects including the incorporation of a Drainage Facility I.D. (DFI), information for a bio retention facility, supportive information that documented that stormwater facilities were built according to the project plans and confirming the creation of a stormwater water quality treatment credit.

3.6: Stormwater Management Accuracy

Q6 - *Is all stormwater information complete and accurate?*

- **Critiques:**. Like the previous question, there were some errors related to discrepancies in PCR stormwater values compared to the Notification that were not explained. This directly informs whether stormwater tables are accurate. Explanation was also not provided why certain activities weren't triggering FAHP stormwater treatment requirements. This lack of clarity would inherently impact values entered into the stormwater tracking tables.
- **Positives:**. Despite overlap with some aspects of the previous question (3.5), additional details were identified with this supplemental question which touched on more specifics. This helps with more clarity in the QA review

  Most of these critiquing comments were centered on just a couple of projects in the review. In fact, the reviewers scored four of the projects as receiving an 80% 'Yes' or more response rate (. It was also noted by one reviewer that a project included the stormwater report for the project in the FAHP folder which greatly aided the QA review.

3.7 Necessary Attachments

Q7 - *Are all necessary attachments included and/or filed appropriately in the FAHP project folder? This includes as-built plans sheets and any updates to attachments such as stormwater information or bridge supplements.*

- **Critiques:** It was immediately apparent that one common error amongst all the projects was that there was no QC Checklist filed for the PCR. In fact, there should be two copies as there should be two rounds of QC for the PCR which is the same QC process for notifications. Additionally, one reviewer identified that two rounds of QC were not done for the Notification for one of the projects reviewed here. Another issue common to multiple projects in this review concerned the inclusion of as-built plan sheets. Without additional details or comments from preparers, it is hard to know if the project built everything according to plan. As such, if as-builts aren't included in the FAHP folder for a given project, it is hard to verify the project was built perfectly according to plan without a note somewhere. The issue is that a QA reviewer cannot tell if a project was built exactly to plan or if the preparer simply forgot to include the as-built plan sheets in the file. One project in the review did not include as-builts when it was expected as the project noted a change in streambed material.

  Other issues with the attachments worth noting were a missing FAHP inspection report and a lack of final photos included. While not explicitly required for PCR's, inclusion of photos can provide a more complete summary of FAHP compliance. This was particularly relevant as the project in question developed a stormwater treatment facility and photos would have provided further support that facilities were built to plan. Additionally, photos would have been beneficial to include for another project in this review that included the installation of fish passage rocks. When it comes to adding helpful attachments to validate compliance with the FAHP, the addition of photos is a simple, quick and effective tool to demonstrate such compliance.

- **Positives:** Critiques notwithstanding, multiple projects did include necessary attachments to verify compliance or made the correct determination that attachments were in fact not necessary. Stormwater supplemental documents and as-builts were provided by a couple of projects in this review noting that preparers are aware of some of the requirements of attachments even if not including all of those that were necessary.

3.8 Additional Observations

Q8 - *Are there any other observations not addressed in the above questions? [List other observations for each Project as applies].*

- **Critiques:** There were multiple observations made during this review that did not exactly fit within the specific review questions. However, some observations in this section repeated observations made in earlier review questions. Unique observations included things such as a PCR lacking a signature from the preparer. Additional observations noted a lack of clarity on who was responsible for maintaining a stormwater Underground Injection Control (UIC) facility and an apparent lack of QC done for either Notification or PCR for a project. Other observations were noted previously in this review such as not adhering to standard naming conventions, no initial QC reviews of PCR's or discrepancies identified in stormwater table totals.
- **Positives:** All the positive comments and observations made in this final section were largely repeats from those identified throughout the review such as detailed descriptions in summary sections and FAHP inspections as well as identifications of challenges encountered in construction and inclusion of appropriate attachments.

4.0 Summary of Findings and Recommendations

The quality assurance review of the 2023 - 2025 FAHP PCR submissions reveal several cross-cutting themes that require attention to improve the consistency and accuracy of future PCR submissions. While individual projects demonstrated quality in various aspects of the PCR content, issues were still prevalent across regions and projects.

4.1 Key Findings:

- Accuracy and Sufficiency of Project Information

  The most prevalent finding that came up during the QA review centered on the accuracy of information and data submitted in the completed PCR's as well as the overall general detail; or lack thereof, regarding project performance.

  In terms of accuracy, errors were found in the introductory sections regarding basic project information (permits, inspection dates, etc.) as well as in the 'stormwater' and 'habitat features' sections. One area worth highlighting was that there were several instances where reviewers noted discrepancies between the submitted FAHP Notification information compared to the PCR. Specifically, there were instances of unexplained differences in CIA when compared to the Notification, as well as confusing off-site treatment with on-site treatment.

  Regarding sufficient detail in PCR's, an important observation was that there were a couple of projects in the review that could have expanded upon detail in the project summary sections. In fact, one project had only a one sentence summary which is insufficient. In addition to sparse details, issues identified in inspection reports were not noted in the final PCR. Having these details included would have provided a more complete picture of how the project fared in construction.

- Documentation and Storage/Filing Process

  Some of the additional observations of the projects made by the reviewers focused a little more on process. A repeated issued identified on multiple projects was inconsistency of using standard naming conventions. This was observed for the PCR documents themselves as well as the project titles being inconsistent over multiple documents filed. Following standard naming conventions noted in Appendix 4 of the FAHP User's Guide not only helps with simple organization and tracking but also with the implementation of a QA review.

  Furthermore, there were issues with the proper filing of required documents in the shared FAHP folders needed to support the PCR's. Whether it was missing FAHP

Inspection reports, QC reviews or as-builts, there was a consistent theme across this review that necessary attachments were not found or overlooked. It is worth noting that it is hard for a QA reviewer to determine if as-builts are required if there is no documentation in the PCR identifying if the project deviated from relevant plan sheet designs.

Finally it was observed that other supporting documentation, though not explicitly required, would have been helpful to include to demonstrate aspects of the project being completed as planned; such as photos of stormwater treatment facilities or fish passage improvement elements.

- Adherence to Quality Control (QC Process)

  One of the most apparent issues across all projects was the lack of a properly executed QC process. Some projects did have one round of QC done for their submitted PCR that included an internal review either entirely by internal staff or between internal staff and the consultant preparing the document. None of the projects however had a round of QC review that included a final review by an ODOT-NOAA Liaison prior to concluding the project. As with the FAHP Notification form, the PCR should be reviewed by internal Region Environmental staff first (REC, Biologist or Environmental Manager) before an official QC by the ODOT-NOAA Liaison, using the QC Checklist. This review protocol is to verify all necessary information has been provided to verify compliance with the FAHP and document any relevant project changes. Executing a multilevel QC review would have likely resulted in a reduction of observed errors identified by the QA review team.

- Proficiency Across Projects

  While observations noted several areas where improvements can be made, it should be noted multiple projects still demonstrated proficiency in areas such as stormwater details as well as thorough descriptions in summarizing project performance. The positive examples represented a few projects in specific areas. The positives notwithstanding, the theme of multiple areas needing improvements for future PCR's remained across all projects.

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 the common deficiencies observed across projects and regions. This should include providing clear examples of what constitutes adequate detail in summarizing projects, what supporting documentation is needed, a reiteration of what data is required in each section, how to appropriately file and document PCR's and associated documents and clear explanation of the expected QC process.

Training should be offered internally to ODOT employees as well as externally for consultants. This future training course would be best delivered by the ODOT-NOAA Liaisons familiar with these requirements. Additionally, updated guidance, informed annually by these QA reviews, should also be disseminated internally and externally to address the identified issues. Guidance provided by email or other mass communications could effectively summarize issues to be addressed. If issues persist, formalized guidance documents can be developed and made available. When combined, training and guidance can improve consistency across the agency and among consultant partners.

This training could be done in short segments via Teams meetings internally with relevant ODOT environmental staff. The training could touch on individual elements of PCR preparation or could be a longer format that walks through the entire process. It is recommended that these training courses occur regularly to serve as refreshers as well.

Adherence to the standardized QC process:

One of the most obvious areas where improvements could be made would be for consistency across regions in following the standard two-round QC process for PCR's. As is the case for FAHP Notifications, the PCR's require two rounds of QC before finalization. None of the projects in the review executed the two rounds of QC and one had no QC review at all. In addition to the training mentioned previously it will be important to ensure individuals preparing the PCR's are familiar with and follow the Statewide ESA Documentation Quality Plan found on ODOT's website. This is an excellent resource for understanding the required QC process for ESA deliverables.

Improvements to documentation storage and filing:

A portion of the training mentioned earlier will touch on the proper documentation and filing procedures for PCR's. There were multiple observations in this QA review that there was a lack of adherence to standard naming conventions for naming files as well as changing project titles between ESA deliverables. This can create difficulty for organized project documentation as

well as making QA reviews challenging when there is lack of clarity on which documents to examine. Appropriately filing and including required supporting attachments for the filed PCR's further enhances organization and ease of QA review.

Future QA Reviews:

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

Future Completion Report QA reviews will continue to follow this review format. 'Cycling-in' new review team members from the different Regions within ODOT for each of the annual QA reviews will continue to be an integral part of the process. Different ODOT Biologists, Region Environmental Coordinators and/or Environmental Managers from different Regions can bring varying levels of experience and expertise that will help provide unique perspectives and drive objectivity in the review process.

Appendix A: QC Checklist for FAHP Completion Report

Oregon Department of Transportation

QC Checklist for FAHP Completion Report

Project Name:		Key Number:
QC Preparer[1] Name	QC Reviewer[1] Name	Date of Peer Review

[1] *QC Review should be completed by a qualified ODOT Biologist, REC or NOAA Liaison. Qualification includes more than 5 years of experience in reviewing state and federal ESA documents.*

Review Checklist

1. Are the fields in the completion report completed and accurate?	No	Yes	N/A
All permits are listed with the type and permit number	☐	☐	☐
Project Name and Key Number	☐	☐	☐
Biologist Contact Information	☐	☐	☐
HUC and IWWW Extension(s) correctly shown	☐	☐	☐
Comments			
2. Overall Performance and Summary	**No**	**Yes**	**N/A**
Inspection dates listed match inspection reports that were filed	☐	☐	☐
All performance items and general performance metrics are addressed	☐	☐	☐
Problems encountered and how/when they were solved is filled out	☐	☐	☐
The performance summary is completed and summarizes any issue	☐	☐	☐
Comments			
3. Habitat Features and Mitigation	**No**	**Yes**	**N/A**
The impacts shown on the completion report resemble the ones shown on the notification form or good justification is provided as to the differences	☐	☐	☐
All relevant fields are completed and they are explained adequately in the comments field if they are complex	☐	☐	☐
Comments			
4. Stormwater Section	**No**	**Yes**	**N/A**
Do the numbers on the main stormwater table add up correctly?	☐	☐	☐
If there are off-site BMPs, is the location shown properly?	☐	☐	☐
Are all the drainage areas accurately depicted with a DFI number assigned?	☐	☐	☐
Comments			
5. Attachments	**No**	**Yes**	**N/A**
Is there a map included with all of the stormwater drainage basins labeled and flow directions included?	☐	☐	☐
Are there as-builts or at least marked up plan sheets included?	☐	☐	☐
If this project included pile driving, is there an updated bridge supplement included?	☐	☐	☐
Comments			
Overall Reviewer Comments:			

Preparer Signature

Reviewer Signature

Form # 7345-262 (11/20)
Level 2 - Limited

http://www.oregon.gov/ODOT/GeoEnvironmental/pages/index.aspx
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