Quality Assurance/Quality Control (QA/QC) Plan

For Federal-aid Highway Projects









ADOT Environmental Planning





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INTRODUCTION

The Arizona Department of Transportation's (ADOT) vision is to be the standard of excellence for transportation systems and services. Environmental Planning (ENV – short-hand throughout this document) is committed to conducting quality environmental reviews and producing the highest quality environmental documents in compliance with the National Environmental Policy Act (NEPA) and all related environmental laws affecting transportation project development.

ENV has established this Quality Assurance/Quality Control Plan (QA/QC Plan) to ensure the overall quality and efficiency of the environmental review process. This QA/QC Plan describes Quality Assurance and Quality Control procedures and processes, QA/QC review documentation, document review procedures, quality document production guidance, and the staff responsible for performing activities and verifying compliance. Templates and tools for successfully implementing this QA/QC Plan are also included.

ENV project teams will implement this QA/QC Plan during the preparation and review of environmental documents to meet federal environmental review requirements. This QA/QC Plan is designed to provide directions to assist project teams in meeting these requirements. Provision of quality products and quality service are of utmost importance to ADOT and this QA/QC Plan will be used to help develop quality environmental reviews and documents in delivering ADOT and Local Public Agency (LPA) Federal-aid Highway Program (FAHP) projects.

Quality Assurance (QA)

Quality Assurance is a system for ensuring a desired level of quality control in the development, production, or delivery of products and services. ENV defines QA as preventing problems, process monitoring, and self-assessment activity on a "program level." QA is employed at the project level and the management level to ensure that prudent QC procedures and tools are in place and are being carried out with the desired quality compliant products provided. Within ENV the Standards and Training Manager is responsible for overseeing QA. QA includes having the procedures and support documentation in place to successfully conduct environmental document preparation and review. QA also includes self-monitoring through self-assessments as required by the CE and NEPA Assignment MOUs and as described elsewhere in this QA/QC Plan. As part of QA, individual projects and project files are periodically reviewed to ensure that project-specific quality control measures such as document checking and technical reviews are being completed. Through this process, QA provides feedback to those preparing documents and technical studies to ensure continuous improvement.

Quality Control (QC)

Quality Control is a system for verifying and maintaining a desired level of quality in technical analysis and documentation through the use of proper checking against standards and verification of products. ENV defines QC as the day-to-day effort of identifying and correcting deficiencies and errors and the documentation of those efforts. QC is routinely employed at the production or "project level."



CE ASSIGNMENT AND NEPA ASSIGNMENT

ADOT and the Federal Highway Administration (FHWA) have agreements in place with QA/QC procedure requirements to help deliver the FAHP. Consequently, this QA/QC Plan will assist ADOT in conforming to the stipulations of the FHWA-ADOT Memorandum of Understanding (MOU) for the *State Assumption of Responsibility for Categorical Exclusions* under 23 U.S.C 326 (CE Assignment) and the MOU between FHWA and ADOT for the *Surface Transportation Project Delivery Program* codified in 23 U.S.C. 327 (NEPA Assignment). This QA/QC Plan ensures that ADOT ENV staff implement the provisions of the MOUs and outlines ADOT approval authority for Categorical Exclusions (CE) listed under 23 CFR 771.117(c) and (d), individually documented CEs under 23 CFR 771.117(d), Environmental Assessments (EA)/Finding of No Significant Impact (FONSI), and Environmental Impact Statements (EIS)/Record of Decision (ROD). A Final EIS is abbreviated as FEIS.

Assignment of FHWA Environmental Review Responsibility

1.1.1 CE Assignment - State Assumption of Responsibility for Categorical Exclusions

Pursuant to 23 U.S.C. 326, FHWA and ADOT have entered into an agreement, the CE Assignment MOU. The MOU assigned to ADOT FHWA's environmental review responsibilities for determining whether certain projects are categorically excluded from the requirement to prepare EAs or EISs. All responsibilities concerning CE determinations not assigned under the CE Assignment MOU are assigned under the NEPA Assignment MOU. The CE Assignment MOU is renewable every three years.

1.1.2 NEPA Assignment - Surface Transportation Project Delivery Program

Pursuant to 23 U.S.C. 327, FHWA and ADOT have entered into an agreement, the NEPA Assignment MOU. The MOU assigned FHWA's environmental review responsibilities to ADOT including the preparation and approval of EAs and EISs as well as the preparation of CEs not assigned under the CE Assignment MOU. The NEPA Assignment MOU is renewable every five years.

Involvement with FHWA

Pursuant to these MOUs, FHWA cannot provide any project-level assistance to ADOT in carrying out any of the responsibilities assumed under CE Assignment and NEPA Assignment. Project-level assistance is defined as any advice, consultation, or document review associated with a particular highway project. However, FHWA may provide program-level assistance concerning interpretation of any applicable law contained in the United States Code, interpretation of any environmental review-related regulation, interpretation of FHWA policies or formal guidance.

For those projects excluded from NEPA Assignment where FHWA remains the Lead Federal Agency ADOT will coordinate with FHWA on environmental documentation review and approval.

Responsibilities

As a consequence of CE Assignment and NEPA Assignment, ADOT is liable for carrying out the USDOT Secretary's responsibilities it has assumed under Assignment, subject to the limitations of the Eleventh Amendment waiver of sovereign immunity by ADOT.

In assuming the USDOT Secretary's responsibilities under NEPA Assignment and other agreements, ADOT is subject to the same procedural and substantive requirements that apply to the USDOT Secretary in carrying out these responsibilities. Such procedural and substantive requirements include federal laws, federal regulations, Executive Orders, policy, guidance and interagency agreements such as programmatic



agreements, memoranda of understanding, memoranda of agreement, and other similar documents that relate to the environmental review process.

CE Assignment MOU Requirements

The CE Assignment MOU (326 MOU) established certain requirements related to FHWA oversight and reporting.

1.1.3 **CE Assignment**

ADOT ENV is committed to continuous improvement; therefore, performance regarding document quality and delivery is reviewed by supervisors and senior managers.

Certain performance monitoring and quality assurance activities are required by FHWA under stipulation IV.(F) of the 326 CE MOU. In conformance with these requirements, ADOT performs the following items:

- 1. Compile a list of CE determinations and Section 4(f) approvals of use that the state has approved every 6 months. This is to be completed by the ADOT NEPA Assignment Manager or designee and submitted to FHWA.
- Prepare a self-assessment report summarizing ENV performance under the 326 CE MOU. This is required 30 days prior to a FHWA scheduled monitoring review. This is to be completed by the ADOT ENV Standards and Training Manager or another delegate at the discretion of the ENV Administrator.
- Maintain electronic project records and general administrative records pertaining to the 326 CE MOU. FHWA may request these project file records which must be provided within five (5) business days. Project files are to be retained for a minimum of five (5) years from completion of project construction.

When monitoring CE quality, ENV will review CE quality by completing administrative file reviews. These reviews will be on a sample of CE projects chosen for review during a monitoring period. This review process will be conducted by the ENV Standards and Training Manager. Based on these reviews, action may be needed to improve QA/QC. Accordingly, the QA/QC Plan will be evaluated and updated, if needed, and ENV staff made aware of the assessment results, process improvements and any revisions made to this QA/QC Plan.

1.1.4 CE Assignment Monitoring Review and Self-Assessment

1.1.4.1 <u>CE Assignment – FHWA Monitoring</u>

FHWA will periodically review ADOT's records and performance under the 326 CE MOU. The CE MOU provides guidance on performance measures that FHWA will consider when evaluating ADOT's performance in the CE Assignment Program.

1.1.4.2 CE Assignment – Self-Assessment Report

The 326 MOU self-assessment report has the below outline:

- 1. Introduction
- 2. Performance Measures



1.1.4.3 CE Assignment - Performance Measures

To evaluate the success of assignment under the 326 MOU, ADOT established a set of performance measures against which ADOT is evaluated in administering the assigned environmental review responsibilities. ADOT collects and maintains the necessary and appropriate data related to meeting the performance measures and monitors progress toward meeting the performance measures. ADOT reports the results to the FHWA in a Self-Assessment prepared in advance of a monitoring review. The performance measures contained in the 326 MOU are outlined below. See Table 1 for performance measure details.

A. <u>Compliance with NEPA, FHWA NEPA regulations, and other Federal environmental statutes and regulations:</u>

Maintain documented compliance with requirements of all applicable Federal statutes and regulations for which responsibility is assumed (e.g., NEPA, Section 4(f), Section 106 of the NHPA and Section 7 of the ESA).

B. QA/QC for NEPA decisions:

Compliance with ADOT's QA/QC.

C. Relationships with the general public, agencies and Tribes:

Maintain effective relationships with agencies and Tribes, including regularly occurring coordination meetings and solicitation of feedback.

D. Increased efficiency and timeliness in completion of NEPA process:

Compare time of completion of CE approvals for the reporting period over the running average time of CE completion under NEPA Assignment.

1.1.4.4 CE Assignment Performance Measures Implementation

The Standards and Training Manager will complete the 326 CE Administrative File Review Checklists which account for the recording of performance measures data to be used in the calculations outlined above. The data and calculations from the Administrative File Review Checklists are recorded in an Excel spreadsheet with tabs for each performance measure metric. These measures are then packaged in the Self-Assessment.



<u>Table 1 – 326 Performance Measures</u>

Performance Measure	Performance Measure	Tools	Accounting	Metric Goal
A. Compliance with NEPA, FHWA NEPA regulations, and other Federal environmental statutes and regulations	Maintain documented compliance with requirements of all applicable Federal statutes and regulations for which responsibility is assumed (e.g., NEPA, Section 106 of the NHPA, Section 7 of the ESA).	Administrative File Review Forms. Excel spreadsheet tabulation.	CEs that have approvals for NEPA and all supporting technical documentation and approvals for other applicable laws in the project file supporting analysis for NEPA. This is a percentage obtained by number of projects with signed CE determinations and with supporting technical reports and approvals for Section 4(f), Section 106 and Section 7, as applicable, divided by the total number of projects approved. This will be based on a sample of projects depending on the number of CEs approved.	Goal 100%
B. QA/QC for NEPA decisions	Maintain and apply internal quality control and assurance measures and processes, including a record of compliance with FHWA's and ADOT's environmental document content standards and procedures, including those related to QA/QC.	Administrative File Review Forms. Excel spreadsheet tabulation.	Percent of CEs with a CE Quality Control Checklist in the project file. Percentage is obtained by total number of projects with documented quality control in the project file divided by total number of projects requiring these documents.	Goal 100%



Performance Measure	Performance Measure	Tools	Accounting	Metric Goal
C. Relationships with agencies and Tribes	Maintain effective relationships with agencies including regularly occurring coordination meetings and solicitation of feedback.	Agency Liaison Summary Report.	Agency outreach summaries are included in self- assessments. Qualitative measure.	Achieve a level of Satisfactory
	Maintain effective relationships with Tribes, including regularly occurring coordination meetings and solicitation of feedback.	Tribal Liaison Summary Report.	Tribal outreach summaries are included in self- assessments. Qualitative measure.	Achieve a level of Satisfactory
D. Increased efficiency and timeliness in completion of NEPA process	Compare time of completion of CEs in reporting period vs. assignment average under this MOU.	326 Project Tracking for completion times. Excel spreadsheet tabulation.	Compare CE delivery production time to historical average since the start of CE assignment.	The goal is to complete CEs in less than the historical average time before the MOU and to continue to exceed a running average under the MOU.



1.1.4.5 FHWA Monitoring Review Coordination

The NEPA Assignment Manager or designee, working in cooperation with the FHWA Arizona Division, is responsible for the arranging access to necessary information and for ensuring employees are available for FHWA interviews or answering questions. FHWA monitoring coordination requires meeting the following responsibilities:

- 1. Establish a general schedule in coordination with the FHWA Arizona Division
- 2. Facilitate monitoring review communication with ENV management, technical teams, and other ADOT operational staff and management
- 3. Plan for the monitoring review including coordination of file transfers for remote electronic reviews
- 4. Coordinate the monitoring review visit with FHWA and secure meeting rooms
- 5. Ensure the availability of personnel during the monitoring review visit
- 6. Facilitate the monitoring report review of the draft report and acceptance of the final report

NEPA Assignment MOU Requirements

The NEPA Assignment MOU (327 MOU) established certain requirements related to FHWA oversight and reporting.

1.1.5 **NEPA Assignment**

FHWA will periodically review ADOT's records and performance under the 327 MOU in conformance with stipulation 8.2. of the 327 MOU. The following are specific record keeping requirements worth emphasizing from the 327 MOU. ADOT shall perform regular QA/QC activities to determine if its process is working as intended. If any process areas are identified as needing improvement, ADOT will take appropriate and timely corrective actions to address such areas.

ADOT will maintain a list of approved individually documented CEs, EAs, EISs and Section 4(f) determinations.

1.1.6 NEPA Assignment Monitoring Review and Self-Assessment

1.1.6.1 NEPA Assignment - FHWA Monitoring

The NEPA Assignment Manager, working in cooperation with the FHWA Arizona Division, is responsible for arranging access to necessary information at the request of FHWA. FHWA monitoring review coordination requires ADOT meeting the following responsibilities:

- Coordinate with FHWA to schedule monitoring activities
- 2. Facilitate monitoring review planning communication with ENV management, technical teams, and other ADOT operational staff and management
- 3. Plan for the monitoring review, including review of FHWA pre-monitoring review questions, and coordination and scheduling of remote electronic reviews
- 4. Coordinate the monitoring review visit with FHWA
- 5. Ensure the availability of files following the **327 MOU Administrative Folders Outline** which is included in the appendix
- 6. Help to arrange for interviews with ADOT personnel during the monitoring review visit
- 7. Review the draft monitoring review report and coordinate with FHWA for the final monitoring review report posting in the Federal Register



1.1.6.2 NEPA Assignment - Self-Assessment Report

The 327 MOU self-assessment report has the general outline below that may be modified based on individual reporting needs:

- 1. Introduction
- 2. Performance Measures

1.1.6.3 NEPA Assignment - Performance Measures

To evaluate the success of assignment under the 327 MOU, ADOT established a set of performance measures against which ADOT is evaluated in administering the assigned environmental review responsibilities. ADOT collects and maintains the necessary and appropriate data related to meeting the performance measures and monitors progress toward meeting the performance measures. ADOT reports the results to the FHWA in a Self-Assessment prepared in advance of a monitoring review. The performance measures contained in the 327 MOU are outlined below. *The bold italicized text and the numbering format match the 327 MOU text*. See Table 2 for performance measure details.

A. <u>Compliance with NEPA, FHWA NEPA regulations, and other Federal environmental statutes and</u> regulations:

Maintain documented compliance with requirements of all applicable Federal statutes and regulations for which responsibility is assumed (e.g., NEPA, Section 106 of the NHPA, Section 7 of the ESA, etc.).

B. **QA/QC for NEPA decisions:**

Maintain and apply internal quality control and assurance measures and processes, including a record of compliance with FHWA's and ADOT's environmental document content standards and procedures, including those related to QA/QC.

C. Relationships with the general public, agencies and Tribes:

Ensure meaningful public engagement

Maintain effective relationships with agencies including regularly occurring coordination meetings and solicitation of feedback.

Maintain effective relationships with Tribes including regularly occurring coordination meetings and solicitation of feedback.

D. <u>Increased efficiency and timeliness in completion of NEPA process:</u>

Compare time of completion of Individual CEs in reporting period vs. assignment average and EA approvals before and after assumption of responsibilities under this MOU.



1.1.6.4 <u>NEPA Assignment Performance Measures Implementation</u>

The Standards and Training Manager will complete the Administrative File Review Checklists which account for the recording of performance measures data to be used in the calculations outlined above. The data and calculations from the Administrative File Review Checklists are recorded in an Excel spreadsheet with tabs for each performance measure metric. These measures are then packaged in a Self-Assessment.



Table 2 – 327 Performance Measures

Performance Measure	Performance Measure	Tools	Accounting	Metric Goal
A. Compliance with NEPA, FHWA NEPA regulations, and other Federal environmental statutes and regulations	Maintain documented compliance with requirements of all applicable Federal statutes and regulations for which responsibility is assumed (e.g., NEPA, Section 106 of the NHPA, Section 7 of the ESA, etc.).	Administrative File Review Forms. Excel spreadsheet tabulation.	Environmental documents that have approvals for NEPA and all supporting technical documentation and approvals for other applicable laws in the project file supporting analysis for NEPA. Percentage obtained by number of projects with signed NEPA determinations (ICE/FONSI/ROD) and with supporting technical reports and approvals for Section 4(f), Section 7, Section 106, Clean Air Act, 23 CFR 772 - Noise regulations, as applicable, divided by the total number of projects approved.	Goal 100%
B. QA/QC for NEPA decisions	Maintain and apply internal quality control and assurance measures and processes, including a record of compliance with FHWA's and ADOT's environmental document content standards and procedures, including those related to QA/QC.	Administrative File Review Forms. Excel spreadsheet tabulation.	Percent of individually documented CEs with a CE Quality Control Checklist and the percent of EA/EISs with the draft and final environmental documents with a completed EA/EIS Quality Control Checklist and approved final environmental documents with completed ICE/EA/EIS Quality Control Form in the project file. Percentage is obtained by total number of projects with documented quality in the project file divided by total number of projects requiring these documents.	Goal 100%



Performance Measure	Performance Measure	Tools	Accounting	Metric Goal
C. Relationships with the general public, agencies and Tribes	Ensure meaningful public engagement	Project Public Involvement Plans, Project Summary Reports and Excel spreadsheet tabulation.	All ICE/EA/EIS projects for which a Project Public Involvement Plan is required per the ADOT Public Involvement Plan have one that was fully implemented. Project Percentage is obtained by number of projects that followed the ADOT Public Involvement Plan.	Goal 100%
	Maintain effective relationships with agencies including regularly occurring coordination meetings and solicitation of feedback.	Agency Liaison Summary Report.	Agency outreach summaries are included in self-assessments. Qualitative measure.	Achieve a leve of Satisfactory
	Maintain effective relationships with Tribes, including regularly occurring coordination meetings and solicitation of feedback.	Tribal Liaison Summary Report.	Tribal outreach summaries are included in self-assessments. Qualitative measure.	Achieve a leve of Satisfactory



Performance Measure	Performance Measure	Tools	Accounting	Metric Goal
D. Increased efficiency and timeliness in completion of NEPA process	Compare time of completion of Individual CEs in reporting period vs. historical average and a running average under the MOU.	327 Project Tracking for completion times. Excel spreadsheet tabulation.	Percentage is obtained per project by total number of months to complete ICE approvals divided by the average total number of months to complete ICE approvals before NEPA assignment and the average for the period divided by a running average of all CEs completed under the MOU.	The goal is to complete CEs in less than the historical average time before the MOU and to continue to exceed a running average under the MOU
	Compare time of completion of EA approvals before and after assumption of responsibilities under the MOU.	327 Project Tracking for completion times. Excel spreadsheet tabulation.	Percentage is obtained per project by total number of months to complete EA approvals divided by the average total number of months to complete EA approvals before NEPA assignment and the average for the period divided by a running average of all EAs completed under the MOU.	The goal is to complete EAs in less than the historical average time before the MOI and to continue to exceed a running averag under the MOI.



QUALITY DOCUMENTS

Terminology

1.1.7 Environmental Document

Environmental document is defined in 42 U.S.C. 4336e as an environmental impact statement, an environmental assessment or a finding of no significant impact. 23 CFR 771 defines environmental document as "EAs and EISs" and CEs as a "designation."

1.1.8 **NEPA Document(s)**

Historically in 23 CFR 771 "NEPA documents" referred to EAs and EISs. Though historically referring to EAs and EISs, for convenience and ease of use by staff, ADOT defines "NEPA document" or "NEPA documentation" to mean listed CE, individually documented CE (ICE), EA/FONSI and EIS/ROD.

1.1.9 Environmental Review Document(s)

23 CFR 771 includes the term "environmental review document" which is used synonymously with "environmental document." ADOT defines environmental review document(s) to mean any documents prepared as part of the environmental review process including technical reports, NEPA documentation and Section 4(f) evaluations.

Documentation Review

As the Lead Federal Agency under CE and NEPA Assignment, ADOT is responsible for coordination, review and approval of environmental review documents. CEs are prepared for the vast majority of projects. EAs and EISs are completed less frequently and have comprehensive procedures that must be followed. The procedures outlined in this section of the QA/QC Plan ensure consistent review of environmental review documents. The detailed guidance for how to prepare environmental review documents resides elsewhere in specific environmental technical analysis and environmental document preparation guidelines.

1.1.10 Documentation Resources

There are a multitude of resources on the <u>ADOT Environmental Planning</u> website to support environmental review documents including the; *Categorical Exclusions (CE) Manual, EA/EIS Guidance, Section 4(f) Manual*, etc. as well as guidance in the various technical areas.

1.1.11 Document Readability

Documents prepared or approved by ENV can be made available to the public (exceptions include documents with confidential cultural resources information). All documents should be written clearly and concisely with accurate information. Documents should be written in plain English. Technical documents may contain highly technical terms and wording, for example, the biology document will identify scientific names of plant and animal species. Environmental documents should contain summary and conclusions from technical reports. Acronyms should be spelled out with the first use. Documents should be written using correct grammar, content, and spelling. Consultant and internally written documents are reviewed for quality and consistency.



The environmental document preparer should strive to follow the requirements of 42 U.S.C. 4336a regarding page limits. Environmental documents should include only enough information from the technical reports to provide a basis for how a decision was made. CE Checklists are also prepared with streamlining goals in mind with technical information and consultations prepared separately and residing in the project file.

Environmental documents should be written clearly, concisely and based on facts, not opinion. In short, the environmental documents should 1) tell the story, 2) keep it brief, and 3) comply with the regulations.

Document review and approval procedures are outlined under Chapter 4 - Documentation Review and Approval.

Types of NEPA Documentation

1.1.12 <u>Categorical Exclusions</u>

A CE is an action that, based on FHWA's past experience, normally does not involve significant environmental impact and therefore does not require the preparation of an EA or EIS. CEs are documented and approved using the CE Checklist which was developed in conformance with 23 CFR. 771. The detailed guidance for preparing CE Checklists is outlined in ADOT ENV's *Categorical Exclusions (CE) Manual*. The "listed CEs" are prepared and approved by ADOT under the CE Assignment MOU. Individually documented and approved CEs are approved by ADOT under the NEPA Assignment MOU. Approval of the CE Checklist by the ENV Administrator or designee documents completion of NEPA requirements for a federal action. NEPA approval is needed for federal actions (FHWA authorizations) that include federal funding for design, right-of-way and construction as well as administrative approvals such as a Change in Access of the Interstate and approval of design exceptions on the National Highway System.

1.1.13 Environmental Assessments

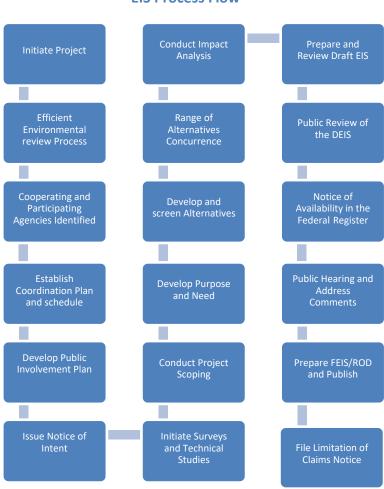
An EA may be prepared for an action that does not involve significant impacts but does not qualify for a CE. EAs are normally prepared with the expectation that the project will qualify for a FONSI after the appropriate environmental analysis and public review and comment. The guidance for preparing an EA is outlined in the ADOT *EA/EIS Guidance*. EAs are not required to follow the Efficient Environmental Review process (23 U.S.C. 139); however, agency and public scoping are conducted for ADOT EAs.

The public review period for an EA is 30 days unless the EA incorporates an individual Section 4(f) evaluation in which case the Department of Interior (DOI) is given 45 days for review of the document. The draft EA must be available for public review for 30 days and made available 15 days before a public hearing. The Environmental Planner, Project Manager and ADOT Communications Public Information Officer must plan for a public hearing in conformance with the ADOT Public Involvement Plan (PIP). There should be an understanding of the date the EA will be ready for public review and project team agreement on a public hearing date before a date is committed to. No Federal Register notice is required for an EA though coordination with ADOT Communications is required to provide a public notice.



1.1.14 Environmental Impact Statements

An EIS is prepared for an action that is expected to have significant impacts on the environment. The guidance for preparing an EIS is outlined in the ADOT *EA/EIS Guidance*. An EIS is required to follow the Efficient Environmental Review process outlined in 23 U.S.C. 139. Though initiated in sequence there are many steps in the process that will overlap and be conducted in parallel with other steps in the process. The *General* EIS process is depicted as follows:



EIS Process Flow

The general steps depicted above are a precursor to the document review steps outlined in this QA/QC Plan. Detailed project development and environmental review documents steps are defined elsewhere.

1.1.14.1 Prior Concurrence

Prior concurrence reviews are put in place for FHWA Headquarters reviews of FHWA Division decisions for projects that are highly controversial or involve issues of national policy or program significance. With ADOT ENV's centralized structure this exact model cannot be emulated because EISs are not approved at a "District level" which would be equivalent to an FHWA "Division level" if ADOT decision making was decentralized. Regardless, concurrent reviews could be required on occasion that mirror 23 CFR 771.125(c). ADOT Multimodal Planning Division Director has been selected to conduct any prior



concurrence reviews. MPD would review the Draft EIS concurrently with the Project Delivery Manager or NEPA Assignment Manager and legal pre-review. MPD would also review the FEIS concurrently with the Manager and Legal Sufficiency Review. See FHWA's <u>Guidance on FHWA Prior Concurrence Procedures for EISs</u> for more information.

1.1.14.2 EIS Submittal to U.S. EPA

ADOT is required to submit all EISs, together with comments and responses, to the U.S. Environmental Protection Agency (EPA) in California – Region 9. The EPA will prepare a <u>Notice of Availability</u> for publication in the Federal Register. All <u>submissions to EPA</u> must be made <u>electronically</u> to the EPA. ADOT has designated staff with access to the e-NEPA system for document submittals. In addition to the e-NEPA submission, the Environmental Planner will coordinate with the EPA Region 9 Office to determine the number of hard copies to submit.

1.1.14.3 Federal Register Notices

ADOT does not have the authority to submit documents directly to the Federal Register such as the Notice of Intent under 23 CFR 771.123(a) and Notice of Final Agency Action under 23 USC 139(I). ADOT must transmit these documents to FHWA's Arizona Division Office, and the FHWA will then submit these to the Federal Register on behalf of ADOT. FHWA is required to submit these documents to the Federal Register in a timely manner upon receipt from ADOT.

For an EIS ADOT must transmit the Draft, Final, or Supplemental EIS to the EPA. EPA will then prepare the Notice of Availability for publication in the Federal Register.

1.1.14.4 Limitations on Claims

Under 23 CFR 771.139 ADOT can issue a limitation on claims notice in the Federal Register that reduces the statute of limitations for challenging a federal agency decision for a project from 6 years to 150 days. ADOT will make use of the 150-day statute of limitations for those projects as deemed necessary by the Environmental Planning Administrator. The NEPA Assignment Manager is responsible for coordinating the placement of the notice in the Federal Register with the FHWA Arizona Division.

Administrative Record

For all projects the project folder in the ENV-Drive will serve as the repository of documentation that would be used to create an administrative record if needed. If a legal challenge is filed, ENV will verify (with the advice of legal counsel) that decisional documents from the Project File be made part of an administrative record. The Environmental Planner and Technical Specialists are responsible for maintaining the project files that would support an administrative record.

For an EIS, an Administrative Record organizational framework is created at the start of the project. For an EA the project file will serve as the basis for an Administrative Record. The regular project file may contain drafts and final documents, various communications, public outreach materials, etc. The Administrative Record will contain project final documents, and those documents memorializing process and decision related records.

The Administrative Record will be needed if the State is sued for a project environmental decision. The Administrative Record is what the Court will use in deciding any lawsuits filed. The Arizona Attorney General's Office (AGO) may specify additional documentation to be included in the administrative record.



Some projects can take many years to complete and staff may change on the project over time. This is why it is important to document decisions throughout the project development process.

Creation of the administrative record should be discussed early in the process when beginning the scope of the work for an EIS 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" and the FHWA online Toolkit. Though a consultant may set up and maintain an administrative record the Environmental Planner is the responsible person for the Administrative Record.

USDOT Permitting Dashboard

The Permitting Dashboard is an online tool for Federal agencies, project developers, and interested members of the public to track the Federal government's environmental review and authorization processes for large or complex infrastructure projects, part of a government-wide effort to improve coordination, transparency, and accountability.

Under NEPA Assignment, ADOT is responsible for updating projects on the Dashboard. ADOT standard work for populating and updating the Dashboard is outlined in the appendix of this QA/QC Plan. The NEPA Assignment Manger ensures that the Dashboard is maintained. The Dashboard is maintained for EA and EIS projects only.



DOCUMENTATION REVIEW AND APPROVAL

QA/QC of Letters

All agency letters for projects that fall under the CE and NEPA Assignment MOUs are reviewed for quality, substance and suitability. Contact information should be verified before letters are sent.

The following letters should be reviewed as follows:

- Cooperating and Participating agency letters are reviewed by a Senior Planner.
 - The Wetland Biologist also reviews letter sent to the Corps. The Biologist reviews cooperating agency letters sent to the USFWS. Other technical areas review letters to other agencies as needed.
- Section 106 consultation letters are reviewed by the HPT Team Lead or Cultural Resources Program Manager
- Section 7 consultation letters are reviewed by the Biology Team Lead or Biology Program Manager

If an Environmental Planner or technical specialist prepares scoping or agency letters a peer review by another Planner or supervisor is recommended. The Environmental Planner or technical specialist performs this review if letters are prepared by an environmental consultant. Contact lists should be verified by the consultant. For projects involving Tribal scoping, the ENV Planning Tribal Liaison maintains an updated contact list and contact protocol.

Environmental Review Documents

Document review and approval procedures are described below.

1.1.15 <u>Technical Document Review</u>

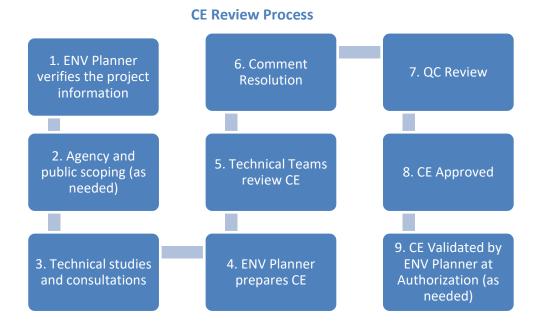
All project technical documents submitted by consultants or local agencies are to be reviewed by the assigned Technical Specialists. Prior to final approval, all biology documents prepared by ADOT biology staff will be reviewed by another ENV Staff member. Reviews should verify all project information is correct and the scope of work is consistent with all NEPA documents.

After the first submittal of a technical report there should be a meeting or phone conversation between the Technical Specialist and the consultant to discuss any unresolved comments or questions on the technical reports. No more than two report review submittals are expected. If the Technical Specialist needs assistance from their supervisor, they may request their supervisor also review the document.

If consultants have submitted technical documents to the Technical Specialists directly, the Environmental Planner should be notified of the submittal by the Technical Specialist and be included in comment responses and resolution.

1.1.16 Review and Approval of CEs

Environmental Planner is responsible for overseeing the completion of CE Checklists for all projects. CEs are developed in accordance with the requirements outlined in ADOT ENV's Categorical Exclusions (CE) Manual. ADOT CE and ADOT CE Checklist are synonymous since the approval is included with the Checklist. Environmental commitments are also prepared and ultimately included in the Environmental Permits Issues and Commitments (EPIC) that is included with the plan set for ADOT design/bid/build projects



1.1.16.1 <u>CE Review and Approval Process</u>

The following steps are conducted for CE review and approval:

- 1. Environmental Planner verifies the project scope of work/project description/limits and confirms programming data as applicable
- 2. Environmental Planner conducts environmental scoping with agencies and public (as outlined in CE Scoping Guidelines)
 - Scoping letters sent by email
 - Additional public scoping (as needed)
- 3. Technical Teams conduct technical studies and consultations as required
 - Technical determinations, and any project specific mitigation measures, are provided to the Environmental Planner for documenting in the CE and the EPIC sheet
- 4. Environmental Planner prepares the CE, environmental commitments and the EPIC sheet
- 5. Technical Teams review CE
 - Technical specialists review any relevant technical area documented in a CE as well as any mitigation measures included in the EPIC to ensure consistency with technical documents and consultation.

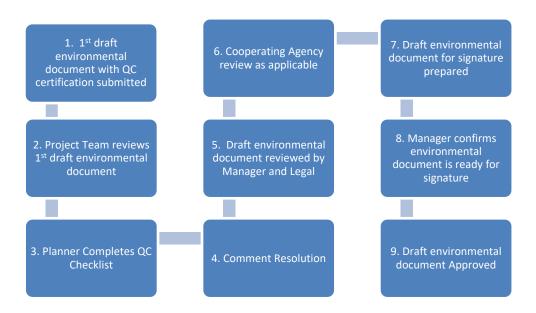


- 6. Comment resolution (as needed).
 - Environmental Planner ensures that technical comments are addressed and ensures copies of any substantive technical review comments are placed in the Project File
- 7. Environmental Planner provides the CE to a Senior Planner/peer reviewer for a QC review. The reviewer completes the **CE Quality Control Checklist** and provides a copy with any comments on the CE to the Environmental Planner. The *Guidance on Quality Control (QC) Reviews of CEs* can be used by the reviewer as a review aid. A copy of the QC checklist is placed in the project file.
 - A QC Quality Control Checklist is not required for a (c)(1) CE or (c)(9) [for immediate repair] CE.
 - The Environmental Planner prepares the final CE for signature and sends it to the approver.
 - Environmental Planner prepares an Individual CE Quality Control Form for any individually documented CE prepared under 23 CFR 771.117(d). The NEPA Assignment Manager or Project Delivery Manager certifies that the CE is ready for approval. This form is only for CEs completed under the NEPA Assignment MOU.
- 8. ENV Administrator or designee (NEPA Assignment Manager, Project Delivery Manager or Environmental Programs Manager) approves the CE. If a delegate approves the CE, then a different manager signs the QC Form for the Individual CE.
 - The CE Approver verifies the CE determination (type of CE selected) made by the preparer of the CE is appropriate for the described action
- 9. The Environmental Planner validates the CE at the time of the request for federal authorization. There should be no additional review required at this stage of the process. The following statement is contained in the validation letter:
 - "ADOT certifies that NEPA requirements consistent with the scope of work of the project have been met and the project incorporates all environmental commitments per 23 CFR 771.109(d)."
 - Note; a CE re-evaluation, which may need time for additional technical evaluation, must be identified, discussed with the project team and approved <u>prior</u> to this final step of validating a CE at the time of the request for FHWA authorization.

1.1.17 Review and Approval of EAs and EISs

The assigned Environmental Planner is responsible for overseeing the completion of EAs and EISs. EAs and EISs are developed in accordance with the requirements outlined in the ADOT ENV's EA/EIS Guidance and other environmental technical guidance.

Draft EA/EIS Review Process



Note: "EA/EIS Quality Control Checklist" referenced in this section of the Plan indicates either the "EA Quality Control Checklist" or the "EIS Quality Control Checklist" as appropriate. The "EA/EIS Quality Control Form" referenced in this section of the Plan indicates either the "EA Quality Control Form" or the "EIS Quality Control Form" as appropriate.

1.1.17.1 Review and Approval of Draft EA and Draft EIS

- 1. The initial draft environmental document is submitted by the consultant to the Environmental Planner (or the ADOT Project Manager if so arranged)
 - a. Environmental Planner ensures that the preceding technical reports that support project decisions are completed
 - Environmental Planner documents in the EA/EIS Quality Control Form that the consultant has included a QC statement in the submittal of the draft environmental document including the names of reviewers
 - Working drafts of documents or sections of documents may be reviewed prior to receiving the 1st draft environmental document with the consultant's QC certification



- Environmental Planner (or Project Manager) distributes the initial draft environmental document
 to the appropriate members of the project team including the Project Manager (Environmental
 Planner), ADOT CRO, Communications, District and the Technical Specialists for their concurrent
 review. A comment resolution form/matrix is typically utilized to resolve comments for working
 drafts for EA/EIS projects.
 - a. The Environmental Planner includes a review due date in the distribution email. Review timeframes are specified in the *Environmental Planning Review Timeframe Guidelines* in the ADOT ENV Project Development Procedures
 - Depending on project complexity the Environmental Planner may also provide a copy of the first submittal document to their supervisor or to a peer for a concurrent review (not mandatory)
 - c. Only one submittal for review and comment by the project team is expected. Complex projects may require an additional draft(s) or sections of the draft for review and comment before the NEPA Assignment Manager or Project Delivery Manager and legal pre-review.

3. QC Review

- a. The Environmental Planner completes the EA/EIS Quality Control Checklist
- b. The Environmental Planner documents in the **EA/EIS Quality Control Form** that the Technical Specialists and any other reviews as needed have been completed

4. Comment Resolution completed

- a. A comment resolution meeting is held to ensure critical comments in need of formal discussion and resolution will be adequately addressed. This resolution can also take place by email confirmation if there are no major issues that need discussion.
- b. The revised draft submittal goes back to the Technical Specialist or others if the comments were highly technical within the specific discipline, difficult in nature, or if requested by the reviewer
- 5. Draft environmental document is sent to the NEPA Assignment Manager or Project Delivery Manager and the AGO for legal pre-review
 - a. A legal pre-review for an EA is optional. A legal pre-review for a draft EIS is required by ADOT (not a federal regulatory requirement)
 - b. A second project team review may be necessary depending on the quality of the first submittal and the successful resolution of all first review comments
 - c. Comment Resolution for NEPA Assignment Manager or Project Delivery Manager and legal comments completed
- 6. Cooperating Agency review (as needed or agreed upon in a Coordination Plan if applicable)



- a. A comment resolution form/matrix is typically used to resolve agency comments
- 7. Draft environmental document ready for approval
 - a. Environmental Planner ensures the NEPA Assignment Manager/Project Delivery Manager, legal pre-review and Cooperating Agency (if applicable) comments are addressed
- 8. The NEPA Assignment Manager or Project Delivery Manager documents the **EA/EIS Quality Control Form** acknowledging that the QC review, technical reviews, and legal pre-reviews (if required) have been conducted and that the draft document is ready for approval by the ENV Administrator
- 9. Approval of the draft environmental document for Public Review
 - a. The NEPA Assignment Manager or the Project Delivery Manager can approve a draft EA in the absence of the ENV Administrator. The approver must be different than the one who signs the **EA/EIS Quality Control Form**
 - b. The State Engineer's Office approves a Draft EIS in the absence of the ENV Administrator

1.1.17.2 Review and Approval of Final EA/FONSI and Final EIS/ROD

The Environmental Planner is responsible for overseeing the review and approval of final EAs and final EIS/RODs.

- 1. In cooperation with ADOT Communications and the Project Manager ensure that all public and agency comments and responses to substantive comments are accounted for and addressed
 - a. The approach strategy to respond to the comments should be agreed-upon by the project team. This strategy would include responding to all comments vs. grouping comments with generalized responses.
 - b. Comment resolution is conducted, in cooperation with agencies as needed, for any outstanding comments or issues
- 2. The Environmental Planner and project team review the draft final environmental document and resolve any additional comments as needed
- Environmental Planner provides the draft final environmental document to the NEPA Assignment Manager or Project Delivery Manager and the AGO for QC and legal sufficiency review (required for an EIS)
 - a. A legal sufficiency review may be conducted for an EA but there is no federal legal sufficiency requirement. The final EA must be sent for legal sufficiency review if it contains a Section 4(f) evaluation that does not utilize one of the programmatic evaluations or is a *de minimis* impact.



- 4. The NEPA Assignment or Project Delivery Manager's review comments and any legal sufficiency review comments are sent to the consultant for incorporation into the final environmental document
- The Environmental Planner ensures the NEPA Assignment Manager or Project Delivery Manager and legal sufficiency review comments are addressed
 - a. A revised draft final environmental document is sent to the AGO (if necessary). Individual sections or pages reflecting comment resolution may be sent in lieu of the full document if acceptable to the AGO.
 - b. A statement of legal sufficiency from the AGO for an EIS, or an individual Section 4(f) determination if included with an EA, must be included in the project file
 - c. Legal sufficiency review procedures are outlined in Section 4.3
- 6. The NEPA Assignment Manager or Project Delivery Manager completes the **EA/EIS Quality Control Form** acknowledging that the QC and a legal sufficiency review have been conducted and that the document is ready for approval
- 7. The ENV Administrator approves the Final EA/FONSI or FEIS/ROD*
 - a. The NEPA Assignment Manager or the Project Delivery Manager can approve an EA/FONSI in the absence of the ENV Administrator. The approver must be different than the one who signs the EA/EIS Quality Control Form
 - b. State Engineer's Office approves a FEIS/ROD in the absence of the ENV Administrator
 - c. *A separate FEIS and ROD would both follow Steps 3 through 5 concurrently as separate documents

1.1.17.3 Review and Approval of EA/EIS Re-Evaluation

The Environmental Planner is responsible for overseeing the review and approval of formal EA/EIS reevaluations

- 1. Formal re-evaluations of an EA/EIS follow QC review steps similar to those outlined under Section 4.2.3.1
 - a. The level of review depends on the complexity of the re-evaluation
- The NEPA Assignment Manager or Project Delivery Manager completes the EA/EIS Re-Evaluation
 Quality Control Form acknowledging that the QC review has been conducted and that the
 document is ready for approval



Legal Sufficiency

The legal sufficiency review of an environmental document is an important step in ADOT's overall project development process. The following procedures instruct ENV staff in the preparation of project files for a legal sufficiency review of a FEIS or a final Section 4(f) evaluation prior to signature approval by the responsible authority. In other words, all relevant project and environmental files are complete in final form except for an approval signature on the EIS or individual Section 4(f) at the time of legal sufficiency review.

Legal sufficiency reviews are conducted by the AGO or by specialized outside environmental legal counsel appointed by AGO and funded by ADOT. When conducting a legal sufficiency review, the attorney will assess the document from the perspective of legal standards, litigation risk and legal defensibility. The assessment will consider whether the document was properly developed and whether it answers substantive questions which could be raised. This assessment will focus on the adequacy of the essential NEPA and/or Section 4(f) elements. Are the decision elements suitably supported? This review will also document any significant readability concerns of legal import.

Adherence to the procedures and recordkeeping outlined in this section of the QA/QC Plan shall constitute evidence of the adequacy of the legal sufficiency determination made by counsel.

Legal sufficiency review requests will be made by the Environmental Planner and accompanied by the following documents:

- 1. A transmittal memo signed by the Environmental Planner requesting a legal sufficiency review
- 2. A paper copy of the document to be reviewed
- 3. An electronic copy of the document in MS Word format with track changes enabled
- 4. An electronic copy of each technical study in .pdf format
- 5. A copy of the EA/EIS Quality Control Checklist

1.1.18 Environmental Document File Preparation Requirements and Considerations

- 1. Purpose and Need Statement
- 2. Discussion of Alternatives
- 3. Scope of review of environmental resources and any significant impact to, and mitigation for, those resources (e.g., air, water, vegetation, Section 7, cultural resources, etc.)
- 4. Coordination with local, tribal, and resources agencies, and documented responses to concerns raised
- 5. Availability for public review and comment, and adequacy of responses to those comments; and
- 6. Whether all applicable requirements have been satisfied (including laws, regulations, executive orders, FHWA policies, and ADOT guidance.)

1.1.19 Individual Section 4(f) File Preparation Requirements and Considerations

- 1. Section 4(f) applicability determination
- 2. How is the Section 4(f) document presented in the file-stand alone or included in an EA
 - a. An EIS legal sufficiency review could include a Section 4(f) Evaluation
- 3. Alternatives Analysis using Feasible and Prudent Standard including avoidance and least harm analysis (if required)
- 4. Identification and discussion of minimization and/or mitigation measures
- 5. Consultation and coordination with agency owning or administering the Section 4(f) resource; FHWA if a constructive use determination, Department of Interior, Housing and Urban Development and US Department of Agriculture



6. Section 4(f) conclusion and determination

Upon submission from ADOT, the reviewing attorney shall ensure receipt of all documents prior to conducting the review. The attorney will document receipt of files to ADOT. The review shall commence the first business day after documented receipt of complete files. ADOT has a goal of 22 days for completion of legal sufficiency review. Prior notice may allow schedules to accommodate a shorter review time by eliminating "Queue time."

The attorney will provide to ADOT when the review is completed; the dates the attorney sent comments to and to whom, the dates responses were received, any follow-on discussions and the date of final legal sufficiency. These procedures apply to both Environmental Documents and Section 4(f) reviews.

ADOT will update the document and submit revisions through accepted ENV document review process. The goal of this process is to complete revisions within 10 business days. ADOT will provide to AGO or reviewing attorney the following:

- 1. A transmittal memo or suitable electronic document stating the document has been revised pursuant to legal sufficiency review and requesting AGO acceptance of changes made.
- 2. A copy of revised document in MS Word format with track changes showing additions and deletions.
- 3. A copy of comment matrix and with comment responses

Upon acceptance of changes and completion of final review, the attorney will forward the legal sufficiency review, comments, and legal sufficiency finding to the ADOT ENV Administrator. This finding will contain the following language:

"I have reviewed the proposed Final Environmental Impact Statement (FEIS) [and/or Section 4(f) evaluation] for the Project (Federal Project Number), which proposed to build [brief description of the project and its location]. Pursuant to the provisions of 23 CFR § 771.125(b) [and/ or 23 CFR §774.7(d]), I find the proposed FEIS [and/or Section 4(f) evaluation] for this project to be legally sufficient.

In order to ensure that the legal sufficiency review is conducted on a final document, subsequent changes to the document already reviewed for legal sufficiency, from any source, must be reviewed by the attorney to assess any implications on the finding of legal sufficiency. It is the NEPA Assignment Manager's responsibility to ensure any subsequent changes are referred to the reviewing attorney.

If the attorney is reviewing an EA, the attorney sends a memo to the Environmental Planning Administrator stating the document "is ready for signature."

QA/QC Resources

The following documents are available to support quality assurance in developing documents and quality control in reviewing them:

- #15 Preparing High-Quality NEPA Documents for Transportation Projects
- Improving the Quality of Environmental Documents
- FHWA Memorandum on Improving the Quality of NEPA Documents



SECTION 4(F) DOCUMENTS REVIEW AND APPROVAL

This section only provides guidance on how to process projects with potential Section 4(f) resources; it does not provide guidance on conducting Section 4(f) evaluations. Please reference 23 CFR 774, the <u>FHWA Section 4(f) Policy Paper</u> and the ADOT *Section 4(f) Manual* for more information on how to identify and evaluate Section 4(f) properties and impacts.

For CE checklists, document that there is no approval required, the type of approval required, or that an exception(s) applies. An EA and EIS will document whether or not Section 4(f) properties are involved in a project. Additional forms have been incorporated in the Section 4(f) Manual to provide documentation if there is a question of whether or not a property is a Section 4(f) property or if a Section 4(f) use is questioned. Equivalents that amount to "negative declarations" are not required in every instance to document when Section 4(f) is not applicable. For example, projects on the Interstate that fall within applicability requirements of 23 CFR 774.11 do not require additional Section 4(f) documentation. A paving project within the existing transportation right-of-way requires no Section 4(f) documentation beyond that in the CE.

Note; the Cultural Resources Program Manager can perform all of the duties of the HPT Team Lead in regard to Section 106 and Section 4(f) document review and approval. The NEPA Assignment Manager may delegate Section 4(f) approvals to senior managers within Environmental Planning.

Section 4(f) Involving Historic Properties

HPT Specialists are responsible for identifying (with the assistance of the project team and consultants) historic Section 4(f) resources. If a potential Section 4(f) property is identified within or near a project's Area of Potential Effect (APE) the HPT Specialist coordinates with the HPT Team Lead and the Environmental Planner for consideration as needed and appropriate for the project circumstances. Such consideration could include:

- ✓ A description of the project with emphasis on the potential 4(f) resource(s) boundaries
- ✓ A preliminary assessment regarding applicability of the potential Section 4(f) property under 23 CFR 774.11 and what exception may apply under 23 CFR 774.13
- ✓ Potential Section 4(f) use and, if so, what type (temporary, permanent or constructive)
- ✓ Recommended Section 4(f) processing option for the project as appropriate (documenting applicability, no use, exceptions, *de minimis* impact, or programmatic or individual evaluation)

The HPT Team Lead consults with the ENV Administrator as needed and communicates concurrence or provides direction to the HPT Specialist and Environmental Planner in regard to the issues in question. If warranted the HPT Specialist documents the decisions made on projects in which there is a question of whether or not a historic property is a Section 4(f) property or if a potential Section 4(f) impact use is in question. In such situations a "No Section 4(f) Property/Use Form" is used to document the decision. Note that a "No Section 4(f) Property/Use Form" is not required for every lack of a Section 4(f) property or no use of a Section 4(f) property on a project.



1.1.20 Reviews for exceptions and *de minimis* impact involving historic properties:

Exceptions

- a. HPT Lead reviews all Section 106 consultation letters that include Official with Jurisdiction (OWJ) coordination involving historic properties. Section 106 compliance is used by ADOT for the applicability of exceptions outlined in 23 CFR 774.13.
- b. HPT prepares a Section 4(f) Applicability/Exceptions Form to document exceptions applied under 23 CFR 774.13 for historic properties for HPT Lead approval. Concurrence of Temporary Occupancy applicability criteria is included with the Section 106 consultation and acknowledged on the form.

De minimis Impact

- a. HPT Lead reviews all Section 106 consultation letters that include OWJ coordination for a Section 4(f) use. The consultation letter includes a statement that ADOT intends to make a *de minimis* impact determination with the concurrence of the effects determination under Section 106.
- b. HPT prepares the **Section 4(f)** *De Minimis* **Impact on Historic Properties Form.** The HPT Lead and/or Cultural Resources Manager and the ENV Administrator reviews the form.
- c. The Cultural Resources Manager approves the form. The ENV Administrator may also approve the form.

1.1.21 Reviews for programmatic and individual Section 4(f) evaluations involving historic properties:

- 1. The Environmental Planner, HPT, and ENV Administrator discuss and agree on processing options of a Section 4(f) use with a programmatic or individual Section 4(f) evaluation
- 2. The Environmental Planner and HPT Specialist work with the consultant team to develop the initial Section 4(f) document
- 3. The Environmental Planner provides the initial Section 4(f) document to the HPT Team Lead, and the AGO for an individual Section 4(f) evaluation, for QC and legal pre-review
 - a. The Environmental Planner may also elect to have the NEPA Assignment Manager or Project Delivery Manager review the document.
- 4. The HPT Lead's review comments and any legal comments received are sent by the Environmental Planner to the consultant for incorporation into the final draft Section 4(f) document
- 5. The Environmental Planner and HPT Specialist ensure any Manager and legal reviewer comments are addressed
- 6. Individual Section 4(f) evaluations shall be provided to the OWJ over the Section 4(f) resource and to the Department of the Interior, and as appropriate, to the Department of Agriculture and the Department of Housing and Urban Development. A minimum of 45 days for review and receipt of comments shall be provided. See 23 CFR 774.5(a).



- 7. The Environmental Planner ensures a Legal Sufficiency statement is included in the project file for a final individual Section 4(f) evaluation
- 8. ENV Administrator approves programmatic and individual Section 4(f) evaluations
 - a. The HPT Team Lead or NEPA Assignment/Project Delivery Manager can approve a Section 4(f) evaluation involving a historic property in the absence of the ENV Administrator.

Constructive Use

If there is a potential for a Section 4(f) use that requires a constructive use consideration the decision on the Section 4(f) processing approach is to be made by the ENV Administrator. Constructive use determinations are extremely rare and require coordination and approval from FHWA Headquarters through the FHWA Arizona Division.

Section 4(f) Involving Parks, Recreation Areas, and Wildlife and Waterfowl Refuges

Environmental Planners are responsible for identifying (with the assistance of the project team and consultants) publicly owned parks, recreational areas, and wildlife and waterfowl refuges as Section 4(f) resources. If a potential Section 4(f) property is identified within or near a project's study area or footprint the Environmental Planner coordinates with the Project Delivery Manager or the NEPA Assignment Manager for consideration as needed and appropriate to the project circumstances. Such consideration could include:

- ✓ A description of the project with emphasis on the potential 4(f) resource(s) boundaries
- ✓ A preliminary assessment regarding applicability of the potential Section 4(f) property under 23 CFR 774.11 and what exception may apply under 23 CFR 774.13
- ✓ Potential Section 4(f) use and, if so, what type (temporary, permanent or constructive)
- ✓ Recommended Section 4(f) processing option for the project as appropriate (documenting applicability, no use, exceptions, *de minimis* impact, or programmatic or individual evaluation)

The Project Delivery Manager or NEPA Assignment Manager consults with the ENV Administrator as needed and communicates concurrence or provides direction to the Environmental Planner in regard to the issues in question. A decision is made before coordination with an OWJ is initiated.

The Environmental Planner documents the decisions made on projects in which there is a question of a potential Section 4(f) property or if a potential Section 4(f) impact use is in question. In such situations a "No Section 4(f) Property/Use Form" is used to document the decision. Note that a "No Section 4(f) Property/Use Form" is not required for every lack of a Section 4(f) property or no use of a Section 4(f) property on a project.

1.1.22 Reviews for exceptions and use with *de minimis* impact involving parks, recreation areas and wildlife and waterfowl refuges:

Exceptions

a. The Environmental Planner completes the Section 4(f) Applicability/Exceptions Form and emails the draft form to the Project Delivery Manager or NEPA Assignment Manager for review. The ENV Administrator may also review the draft form.



- i. The OWJ, as applicable, signs the form for temporary occupancy or an enhancement.
- b. The ENV Administrator, or designee, approves the **Section 4(f) Applicability/Exceptions**Form

De minimis Impact

- a. Environmental Planner coordinates with the NEPA Assignment Manager or Project Delivery Manager before initiating contact with the OWJ when there is a Section 4(f) use with a *de minimis* impact determination
- b. The Environmental Planner emails the draft Section 4(f) De Minimis Impact on Public Parks, Recreational Areas and Wildlife and/or Waterfowl Form to the Manager for review. The ENV Administrator may also review the draft form.
- c. After a draft has been reviewed the Environmental Planner ensures OWJ coordination and public involvement requirements are met
- d. The Environmental Planner signs the Section 4(f) De Minimis Impact on Public Parks, Recreational Areas and Wildlife and/or Waterfowl Form and the ENV Administrator approves the form

1.1.23 Reviews for programmatic and individual Section 4(f) evaluations involving parks, recreation areas and wildlife and waterfowl refuges:

- 1. The Environmental Planner, Project Delivery Manager or NEPA Assignment Manager, and the ENV Administrator discuss and agree on processing options of a Section 4(f) use with a programmatic or individual Section 4(f) evaluation
- 2. The Environmental Planner and work with the consultant team to develop the initial Section 4(f) document
- 3. Environmental Planner provides the initial Section 4(f) document to the Project Delivery Manager or NEPA Assignment Manager, and the AGO for an individual Section 4(f), for QC and legal prereview
- 4. The Project Delivery Manager or NEPA Assignment Manager's review comments and any legal comments are sent to the consultant for incorporation into the final draft Section 4(f) document
- 5. The Environmental Planner ensures any Project Delivery Manager or NEPA Assignment Manager and legal review comments are addressed
- 6. Individual Section 4(f) evaluations shall be provided to the OWJ over the Section 4(f) resource and to the Department of the Interior, and as appropriate to the Department of Agriculture and the Department of Housing and Urban Development. A minimum of 45 days for review and receipt of comments shall be provided. See 23 CFR 774.5(a).



- 7. The Environmental Planner ensures a Legal Sufficiency statement is included in the project file for a final individual Section 4(f) evaluation
- 8. ENV Administrator approves programmatic and individual Section 4(f) evaluations
 - a. The Project Delivery Manager or NEPA Assignment Manager can approve a Section 4(f) evaluation involving a park or wildlife or waterfowl refuge in the absence of the ENV Administrator.

Constructive Use

If there is a potential for a Section 4(f) use that requires a constructive use consideration the decision on the Section 4(f) processing approach is to be made by the ENV Administrator. Constructive use determinations are extremely rare and require coordination and approval from FHWA Headquarters through the FHWA Arizona Division.



APPENDIX



CE Quality Control Checklist

Project Data:	
Project Name: Click here to enter text	ADOT Project Number: Click here to enter text
Route or Location: Click here to enter text	Federal-Aid Number: Click here to enter text
Environmental Planner: Click here to enter text	CE Reviewer: Click here to enter text

Project Information All Project Information boxes on the CE Checklist are complete and correct: Project Name, ADOT Project Number, Federal-aid Number, CE Start Date, Estimated Construction Cost, Programming/Fiscal Construction Administration and FMIS Designation Location and Limits Yes □ Route and MP Limits provided (or LPA project location)? Yes □ City and County denoted? Yes □ Institute Institut	Partie of Lafe annual design					
Pederal-aid Number, CE Start Date, Estimated Construction Cost, Programming/Fiscal Constraint, Construction Administration and FMIS Designation	Project Inf					
Yes □ Route and MP Limits provided (or LPA project location)? Yes □ City and County denoted? Yes □ n/a □ Existing land ownership of facility provided (ADOT ROW, underlying land management agency or tribal lands for easements or LPA ROW)? Purpose and Description Complete Scope of work listed in bullet format, and consistent with current stage project plans and technical reports? Yes □ New ROW or permanent easements and/or temporary construction easements (TCEs) information identified or "no new ROW" denoted as applicable? Yes □ Description of known substantial detours or new temporary access roads Type of CE Yes □ CE type is selected and is appropriate (note: more than one type of CE may apply) Environmental Review Section Yes □ Air Quality drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Noise drop-down selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Biological Resources drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Section 4(f) drop-down menu selection made on the CE Checklist. Documentation is in the project file for exception(s) and/or approval of a Section 4(f) use; de minimis impact or programmatic evaluation? Yes □ Section 404 Clean Water Act drop-dow	Yes □	Federal-aid Number, CE Start Date, Estimated Construction Cost, Programming/Fiscal Constraint, Construction				
Yes □ City and County denoted? Yes □ n/a □ Existing land ownership of facility provided (ADOT ROW, underlying land management agency or tribal lands for easements or LPA ROW)? Purpose and Description Yes □ Complete Scope of work listed in bullet format, and consistent with current stage project plans and technical reports? Yes □ New ROW or permanent easements and/or temporary construction easements (TCEs) information identified or "no new ROW" denoted as applicable? Yes □ Description of known substantial detours or new temporary access roads Type of CE Yes □ CE type is selected and is appropriate (note: more than one type of CE may apply) Environmental Review Section Yes □ Air Quality drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Noise drop-down selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Biological Resources drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Cultural Resources drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Section 4(f) drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Section 4(f) drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable? Yes □ Section 4(f) drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable?	Location a	nd Limits				
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the file as applicable? 401 Clean Water Act drop-down menu selection made on the CE Checklist. Technical documentation is in the file	Yes□					
	Yes□	he file as applicable?				
Yes Hazardous Material drop-down menu selection made on the CE Checklist. Technical documentation is in the file as applicable?	Yes□					
Yes Public Involvement for the project has been conducted consistent with the ADOT Public Involvement Plan?	Public Involvement for the project has been conducted consistent with the ADOT Public Involvement Plan?					



Environmental Revi	iew Section [Other Considerations]				
	If Other Considerations are included ensure the appropriate documentation is in the file. For example, if the project impacts adjacent farmlands an NRCS overview of farmland should be in the file.				
Constraints under 2	23 CFR 771.117(e)				
	re all constraints checked? These are only required for the following CE types: (c)(26), (c)(27), (c)(28). All her CEs check " n/a "				
Yes□ n/a □ Is a	additional information provided for any "Yes" constraint checked?				
NEPA Certification a	and Determination				
Yes The project selected?	ect meets the definition of a CE under 23 CFR 771.117(a) and (b) and the correct authorizing MOU is				
Environmental Com	nmitments				
Yes□ n/a □ EN	NV Commitments are included with the project and any permits and flyers are included?				
ENV-Drive Folder Re	eview				
Yes All applica	rable template folders are in the Project File?				
Yes □ All applica	All applicable Tech Reports in the Project File?				
Yes □ All the Te	All the Tech Review comment emails have been saved to the "Review Comments" folder?				
Reviewer Comments	s				
CE Reviewer:	Date:				
Reviewer signs after all bo	oxes under the Environmental Review Section are checked "Yes" and confirming comments are addressed				



Individual CE Quality Control Form

Project Information:	
Project Name: Route or Location: Environmental Planner:	ADOT Project Number: Federal-Aid Number:

This form is to be completed for CEs prepared for projects that are individually documented and approved under 23 CFR 771.117(d) and approved pursuant to 23 USC 327 and the 327 MOU executed by ADOT and FHWA.

Certification:

regu	This CE complies with ADOT Environmental Planning guidance and the requirements of all applicable federal laws, regulations and Executive Orders. I acknowledge the appropriate quality controls have been approved and signed. The				
CE is	ready for signature.				
	ADOT District and Project Manager have been sent	a copy of the Environmental Commitments for review			
	A completed CE QC Checklist is located in the Project	ct File			
	Coordination with ADOT Civil Rights Office is docum	nented in the Project File			
	The CE is logged in the MOU Tracking and Reporting spreadsheet				
NEP	NEPA Assignment Manager/Project Delivery Manager: Date:				
Click	Click here to enter text.				



EA Quality Control Checklist

Projec	t Info	rmatio	n:							
Project	Name	e:			☐ Federal Assigned	☐ Federal Not Assigned (FHWA)				
TRACS	No:			Federal-aid No:		QC Review Begin Date :				
District	t:		Project Sponsor:							
	to cond of cont oresent	tent if	Major Required Conte	ent						
Yes	No	N/A								
			Cover Page and Table of Cont	ents						
Yes	No	N/A								
			Follows Cover Page and Table	of Contents format in	ADOT EA/ EIS Guidance Manual Ap	pendix A				
					ect number, route, and termini					
			Signature block, document sta							
			23 U.S.C. 327 MOU assignmen	t language is on cover	page of the EA					
	to cond of cont oresent:	tent if	EA Specific Review Se	ction						
Yes	No	N/A								
			EA Table of Contents: include	list of tables, figures, a	appendices,					
			Proposed Project	Proposed Project						
			Introduction: Brief introduction	Introduction: Brief introduction including suitable figures						
			Existing Facility or Project Des	cription						
			Logical termini and independe	Logical termini and independent utility description discussion						
			Includes location, length, typ	e of improvements, and	d any ROW / Easements needed					
Yes	No	N/A	Purpose and Need							
			Purpose and Need Statement	IS .						
			Planning Requirements	- I -						
			Year Construction Program (re	-		Plan, Transportation Plan, and is in ADOT Five				
Yes	No	N/A	Alternatives							
			Discussion of Project build alte	ernative(s)						
			Estimated Project Cost Inform	ation						
			Project No-build Alternative							
			Identification of Preferred Pro							
			-	Locally Preferred Project Alternative should one have been identified						
			Project Alternatives Considered But Eliminated From Further Consideration							
			Comments and Coordination Commitments (table recomm	-	a Agency Coordination)					
			EA Avoidance, Minimization a	•	curos					
			References Cited	ind/or wiltigation wea	sures					
			List of Acronyms							
			<u>-</u>	s for environmentall	v relevant document information	n, confirm topic files do exist electronically				
				•	-	within the Technical Area Content Review				
			checkboxes reviewed belov		., 3					



Planner to conduct QC review of content if present :		Major Requi	ired Content					
Yes	No N/A							
	conduct QC f content if			Technical Area Content Review-				
	sent :	Affected Environment / Impacts / Avoidance, Minimization and Mitigation Measures						
Yes	No	Included in this Document	Not required for this Document	Verify investigation outcomes and project effects are appropriate for each topic. Verify applicable avoidance, minimization, mitigation measures, and commitments for each review topic.				
				Right of way/Displacements				
				Land Use (Consistent with current STIP/TIP, RTP, or MTP)				
				Farmlands				
				Community Impacts, LEP, ROW/Displacements, community facilities, community cohesion, public health and safety				
				Utilities/Emergency Services				
				Traffic and Transportation/Pedestrian and Bicycle Facilities				
				Visual/Aesthetics				
				Economics				
				Historic Resources				
				Archeological Resources				
				Water Quality				
				Floodplain				
				Hazardous Materials				
				Joint Development (If applicable)				
				Air Quality				
				FHWA air quality conformity determination (place in appendix)				
				Noise Requirements				
				Ecosystems (Wetlands, Wildlife, T&E Species, Natural Communities)				
				Construction Impacts				
				Mitigation Summary				
				Indirect Impacts				
				Section 4(f) – If applicable				
				Section 6(f) – If applicable				
				FHWA Constructive Use Determination				
Attach co		needed. Identify	comment by sect	ion or paragraph number when reviewing, e.g., Section XX.yy comment; Section YY.zz				
Draft EA	A Checklist	Approval						
	t Approve ere to ente			Date:				



EA Quality Control Form

Project Information:	Project Information:					
Project Name:	Construction Project Administration					
ADOT Project Number:	ADOT CA Agency					
Federal-Aid Number: Estimated Project Construction Cost:	Planning Requirements:					
NEPA Start Date: Click here to enter a date.	☐ Fiscal Constraint/Design Concept and Scope					
Draft Environmental Document Approval:						
I have reviewed this Draft EA and find that it of all applicable federal laws, regulations and E	omplies with ADOT Environmental Planning guidance and the requirements Executive Orders					
☐ The consultant has submitted a quality co	ontrol certification					
☐ The required Technical Section(s) review	has been completed					
☐ An EA Quality Control Checklist has been	completed and the environmental document meets all ADOT requirements					
Environmental Planner: Click here to enter text.	Date:					
	omplies with ADOT Environmental Planning guidance and meets all ADOT					
☐ The completed quality control reviews ar	re located in the Project File					
☐ Legal counsel has reviewed the draft environmental document (optional)						
NEPA Assignment Manager/Project Delivery M						



Final Environmental Document Approval:

		I and find that it complies with ADOT Environmental Planning oplicable federal laws, regulations and Executive Orders			
	The consultant has submitted a quality control certification				
	All Project Team comments have been adequately addressed and incorporated in the final environmental document				
	All substantive public and agency incorporated in the final environm	comments have been adequately addressed and responses ental document			
	Any necessary technical report upo	dates have been completed and are located in the project file			
	A legal sufficiency review has be completed as part of the EA (if app	een completed if an individual Section 4(f) evaluation was blicable)			
	Environmental Planner: Date: Click here to enter text.				
I hav		find that it complies with ADOT Environmental Planning guidance			
and	all ADOT requirements				
	The completed quality control revi	ews are located in the Project File			
		,			
NEP	NEPA Assignment Manager: Date:				
Click	Click here to enter text.				



EIS Quality Control Checklist

Projec	t Info	rmatic	on:						
Project	Name	e:			☐ Federal Assigned	☐ Federal Not Assigned (FHWA)			
TRACS	No:			Federal-aid No:		QC Review Begin Date :			
District	:		Project Sponsor:						
	to cond of cont resent:	tent if		Ma	ajor Required Content				
Yes	No	N/A							
			Cover Page and Table of Con	tents					
Yes	No	N/A							
					ADOT EA/ EIS Guidance Manual Ap	pendix A			
					ect number, route, and termini				
			Signature block, document sta	•	of the FIC				
Planner			23 U.S.C. 327 MOU assignmen						
review	of cont	tent if		EIS	Specific Review Section				
Yes	No	N/A							
			EIS ROD						
			Follows document type forma	t in ADOT EA/EIS Guida	nce Manual Appendix A				
			Decision	Decision					
			Alternatives considered; selec	tion of the Preferred Al	ternative is noted and discussed				
			FHWA Transportation Conformity Finding is present-when applicable						
			EIS Executive Summary						
			Introduction						
			Purpose and Need Statement						
			Alternatives Considered Parag	,	A Mikiki MA C				
					s, and Mitigation Measures Summa	У			
			Public and Agency Coordinati Cooperating Agency Evaluation						
			Table of Contents: include list	· · · · · · · · · · · · · · · · · · ·	endices and List of Acronyms				
			Proposed Project	- tables,ga. es, appe					
			Introduction: Brief introduction	on including suitable fig	ures				
			Existing Facility or Project De						
			Logical termini and independe	nt utility description di	scussion				
			Includes location, length, type	of improvements, and	any ROW / Easements needed				
			Purpose and Need						
			Purpose and Need Statements	5					
			Planning and Programming St	atus					
			Project is Consistent with Arizo Construction Program (require	= :	· ·	n, Transportation Plan, and is in ADOT Five Year			
			Alternatives						
			Discussion of Project build alte	arnativo(s)					



	to cond of cont resent :	ent if	Major Required Content					
Yes	No	N/A						
			Estimated Project	Cost Information				
			Project No-build	roject No-build Alternative				
			Identification of P	Preferred Project Al	ternative for Final Environmental Document			
	□ □ Project Alternatives Considered But Eliminated From Further Consideration							
	<u> </u>		_	Table of Contents				
				nization and/or Mi				
					Involvement and Agency Coordination)			
			Permits and Appr		1			
			-	able recommended	1			
			List of Preparers-					
			Distribution List-	EIS OIIIY				
			References cited					
			electronically (for environmentally relevant document information, confirm topic files do existents contain complete public records supporting the decisions within the Technical Area iewed below.			
reviev	r to con v of con present			Affected Enviro	Technical Area Content Review- onment / Impacts / Avoidance, Minimization and Mitigation Measures			
Yes	No	N/A	Included in this Document	Not required for this Document	Verify investigation outcomes and project effects are appropriate for each topic. Verify applicable avoidance, minimization, mitigation measures, and commitments for each review topic.			
					Right of way/Displacements			
					Land Use			
					Consistent with current STIP/TIP, RTP, or MTP			
					Farmlands			
					Community Impacts, LEP, ROW/Displacements, community facilities, community cohesion,			
					public health and safety			
					Utilities/Emergency Services			
					Traffic and Transportation/Pedestrian and Bicycle Facilities			
					Visual/Aesthetics			
					Economics			
					Historic Resources			
					Archeological Resources			
					Water Quality			
					Floodplain			
					Hazardous Materials			
					Joint Development (If applicable)			
					Air Quality			
					FHWA air quality conformity determination (place in appendix)			
					Noise			
					Ecosystems (Wetlands, Wildlife, T&E Species, Natural Communities)			



					Relationship between local short-term uses of the maintenance of the human environment and the maintenance and enhancement of the long-term productivity
					Any Irreversible and irretrievable commitments or resources which would be involved in the proposed action
					Construction Impacts
					Mitigation Summary
					Indirect Impacts
					Section 4(f) – If applicable
					Section 6(f) – If applicable
					FHWA Constructive Use Determination
Attach comme		ents as n	eeded. Identify	comment by sect	ion or paragraph number when reviewing, e.g., Section XX.yy comment; Section YY.zz
Draft E	IS Ch	ecklist A	Approval		
Checkl	ist Ap	prover:			Date:
Click h	iere to	enter	text.		



EIS Quality Control Form

Project Information:					
Project Name:	Construction Project Administration				
ADOT Project Number:	ADOT □ CA Agency □				
Federal-Aid Number:	Planning Requirements:				
Estimated Project Construction Cost:					
NEPA Start Date: Click here to enter a date.	☐ Fiscal Constraint/Design Concept and Scope				
Draft Environmental Document Approval:					
	nat it complies with ADOT Environmental Planning guidance deral laws, regulations and Executive Orders				
☐ The consultant has submitted a qual	ity control certification				
☐ An EIS Quality Control Checklist has ADOT requirements	been completed and the environmental document meets all				
Environmental Planner:	Date:				
Click here to enter text.					
I have reviewed this Draft EIS and find that it of all ADOT requirements	omplies with ADOT Environmental Planning guidance and meets				
☐ The completed quality control review	ws are located in the Project File				
☐ The Arizona Attorney General's Office	ce has reviewed the Draft EIS (ADOT requirement)				
I acknowledge the Draft EIS is ready for s	ignature and agency and public review				
NEPA Assignment Manager/Project Delivery	Manager: Date:				
Click here to enter text.					



Final Environmental Document Approval:

ave reviewed this Final EIS and ROD and find that it complies with ADOT Environmental Planning dance and the requirements of all applicable federal laws, regulations and Executive Orders.					
The consultant has submitted a quality control certification					
All Project Team comments have been adequately addressed and incorporated in the final environmental document					
All substantive public and agency comments have been adequately addressed and responses incorporated in the final environmental document					
Any necessary technical report updates have been completed and are located in the project file					
ironmental Planner: Date:					
ve reviewed this Final EIS and ROD and find that it complies with ADOT Environmental Planning guidance all ADOT requirements.					
The completed quality control reviews are located in the Project File					
A Legal Sufficiency Review for the Final EIS and ROD has been completed and the AGO Legal Sufficiency determination is located in the Project File					
PA Assignment Manager <mark>/Project Delivery Manager</mark> : Date: k here to enter text.					



EA/EIS Re-Evaluation Quality Control Form

Project Information:			
Project Name: Route or Location: Environmental Planner:	ADOT Project Number: Federal-Aid Number:		

This form is to be completed for EA or EIS formal Re-Evaluations prepared for projects and approved pursuant to 23 USC 327 and the 327 MOU executed by ADOT and FHWA.

Certification:

This Re-Evaluation complies with ADOT Environmental Planning guidance and the requirements of all applicable federal laws, regulations and Executive Orders. I acknowledge the appropriate quality controls have been approved and signed. The Re-Evaluation is ready for signature.				
	All applicable technical reports are in the project file			
	All the technical and project team review comment emails have been saved to the "Review Comments" folder			
	All required permits and flyers associated with Environmental Commitments are included			
	The Re-Evaluation is logged in the MOU Tracking and Reporting spreadsheet			
	A Assignment Manager/ <mark>Project Delivery Manager</mark> : c here to enter text.	 Date:		



Standard Project File Folders (Template)

Legend						
A	Project Folder (level 1)					
•	Main Sub-folder (level 2)					
- Sub-folder (level 3)						
o Sub-folder (level 4)						
	 General description of folder contents 					

- > Route Project Number Project Name (All Projects)
- Admin
 - Communications
 - Fiscal constraint
 - Class of Action Memo (if applicable)
 - Contract
 - FHWA Authorization Letter (if applicable when project authorized)
 - PEDS (if applicable)
 - Project Establishment
 - For EA/ICE: Project framework, Project Kickoff Meeting, LPA Initiation Letter
 - NOI (For EIS)
 - Schedule (if applicable)
- Air Quality
 - AQ Clearance
 - Conformity
 - Interagency Consultation
- Bio
 - Admin
 - Past Docs
 - o ENV clearance review
 - PEDS
 - Agency Coordination
 - USFWS
 - Other agencies



- Approved BE or BESF
- Bio Evaluations
- Bio Scoping
 - Agency letters
 - Species lists
- Communications
 - o Emails

Cultural

- Project Information
 - o Financial
 - o PEDS Etc. (schedules, plans, and misc. information)
- Communication
 - o Emails
 - Meetings
- Background Research
- Maps and Graphics
- Technical Reports
- Consultation Letters
- Mitigation Measures
- Section 4(f)
- Agreement Docs
- Closeout Memo

Engineering

- Plans (Design, ROW, Utility, etc.)
- Special Provisions (if applicable)
 - Geotechnical/Other Preliminary Engineering (if applicable)
 - For EIS: Alternative Selection Report (ASR), Corridor Selection Report (CSR),
 Design Concept Report (DCR)
 - For EA/ICE: Design Concept Report (DCR), Schematic Design/PA, Design Plans, other Engineering or Traffic Reports (if applicable)

ENV Justice (Only projects prior to 3/27/2025)

- ENV Review Docs
 - Categorical Exclusion
 - Draft CE, Final CE



- ENV Commitments and EPIC
- Review Comments
- Other (add folders as needed)
 - Note-to-File, Geotechnical, Past Environmental Documents (for reference), Early ROW Acquisitions

Replace CE folder and add folders for an EA or EIS as needed (not in folders template)

- For EIS: Preliminary Drafts, Signed "Public Review" Draft and Final documents, Review
 Comments
- For EA: Preliminary Drafts, Signed "Public Review" Draft and Final documents, Review Comments

• Final Certification

- QAQC Forms
 - For CEs CE QC Checklist, ICE QC Form
 - For EA/EIS EA/EIS QC Checklist and Form, QC Transmittal from Consultant (for draft and final documents)
 - For EA/EIS: Federal Register Notices of Final Agency Action (SOL)
 - For 327 Re-Evaluations Note to file forms or EA/EIS Re-evaluation Quality Control
 Form
- STIP
 - Screenshot or other
 - for all EA/EIS/ICE, unless Tier 1 EIS documents
- NOFAA (add folder for EA/EIS)
 - Notice of Final Agency Action Documentation

Hazmat

- Communications
 - Emails, PEDS, Related Reports
- PISA
 - Preliminary Initial Site Assessment (PISA)
 - Lead Based Paint (LB), Asbestos Containing Materials (ACM), and Phase I/II/III (if necessary)

Meetings

- Kick-off
- Progress meetings, kickoff meeting, minutes, etc.



- Noise (Projects without Noise Analysis)
 - Communications
 - Noise Checklist
- Noise (Projects with Noise Analysis)
 - Communications
 - Reports
 - Other Information
 - Public Involvement
 - TNM Modeling Data
- Scoping
 - Draft Letters
 - Final Letters
 - **Responses** (if applicable)
 - For EA/EIS: Final PDF agency scoping letters to Cooperating/Participating agencies (see Public Involvement for additional scoping requirements)
- Section 404
 - Admin
 - PEDS/proposals/contracts
 - Communication
 - Emails
 - PJD or AJD
 - Section 404 401
 - PJD or AJD Documentation (if applicable)
 - Section 404 (Submittal for review, if applicable)
 - Sub1
 - Section 401 (Submittal for review, if applicable)
 - Sub1
 - Permit Documentation for Section 404 and 401 (always applicable due to No WOTUS Permit closeout memo)
 - Issued 404 Permit (if applicable)
 - Issued 401 Water Quality Certification (if applicable)
 - No WOTUS Permit closeout memo



Other (Move sub-folders needed to the main level if utilized – Delete "Other" folder if unused)

- Public and Agency Involvement:
 - For EA/EIS/ICE projects with meetings and/or public hearing meeting information to include such materials, notification, summary report, Notice of Availability (NOA) for EIS documents or final notice (Gov Delivery) for EA's.
 - Agency correspondence documentation (meetings, memos, emails, etc.).
 - Public comments and responses from EA/EIS/ICE public meetings or hearings.
 Public hearing summary reports (as applicable).
- Purpose and Need: For EA/EIS, include final document as part of EA or EIS or memo
- Section 4(f)/6(f): Include documentation of forms or letters and any Section 4(f) evaluations (programmatic or individual) that were completed as part of NEPA

Notes:

- *Other disciplines such as **Farmland, Floodplain, Right of Way, Socioeconomic, Sole Source Aquifer** can have documentation in file if applicable for project NEPA consideration.
- If any of folders are empty, delete as not applicable.
- If general emails are saved to the project file, they are consolidated to what is only necessary for decision making/informational purposes.



ADOT Standard Work for the Federal Infrastructure Permitting Dashboard



ABOUT PROJECTS RESOURCES & TOOLS FAST-41 SCORECARD



Purpose: The Federal Infrastructure Permitting Dashboard is a tool used to track the Federal government's environmental authorization process for large-scale infrastructure projects. The purpose of this tracking tool is to create transparency between agencies, developers, and the public. The Dashboard tracks infrastructure projects under Title 41 of the Fixing America's Surface Transportation Act (FAST-41) and projects subject to Titles I, IX, and XI of the FAST Act (DOT projects). All projects on the Permitting Dashboard can be found on an interactive map on the main webpage.

Quality Assurance: ADOT's Federal Infrastructure Permitting Dashboard standard work has been completed and is the how-to guidance and is now found in the Appendix of the QA QC Plan. ADOT ensures accurate compliance by assigning an ADOT Dashboard Administrator (NEPA Assignment Manager), a redundant oversight person (Project Delivery Manager), and the Dashboard point of contact (Environmental Project Manager). The three positions are part of the Dashboard national quarterly meeting and then internally the group meets quarterly to review the applicable projects.

Quality Control – Project Level Steps:

MAX.GOV Login

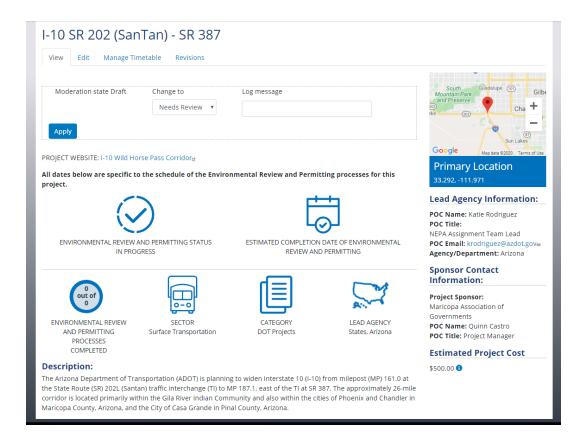
Login information: USER ID and Password are rotated regularly by the MAX security process. These are redundantly kept by the NEPA Assignment Manager and the Environmental Project Manager assigned to the dashboard.

Search: The website will automatically take you to the "Search Projects & Actions" page. Here you can search the project title, click apply, and find the specific project below.

Create: Select "Add Permitting Project" to create a new project page.

View Tab - General Overview: Information should be concise and verified through project website, 327 MOU Monitoring Spreadsheet, project file, and Planner.





Edit Tab - **General Information**: Information should be concise. Include project website information if known and general total project cost.

Populate

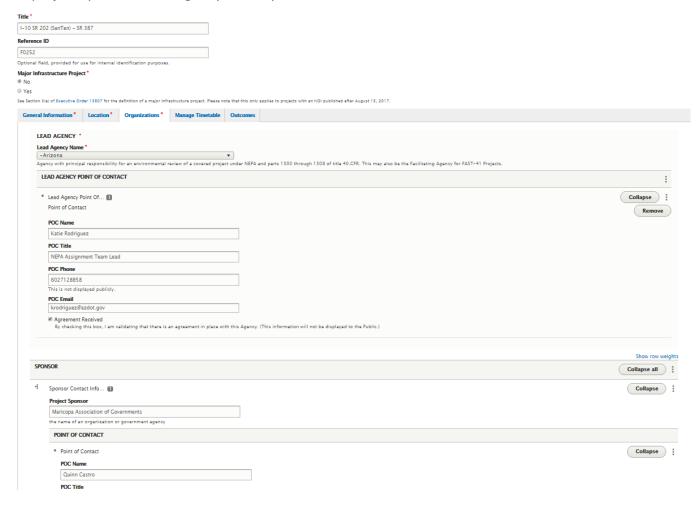
- Title
- Reference Number (ADOT Project Number)
- Major infrastructure Projects (ADOT projects are not usually MIP)
- General Information
- Project Website
- Justification of a Covered Project (ADOT projects are not usually in this category)
- Total Estimated Project Cost



Edit Tab - Location: Include GIS (lat./long) coordinates for location

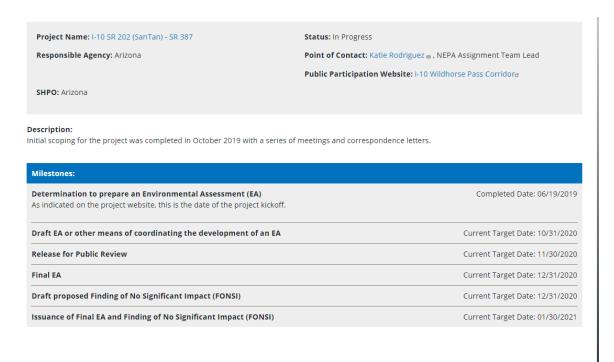


Edit Tab - Organization Info: Put NEPA Assignment contact person information and general info for project sponsor. Lead Agency is always ADOT.



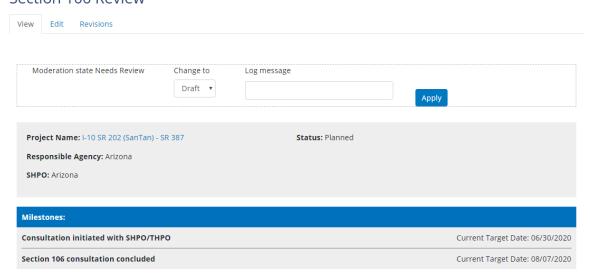


Edit Tab – Manage Timetable: Timetable Actions are dependent on project. Commonly used ones are EA/EIS, Section 106, Section 404 (if applicable), and Section 7/Endangered Species (if applicable). Responsible agency is ADOT, and milestones should be generated based off of project information in project file, website, 327 MOU monitoring spreadsheet, and Planning.



Edit Tab – Outcomes: Example

Section 106 Review



Final Steps: Move to publish options at bottom of page and execute final review and publishing



Amendments to QAQC Plan

Description of Modification

Change	Date	Responsible
Start of 327 MOU	04/16/19	
327 MOU date added on page 4. Self-Assessment section modified	01/21/20	PAO
page 7. Clarification added that the Wetland Biologist reviews		
cooperating agency letters sent to the Corps and the Biologist reviews		
cooperating agency letters sent to the USFWS (pg. 15). EA and EIS QC		
Checklists modified. Reference to EJ Checklist deleted from CE QC		
Form. Note added to QC Forms for final technical report updates.		
Self-assessment outline modified in Section 2.5.1.1. The 327 MOU	02/04/21	PAO
Audit – Administrative Folders Outline was added to the appendix		
and a reference added under Section 2.5.1.2. The ADOT Standard		
Work for the Federal Infrastructure Permitting Dashboard was added		
to the appendix and a reference added under Section 3.3.3.1.		
Reference to "One Federal Decision" removed.		
Clarified Project Delivery Manager can approve the QC Form for an	05/21/21	PAO
Individual CE. Page 15 step 7 and page 16 step 8. Clarified that the		
Project Delivery Manager can approve QC Forms (Pages 17 – 19).		
Forms updated.		
Appendix: CE QC Checklist updated. Administrative Folders Outline	01/19/23	PAO
updated.		
Performance measures updated to reflect changes from MOU	02/29/24	PAO
updates. CE QC Checklist updated. EPIC added to Standard Project File		
Folders (Template). FHWA Authorization letter moved from Final		
Certification folder to Administrative folder in the Administrative		
Folders Outline. Other minor project folders updates. QAQC form		
headers updated (ADOT logo). EA/EIS Re-Evaluation Quality Control		
Form added pg. 47.		
ADOT logo update. References to EPIC sheet added pages 20 and 21.	05/27/25	PAO
Deletion of reference to environmental justice communities in		
performance measures pages 10 and 13. CEQ references changed		
with NEPA environmental document definition pg. 15 and page limit		
references pg. 16. CEQ regulation reference to e-NEPA filing removed		
pg. 18. Removal of sharing Individual CEs with the CRO for EJ review		
pg. 22. Deletion of reference to "Indirect and cumulative impacts"		
folder pg. 52. EJ Folder note added (projects prior to 3/27/2025).		
Environmental Justice and Cumulative Impacts removed from EA and		
EIS QC Checklists.		

Note*: version stays the same for minor changes with sub-version letter added. The cover date is updated to the month of the revision.