



U.S. Department  
of Transportation

**Federal Highway  
Administration**

FHWA Alaska  
Division

Alaska DOT&PF

# Program Review

## **Categorical Exclusion (CE) Assignment Compliance Review (23 U.S.C. 326) for the Renewed MOU [Executed September 20, 2012]**



**May 2015  
FINAL REPORT**

## Table of Contents

<b>Executive Summary .....</b>	<b>2</b>
<b>Background .....</b>	<b>5</b>
<b>Purpose and Objective .....</b>	<b>6</b>
<b>Scope and Methodology .....</b>	<b>7</b>
<b>Team Members .....</b>	<b>10</b>
<b>Results: Findings and Observations .....</b>	<b>11</b>
<b>Successful Practices .....</b>	<b>15</b>
<b>Conclusion.....</b>	<b>16</b>

## **Executive Summary**

The purpose of this review is to satisfy the requirement of 23 U.S.C. §326 for monitoring the Alaska Department of Transportation and Public Facilities' (DOT&PF) compliance with the provisions of the Section 326 MOU (also known as the 6004 MOU). The State's performance is important as an ongoing matter and will be considered when it is time to determine whether or not to renew the current MOU when it expires. This review, the fourth review for Alaska, will also serve to evaluate the State's performance in carrying out the procedures established for the CE Assignment, and to evaluate the effectiveness of those procedures in achieving compliance.

A team of three (3) individuals from the Federal Highway Administration (FHWA), representing the Alaska Division Office (Alaska Division), the FHWA Resource Center, and the Headquarters Office of Project Development and Environmental Review, conducted interviews and reviewed project files in the Alaska FHWA Division Office between January 21 and January 30, 2015. The Team elected to perform a review focused on the State's actions to fulfill the requirement found in Stipulation II.B.3.c of the MOU, that "as part of any request for FHWA authorization for funding or other action, the State will provide to the FHWA evidence that the CE processing and any other environmental responsibilities assigned under this agreement have been completed in accordance with this MOU."

This team conducted interviews with the Regional Environmental Managers at each DOT&PF office via teleconference, as well as with the Statewide Environmental Program Manager (in person). In addition, the team interviewed five individuals in the FHWA Alaska Division Office who review and approve requests from DOT&PF for authority to proceed with project actions. The Team also reviewed fifty-seven (57) financial approval actions (that require a Project Information Document [PID] form) from fifty-seven (57) project financial files in the Alaska Division. Usage of the term "PID" or "PID form" in this report refers only to information on page 2 of the form. Based on this assessment, DOT&PF has carried out its assigned responsibilities adequately and in good faith. An outcome of this monitoring is a number of recommendations and corrective actions that the DOT&PF and the FHWA Alaska Division Office should consider implementing in order to improve the effectiveness and efficiency of the State's processing of projects categorically excluded from the requirement to prepare either an environmental assessment or environmental impact statement.

The objectives of the review were to evaluate six (6) performance areas that were formalized as Section 6004 MOU Stipulations:

1. Compliance with governing laws, regulations, and the Section 6004 MOU.

2. Processing projects assigned under the MOU: State identification, documentation, and review of effects.
3. Excluded projects: Determination and documentation of CEs excluded from the CE Assignment Program, and retained by FHWA.
4. Adequate State resources (including provision of financial resources), qualifications, expertise, standards, and training.
5. Effective State quality control.
6. MOU performance monitoring and quality assurance.

The general conclusions resulting from the objectives of the review are:

1. Finding: One (1) PID form did not provide evidence of an environmental document approval for a single purpose authorization as specified in the Preconstruction Manual instructions for the PID.
2. Observation: A MOU stipulation directs that the State provide evidence of CE processing for “any request for FHWA authorization for funding or other action.” Based on information gathered in preparation for this review, the Team recognizes that this MOU stipulation is too broadly written.
3. Observation: The Review Team identified PID Data entry errors.
4. Observation: The Review Team identified errors resulting from a misunderstanding of the PID process.
5. Observation: The Review Team found redundancy in the PID form.
6. Observation: The Review Team found confusion over when a PID is required.
7. Observation: The Review Team noted there was no formal training by DOT&PF staff on the use of the PID.

During the review, the Team identified seven (7) DOT&PF best practices that included:

1. Informal discussions with the FHWA Environmental Program Manager initiated by DOT&PF staff as part of the reassessment process for projects previously excluded from CE assumption as a result of highway realignments.
2. Quarterly QA/QC risk based assessment of project documentation provided by DOT&PF Statewide Environmental Office (SEO) to Regions and follow up actions by SEO.
3. The Statewide process (including as a part of monthly teleconferences) of quickly transmitting guidance on changes to documentation requirements. For example the Regions are allowed to beta test new forms such as revised PID forms.
4. Informal conversations between DOT&PF staff and the Division Environmental Program Manager regarding projects with a long history (initiated before the 326 MOU), to ensure DOT&PF had all relevant information before making a current class of action decision.

5. On several occasions, DOT&PF SEO staff reached out to the Division Environmental Program Manager to clarify how the new designated CEs from MAP-21 would impact projects assignable under the 326 MOU.
6. DOT&PF SEO staff regularly reach out to the Division Office Environmental Program Manager to gain clarification on 6004 program issues.
7. DOT&PF SEO tracks CE information including whether the CE was assumed or not, and if not assumed, the reason why it was excluded, and the CE action approval date.

As a direct result of the January 2015 Compliance Review, the FHWA currently believes the CE assignment under 23 U.S.C. §326 remains an area of medium risk deserving of continued evaluation and monitoring.

## **Background**

Pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) Section 6004, codified in 23 U.S.C. 326, revised in Section 1312 in the Moving Ahead for Progress in the 21st Century Act (P.L. 112-141, MAP-21), the Alaska Department of Transportation and Public Facilities (DOT&PF) assumed the Secretary of Transportation's (Secretary) authorities and responsibilities for determining if a transportation project qualifies for a Categorical Exclusion (CE), listed in 23 CFR 771.117. For assigned projects categorically excluded from the requirement to prepare an Environmental Assessment or an Environmental Impact Statement under the National Environmental Policy Act (NEPA), DOT&PF also assumed the Secretary's authorities and responsibilities for coordination and consultation with Federal resource agencies for all associated Federal environmental laws. These authorities and responsibilities include Endangered Species Act Section 7 informal consultations with the U.S. Fish & Wildlife Service and NOAA National Marine Fisheries Service, Section 106 consultations with the State Historic Preservation Officer and the Advisory Council on Historic Preservation, and coordination with the U.S. Environmental Protection Agency for project-level air quality conformity findings.

For the CE Assignment, the State of Alaska assumed the legal responsibility for its NEPA decisions, and is subject to Federal court jurisdiction. The State waived its 11<sup>th</sup> Amendment sovereign immunity against actions brought by its citizens in Federal court for the purpose of NEPA Assignment. On September 20, 2012, DOT&PF executed a renewed Section 326 MOU with the Federal Highway Administration (FHWA) Alaska Division to implement the CE Assignment Program in Alaska. The MOU outlines specific terms that describe the DOT&PF's new roles and responsibilities under the CE Assignment.

The Section 326 MOU [Stipulation IV(f)(5)] establishes that a CE Assignment Compliance Review in Alaska will be conducted at least every 18 months. This was the fourth Compliance Review that has been conducted of the State's CE assumption Program.

## Purpose and Objective

The overall purpose of this review is to verify the DOT&PF's compliance with the provisions of the 326 MOU, to evaluate the State's performance in carrying out the procedures established for the CE Assignment, and to evaluate the effectiveness of those procedures in achieving compliance. In evaluating the State's compliance with the provisions of the MOU, this review also considers procedures and actions of the FHWA Alaska Division Staff in the project development process. The overall objective is to identify opportunities for enhancing the quality of CE decision-making and develop baseline information for future evaluation.

A key component of the 326 MOU is the six (6) performance areas that the FHWA will use in evaluating the success of the CE Assignment in Alaska. The following performance areas establish the foundation for the objectives of this review:

1. Compliance with governing laws, regulations, and the 326 MOU.
2. Processing projects assigned under the MOU: State identification, documentation, and review of effects.
3. Excluded projects: Determination and documentation of CEs excluded from the CE Assignment Program, and retained by FHWA.
4. Adequate State resources (including provision of financial resources), qualifications, expertise, standards, and training.
5. Effective State quality control.
6. MOU performance monitoring and quality assurance.

The scope of this review focused on the DOT&PF's use of the Project Information Document (PID) to fulfill the requirement found in Stipulation II.B.3.c of the 326 MOU. This stipulation says that, "as part of any request for FHWA authorization for funding or other action, the State will provide to the FHWA evidence that the CE processing and any other environmental responsibilities assigned under this agreement have been completed in accordance with this MOU." In the DOT&PF's October 2013 Corrective Action Plan (CAP) the State indicated that the Project Information Sheet had been revised on October 3, 2013 (and since has been retitled Project Information Document on August 1, 2014). The CAP also indicated that the DOT&PF Statewide Environmental Office had provided guidance to the Regional Environmental Managers on how to correctly implement the revised form.

## Scope and Methodology

The scope of this review relied upon review of project financial records housed in the Division Office and interviews of both FHWA Division and DOT&PF staff. The interview of the DOT&PF Statewide Environmental Program Manager was more extensive than the other interviews in order to assess the State's assumption of MOU responsibilities including the provision of financial and staff resources committed to implement the provisions of the MOU.

The Review Team staff limited its review of project files only to financial folders that are part of the records of the FHWA Alaska Division Office. The Review Team completed interviews of staff of the FHWA Alaska Division Office, the DOT&PF Statewide Environmental Program Manager, and all three Regional Environmental Managers either in person in the FHWA Alaska Division Office or by telephone. Interview questions focused on the process by which DOT&PF staff indicate that a proposed project's environmental requirements have been satisfied as part of an authority to proceed (ATP) to a next step in the project development process. These questions were supplemented to gather information about all six (6) objectives of this review.

The Team's focus on the timely and appropriate provision of information demonstrating that the State has satisfied all environmental requirements specified in the 326 MOU as part of any notice to proceed, defined a universe of approval actions between October 3, 2013 and December 29, 2014. The start date was based on the date, referenced in the State's October 2013 Corrective Action Plan, for the initiation of a newly revised Project Information Document [PID]. The end date is an arbitrarily defined date used to define the universe of actions in order to complete the review work plan. This universe consists of three hundred twenty-three (323) requests for ATP that would have required a PID based on direction from the DOT&PF Preconstruction Manual. This universe includes projects that were assigned and not assigned to DOT&PF under the 326 MOU. According to this manual, PIDs are only required for ATPs that identify one of the following actions:

- Preliminary Engineering through Reconnaissance Study
- Preliminary Engineering through Environmental Document
- Preliminary Engineering thorough Final PS&E
- Right-of-way Appraisal and Acquisition
- Utility Relocation
- Construction

Other actions processed through a Project Agreement Modification that do not require a PID include:

- Final voucher
- Increase or decrease to actual expenditures
- De-obligation of excess funds based on an updated cost estimate that was not the result of a scope or terminus change
- Increase or decrease to an awarded contract amount within ninety (90) days of award
- Advance construction conversion
- Increase to Design or Right-of-way phase within the current ATP based on an updated cost estimate that wasn't the result of a scope or terminus change
- Increase in Construction or Utility Relocation due to:
  - Increased cost of construction administration
  - Quantity overruns and other similarly related construction overruns
  - Errors in the plan quantity estimate
  - Traffic control
  - Police oversight
  - Change orders resulting from minor design changes necessary due to unforeseen field conditions which do not change project scope, environmental commitments, or create potential impacts to historic properties

The Team's goal was to review a manageable number of PIDs that would also provide the ability to extrapolate results to the entire universe of PID development and review process. Given the universe of three hundred twenty-three (323) ATPs the Team determined that a sample that would provide a 90% confidence interval (with a 10% margin of error) would be both manageable and sufficient to extrapolate to the entire universe. The Team utilized the Raosoft sample size calculator ([www.raosoft.com/samplesize.html](http://www.raosoft.com/samplesize.html)) to identify a sample size of fifty-seven (57), that included projects that were assigned and not assigned under the 326 MOU because there was no way to distinguish among financial files without reviewing each. The Team then randomly drew ATP requests from the universe of three hundred twenty-three (323) until fifty-seven (57) ATPs were drawn. The Team then reviewed those randomly selected fifty-seven (57) project financial files at the Alaska Division Office. Of the fifty-seven (57) files reviewed, eighteen (18) were projects not assigned to DOT&PF and thirty-nine (39) were assigned projects. This report only focuses on the results of the review of those thirty-nine (39) files.

The Team's goal for the interviews was to speak with individuals at the DOT&PF who were responsible for entering environmental information on and approving the PID as part of an ATP package and individuals at the FHWA Alaska Division who review and approve ATPs.

At DOT&PF, the Regional Environmental Manager (REM) is the individual responsible in the DOT&PF region to complete page 2 of the PID, which provides the status of project environmental review. The Team interviewed all three DOT&PF REMs. The Team also interviewed the Statewide Environmental Program Manager who is responsible for the DOT&PF's environmental program policy and procedures and general oversight.

At the FHWA Alaska Division office, three individuals (Area Engineers) review ATPs (including the PID), and then make a recommendation to the approving official in the office. The Team interviewed two of those three FHWA Area Engineers. The third individual was unavailable to interview. The primary ATP approving official in the FHWA Alaska Division Office is the FHWA Field Operations Engineer. When that individual is not available to make approvals, the FHWA Bridge and Research Engineer is the approving official. When neither of these individuals is available, the FHWA Statewide Programs Team Leader becomes the approving official. The Team interviewed all three of these approving officials.

In summary, interviews were conducted of the following DOT&PF and FHWA staff:

- DOT&PF Statewide Environmental Program Manager (1)
- DOT&PF Regional Environmental Manager (3)
- FHWA Area Engineer (2)
- FHWA Statewide Programs Team Leader (1)
- FHWA Field Operations Engineer (1)
- FHWA Bridge and Research Engineer (1)

## **Team Members**

Tim Haugh, Environmental Program Manager of the Alaska Division, served as the Review Team Leader. He was responsible for coordinating the Team's activities, keeping the review on schedule and alerting management to any issue that may affect the completion of the review. Tim has a broad understanding of the provisions of the NEPA assumption programs and performed several audits of Caltrans' NEPA assumption program. He is a NEPA project development and Section 4(f) subject matter expert and has extensive knowledge and experience of the environmental program.

Owen Lindauer, FHWA HQ Project Development Specialist serves as this report's lead author who joins the Review Team from the FHWA Office of Project Development and Environmental Review. He brings extensive knowledge of the CE assumption program (permitted by SAFETEA-LU Sec. 6004) provisions in that he has led the development and updating of the CE assumption program guidance and the CE template MOU. He has conducted CE monitoring reviews in Alaska, Utah, and Texas. He has oversight in the implementation of CE assumption in California, Utah, and Texas as well, and brings a national perspective to this program review. He is also a recognized NEPA, Section 106 of the NHPA, and Section 4(f) expert.

David Grachen, FHWA Resource Center Environmental Specialist is a member who joins the Review Team from the Resource Center's Environmental Technical Services Team. He brings extensive knowledge of NEPA program and CE assumption and experience conducting audits of Caltrans' assumption of environmental responsibilities under the pilot program. He has conducted CE monitoring reviews in Alaska, Utah, and Texas. He is also a recognized for his expertise in NEPA project development, Section 4(f), and Section 106.

## Results: Findings and Observations

Information is presented as:

Finding - A statement pertaining to compliance with a regulation, statute, FHWA guidance, policy, or procedures, DOT&PF procedures, or the 326 MOU.

Observation - Circumstances noted where FHWA believes a process or procedure may be improved.

Note - All Findings/Observations will identify a cause and effect.

Corrective Action – An action required to address a deficiency identified in a finding.

Recommendation – The Team’s suggestion on how to improve a process or procedure based on an Observation.

### Finding and Observations from this Monitoring Review

- 1) MOU Stipulation II(B)(3)(c) – as part of any request for FHWA authorization for funding or other action, the State will provide to the FHWA evidence that the CE processing and any other environmental responsibilities assigned under this agreement have been completed in accordance with this MOU.**

#### Finding

The Review Team found that 100% of the ATP files reviewed contained a PID. All but one of the PID forms in those files contained adequate evidence that the CE processing and other environmental responsibilities assigned under the MOU were completed. This one PID form submitted with a single purpose authorization request did not provide an environmental document approval date as specified in the Preconstruction Manual instructions for the PID. The DOT&PF staff member should have completed the PID form according to the instructions and provided that information to FHWA when making a request for an ATP. By not doing this, FHWA staff inappropriately approved the ATP. The cause of this issue may be a misunderstanding of what information is needed to complete the PID. There also appears to be a misunderstanding on the part of the FHWA ATP reviewers on what information is required for ATP approval. To correct this problem the State could implement joint training for DOT&PF environmental staff who fill out and approve the PID form and for FHWA ATP review staff.

## Observation

As part of the planning for this review, the Team considered the scope of actions that DOT&PF requests through ATP submittals. Based on the DOT&PF procedures which identify actions that require evidence (submittal of a PID) of NEPA compliance prior to approval of an ATP, the Team limited its review only to those actions (see pages 7 & 8 above).

However, in learning that a large subset of actions submitted for modification and approval do not require evidence of CE processing, the Team noted that the stipulation above directs that the State provide evidence of CE processing for “any request for FHWA authorization for funding or other action.” Based on information gathered in preparation for this review, the Team recognizes that this MOU stipulation is too broadly written.

The MOU should only direct the State to provide FHWA with evidence of CE processing and environmental compliance when such information is necessary for FHWA to consider in making an ATP approval. The cause of this overly broadly written stipulation may have resulted from confusion during the development of the original MOU related to when environmental compliance information is needed for an ATP approval. The effect is that the State may not technically be in compliance with the terms of the MOU. The Team is not going to make a finding based on that technicality. We recommend the FHWA revise the language in Stipulation II(B)(3)(c) to limit the actions the State must provide evidence of CE processing and environmental compliance to only actions where such evidence is necessary for ATP approval. FHWA might consider identifying the list of actions from the DOT&PF Preconstruction Manual that require a PID.

### **2) MOU Stipulation IV(E)(2) – At a minimum, the State shall monitor its processes relating to project determinations, environmental analysis, and project file documentation, and check for errors and omissions. The State shall take corrective action as needed.**

Stipulation IV(E)(2) requires the State to monitor the procedures it develops to implement the provisions of the MOU, to check for errors and omissions, and to take corrective actions as needed. The Team considers this monitoring provision of the MOU to also include consideration whether errors could result from confusion among DOT&PF staff on how to implement processes.

## Observations

- PID Data entry errors.

Based on review of PID forms attached to DOT&PF requests for ATP, and comparing these forms with the instructions for use of the form in the DOT&PF Preconstruction Manual, the Team identified seven (7) PID forms of thirty-nine (39) [18%] reviewed that had data entry errors. The data entry errors consisted of identifying the incorrect date for environmental document approval, not checking a box to reflect an approved document when one was necessary and entering information only on one block for date of environmental document approval when that date should have been recorded in both blocks 5 and 6. The cause of the data entry errors may be due to the design of the PID form or confusion among DOT&PF staff in how to properly complete the form (especially regarding whether a date is required in both PID blocks 5 and 6 due to ambiguous instructions), or both. A separate observation addresses the design of the PID form below. The PID forms should be completed without errors or omissions. To correct this problem the State could implement formal training for DOT&PF environmental staff that fill out and approve the PID form.

- Misunderstanding of the PID process.

The Team identified two instances of errors on the PID, based on expectations set forth in how to properly complete the PID in the Preconstruction Manual. The errors were that “N/A” was entered under environmental document approval date when another part of the form indicated that the 11/6/12 Chief Engineer’s directive #1 approval applied. The date that this determination was made should have been entered into the Approved Document section instead of “N/A”. These errors differ from data entry errors because the Team considers it to result from confusion in the project development process, as well as how to properly process the PID form. Confusion among DOT&PF staff in how to process the PID form may cause delay in the timely processing of requests for approval. The cause of this problem may be inadequate training. To correct this problem the State could implement formal training for DOT&PF environmental staff that fill out and approve the PID form, with a focus on the process to complete the PID and how this process fits within the larger context of State approval requests made to FHWA.

- Redundancy in the PID form.

The Preconstruction Manual’s instructions on how to complete the PID indicate that when a project has an approved environmental document and a re-evaluation has been completed, the REM must enter the environmental document approval date in two places. One is in block 5, Approved Document, and the other place is in block 6, Re-evaluation. The team identified five (5) instances out of thirty-nine (39) [13%] PID forms reviewed where the environmental document approval date was not entered in both places. DOT&PF staff should have completed the PID forms according to the Preconstruction Manual’s instructions. However, the Team recognizes that the PID form

has redundancy and that the instructions to complete the form appear to require the REMs to enter the same information in blocks 5 and 6. The Team believes that the redundancy may be a source of confusion to both DOT&PF and FHWA staff. The Team acknowledges that there may be value in retaining this redundancy in approval dates. DOT&PF staff should assess this redundancy. To correct this problem the State could revise the PID form or revise the instructions on how to complete the PID form, or institute training to DOT&PF staff to ensure blocks 5 and 6 are correctly completed.

- Confusion over when a PID is required.

Based on interviews of both DOT&PF and FHWA Alaska Division staff, there is confusion regarding when a PID is required as part of a request for ATP. Individuals from both these offices provided answers that ranged from a PID only being required for an ATP for construction, to one being required for every ATP. The Team acknowledges that only one individual from DOT&PF identified the Preconstruction Manual Instructions on how and when to fill out a PID. The Preconstruction Manual PID instructions clearly identify the ATP actions where the submittal of a PID is required. There should be a shared understanding among State and FHWA staff on when a PID is required. The cause of this issue could be the absence of formal training or that staff are unfamiliar with the instructions in the Preconstruction Manual. The State could implement PID training jointly with the FHWA Alaska Division staff that review and approve ATPs, with emphasis on the PID instructions.

- No formal training by DOT&PF staff on the use of the PID

FHWA acknowledges that the State has responsibly revised the process by which environmental compliance information is transmitted to FHWA at the time it makes a financial request or request for approval. The State has revised the PID form several times but, based on information gained through interviews of DOT&PF staff, no formal training to explain the revisions or process changes has occurred. The Statewide Environmental Office did conduct informal training, which, based on information gained through interviews, may not have been adequate. The cause for not providing formal training is unknown. The effect is that the team found evidence, both in the review of the PID forms and through interviews, of confusion in how to properly complete this form. The Team recommends that DOT&PF develop and deliver formal training on the PID form and how it fits into the process whereby both State and FHWA review requests for financial approvals. The delivery of this training should include staff of the DOT&PF who prepare and approve the PID form, and FHWA Alaska Division Office staff who review the form.

## Successful Practices

The review team observed several successful practices taken by the DOT&PF that have improved their overall stewardship of the NEPA process. We saw evidence of good practices that were only reflected in a single project and others that were observed on multiple projects and appear to be successfully integrated into the overall project development process. The specific successful practices we observed include:

1. Informal discussions with the FHWA Environmental Program Manager initiated by DOT&PF staff as part of the reassessment process for projects previously excluded from CE assumption as a result of highway realignments.
2. Quarterly QA/QC risk based assessment of project documentation provided by SEO to Regions and follow up actions by SEO.
3. The Statewide process (including as a part of monthly teleconferences) of quickly transmitting guidance on changes to documentation requirements. For example the Regions are allowed to beta test new forms such as revised PID forms.
4. Informal conversations between DOT&PF staff and the Division Environmental Program Manager regarding projects with a long history (initiated before the 326 MOU), to ensure DOT&PF had all relevant information before making a current class of action decision.
5. On several occasions, DOT&PF SEO staff reached out to the Division Environmental Program Manager to clarify how the new designated CEs from MAP-21 would impact projects assignable under the 326 MOU.
6. DOT&PF SEO staff regularly reach out to the Division Office Environmental Program Manager to gain clarification on 6004 program issues.
7. DOT&PF SEO tracks CE information including whether the CE was assumed or not, and if not assumed, the reason why it was excluded, and the CE action approval date.

## Conclusion

This report summarizes the results of the fourth compliance review of the State's assumption of environmental responsibilities under the 326 MOU. The Review Team has evaluated the process by which the State communicates information about the NEPA status for CE projects it has assumed. This conclusion also identifies one finding and several new observations.

Based on review of project files, information gained from interviews with FHWA Alaska Division Office staff, the Statewide and Region offices of DOT&PF, and facts gathered by the Team since the last review, the Review Team concludes that the State is substantially in compliance with the provisions of the Section 326 MOU.

The Review Team has made a number of new observations that should be utilized by the State to improve the efficiency and effectiveness of procedures, documentation, and decision making related to this assignment of CE responsibilities.

The overall purpose of the review was to verify DOT&PF's compliance with the provisions of the Section 6004 MOU, to evaluate the State's performance in carrying out the procedures established for the CE Assignment, and to evaluate the effectiveness of those procedures in achieving compliance. This conclusion summarizes, in Table 1, the outcomes of the six (6) objectives used for this compliance review. The appendix presents the results of the review of the thirty-nine (39) PID forms.

Table 1. Review Objectives (1 through 6) with Review Status

Objective	2015 Review Status
1-Comply with governing laws, regulations, and the Section 6004 MOU.	The State is in compliance.
2-Processing projects assigned under the MOU: State identification, documentation, and review of effects	The State is in compliance.
3- Excluded projects: determination and documentation of CEs excluded from the CE Assignment Program, and retained by FHWA	The State is in compliance.

4- Adequate State resources (including provision of financial resources, qualifications, expertise, standards, and training	The State is in compliance.
5-Effective State quality control	The State is in compliance.
6- MOU performance monitoring and quality assurance	The State is in compliance.

## Appendix A

Excel Spreadsheet: "Master File Review Spreadsheet" following this page.

Federal Project Number	State Project Number	Region or Statewide	Does the latest ATP include a PID	Anticipated COA					Approved Document Section			Re-evaluation Section			Was the PID completed in accordance with the PreCon Manual	Does ATP pkg provide sufficient evidence for completion of environmental responsibilities	Type of ATP Request								Comments	
				Unknown COA	CE Assigned	CE FHWA	EA/EIS	None	Approval line filled out	PCE box checked	None checked	Env Doc Approval line	Re-eval line	None checked			PE to Recon	PE to Env Doc	PE to Final Design	One step	ROW	Utility Relo	Construction	Single-purpose authorization		Scope change
506(003)	53942	CR	Y		Y					Y			Y	N	Y						Y					Data entry error in Block #5 of PID. Also Block #5 / #6 issue.
85(13)	55505	CR	Y			Y			Y				Y	N	Y								Y			Misunderstanding of process. N/A entered in Block #5 of PID instead of date "c" list CE was approved in attached email.
0001(523)	56018	CR	Y		Y					Y			Y	Y	Y					Y	Y					
87(001)	56399	CR	Y			Y				Y			Y	Y	Y					Y	Y					
0001(501)	57092	CR	Y		Y					Y			Y	Y	Y					Y	Y					
0001(494)	57225	CR	Y		Y					Y			Y	N	Y								Y			Misunderstanding of process. CED#1 used, but no date entered in Block #5.
0001(500)	57607	CR	Y		Y					Y			Y	Y	Y					Y	Y					
0001(504)	57689	CR	Y		Y					Y			Y	Y	Y					Y	Y					
85(002)	57931	CR	Y			Y				Y			Y	Y	Y					Y	Y					
0001(502)	58003	CR	Y		Y					Y			Y	N	Y											Block #5 / #6 issue.
0001(534)	58404	CR	Y		Y				Y				Y	N	Y											Incorrect data entry in Block #1 on PID.
496(014)	58481	CR	Y		Y					Y			Y	Y	Y					Y	Y					
540(010)	58496	CR	Y		Y				Y	Y		Y	Y		N	Y										Data entry error in Block #5 of PID.







## Appendix B

Example of a Project Information Document following this page.

**PROJECT INFORMATION DOCUMENT**

**PROJECT NAME:** \_\_\_\_\_

**AKSAS #** \_\_\_\_\_ **Federal Project #** \_\_\_\_\_ **Federal Route #** \_\_\_\_\_

**CFDA #** \_\_\_\_\_ **STIP Need ID #** \_\_\_\_\_

*If project designed under a separate number, note number here:* \_\_\_\_\_

**FIPS PLACE CODE & COUNTY CODE #:** \_\_\_\_\_ **IMPROVEMENT TYPE:** \_\_\_\_\_

**SAFETY RELATED** \_\_\_\_\_ *If safety related provide infrastructure and ownership info below*

Infrastructure  Non-Infrastructure  Ownership: State  Local  Other

**CDS ROUTE # & MILEPOINTS:** \_\_\_\_\_ **RURAL**  **URBAN**

**FUNCTIONAL SYSTEM:**

Freeways & Expressways  Major Collector  No Functional Class   
Other Principal Arterial  Minor Collector   
Minor Arterial  Local

**NBI BRIDGE NUMBER(S):** \_\_\_\_\_

**ATP LEVEL:** Recon  Env Doc  Final PS&E  ROW  Utility  Construction  HP&R   
Relocation

**REASON FOR PID** New ATP  Scope and/or Termini Change

**PROJECT COST ESTIMATES (shown in total dollars)**

		<b>WHAT YEAR IN PLAN?</b>
* P.E. thru Reconnaissance Study	_____	FFY _____
* P.E. thru Environmental Document	_____	FFY _____
* P.E. thru Final PS&E	_____	FFY _____
* R.O.W.	_____	FFY _____
* Utility Relocation	_____	FFY _____
* Construction	_____	FFY _____
* Planning ___ Research ___ Other ___	_____	FFY _____

**FEDERAL FUNDING SOURCE** FHWA  FTA  DENALI  Other (specify) \_\_\_\_\_

**PURPOSE OF PROJECT:**  
\_\_\_\_\_  
\_\_\_\_\_

**DETAILED SCOPE:**  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**PROJECT TERMINI OR LOCATION & LENGTH:**  
\_\_\_\_\_  
\_\_\_\_\_

**DOT&PF Project Engineering Manager** \_\_\_\_\_

**Date** \_\_\_\_\_

**PROJECT INFORMATION DOCUMENT**

AKSAS # \_\_\_\_\_ PROJECT NAME: \_\_\_\_\_

**STATUS OF ENVIRONMENTAL PROCESSING**

**Anticipated Class of Action**

Unknown Class of Action

\_\_\_\_\_ 1. The amount of information is insufficient at this time to determine the level of environmental document. (Initial ATP can only be authorized for PE through Environmental Document.)

The class-of-action determination is expected within:

- 0 - 3 months
- 3 - 6 months
- more than 6 months

Categorical Exclusion (CE)

- Assignable under Section 6004
- Non-assignable under Section 8004

\_\_\_\_\_ 2. The project qualifies as a categorical exclusion per 23 CFR 771.117(c) and an Expedited CE Documentation Form is required.

\_\_\_\_\_ 3. The project qualifies as a categorical exclusion per 23 CFR 771.117(c) or (d); and a CE Documentation Form is required. (Applicable for initial ATP for PE through Environmental Document, unless the One-Step Process is used.)

Environmental Assessment (EA) or Environmental Impact Statement (EIS)

\_\_\_\_\_ 4. The project qualifies as either an environmental assessment (EA)  per 23 CFR 771.119, or as an environmental impact statement (EIS)  per 23 CFR 771.123. (Initial ATP can only be authorized for PE through Environmental Document.)

**Approved Document**

\_\_\_\_\_ 5. The project's environmental document was approved as a CE , FONSI , or ROD  on \_\_\_\_\_ (mm/dd/yy). If the environmental document was approved as a Programmatic CE, which of the following agreements was used:

- Chief Engineers Directive of 11/6/12 approval #1 (6004 assigned)
- Chief Engineers Directive of 11/6/12 approval #2 (8004 assigned)
- PCE of 4/13/12 between DOT&PF and FHWA for certain "c" list CE's (non-assigned)
- PCE of 4/13/12 between DOT&PF and FHWA for "e" and "d" list activities (non-assigned)
- PCE of 4/13/12 between DOT&PF and FHWA for Ferry Vessels (non-assigned)

**Re-evaluation**

\_\_\_\_\_ 6. The project's environmental document (CE , FONSI , or ROD ) was approved on \_\_\_\_\_ (mm/dd/yy), and:

- An Expedited Re-evaluation Approval Form was approved on \_\_\_\_\_ (mm/dd/yy) per 23 CFR 771.123(c).
- An Environmental Re-evaluation Form was approved on \_\_\_\_\_ (mm/dd/yy) per 23 CFR 771.128.

\_\_\_\_\_  
DOT&PF Regional Environmental Manager

\_\_\_\_\_  
Date

Approved:



*Sandra A. Garcia-Aline*  
*Division Administrator*  
*Alaska Division, FHWA*

*5/29/15*

Date



Report prepared by:

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