

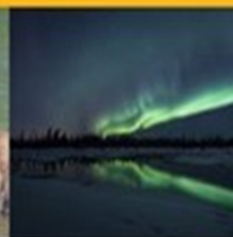


Alaska Department of



Transportation & Public Facilities

Keep Alaska Moving through service and infrastructure



National Environmental Policy Act (NEPA) **PROCEDURES MANUAL TRAINING**

MODULE 11A

QUALITY ASSURANCE AND QUALITY CONTROL

FOR ENVIRONMENTAL ASSESSMENTS

2021 CLASSROOM GUIDE





Draft Document Development

- Technical Reports (QA during development, QC formalized)
- Public and Agency Involvement
- Draft Environmental Document
 - Preparation
 - Review
 - Certification
 - Legal Review



First, we will discuss Quality Assurance and Quality Control through the development of the draft Environmental Assessment. We will cover technical reports, public and agency involvement and the draft environmental document, including preparation, review, certification and legal review.



Technical Reports

Quality Assurance (QA):

- ✓ Incorporated during development
- ✓ Coordinated through project team, support groups, and subject matter experts



Quality Control (QC):

- ✓ Confirm accuracy
- ✓ Ensure coordination is complete
- ✓ Ensure regulatory and DOT&PF standards are met
- ✓ Verify consistency
- ✓ Document comments and changes in project file



During early project development, the project development team identifies the necessary technical studies to support development of the environmental document. Quality Assurance (QA) is incorporated into the development of the technical reports through coordination between the team, support groups, and subject matter experts, as appropriate, regarding methodologies and approaches for the technical studies.

Required technical reports undergo a technical report Quality Control (QC) review, and can be conducted by:

- A member of the project development team who was not directly involved in the report preparation
- A peer reviewer
- Another subject matter expert, depending on the resource area

Technical report QC review should:

- Confirm adequacy and accuracy of the report

- Ensure appropriate coordination and regulatory requirements are met
- Ensure applicable regulatory requirements and DOT&PF standards are met
- Verify clarity, grammar, and internal consistency of the information
- Document review comments and responses and place in the project file as evidence of the review and to communicate any necessary report changes



Public and Agency Involvement

Quality Assurance (QA):

- ✓ Development of public involvement materials
- ✓ Responses to comments
- ✓ Captured in summary/report



Quality Control (QC):

- ✓ Confirm accurate record in summary/report
- ✓ Accuracy of responses to comments
- ✓ QC record is in project file



Prior to public and agency involvement activities, Quality Assurance (QA) review occurs through the collaborative development of public notices, scoping letters/emails, meeting presentation materials and handouts, and through the development of any responses to comments by the project development team. Following the public and agency involvement activities including scoping efforts, meetings, and public hearings, the Environmental Impact Analyst, consultant, or other team member completes a scoping, meeting, or hearing summary/report. The team conducts the Quality Control (QC) review of the summary/report to ensure the scoping activity, meeting, or hearing is accurately recorded, and reviews participant comments and team responses for consistency and accuracy. The QC review also confirms the summary/report includes scoping letters/emails, and meeting or public hearing materials. Once the review is completed, the summary/report and any team comments are included in the region project file to document the QC review.



Preparation of the Draft Environmental Document

Quality Assurance (QA):

- ✓ Emails, phone notes, meeting notes
- ✓ Collaborative discussions
- ✓ Included in project file
- ✓ Consistent with supporting attachments



Quality Control (QC):

- ✓ Reviews by regional staff
- ✓ Reviews by SEO
- ✓ Reviews by LAW, if necessary



Quality Assurance (QA) occurs through collaboration and project meetings during the preparation of the draft environmental document. Evidence of QA includes emails, phone conversation notes, and meeting notes summarizing collaborative discussions involving project development team members about any aspect of the draft document development (i.e., alternatives, resource areas, methodologies). The Environmental Impact Analyst is responsible for ensuring that evidence of this process is included in the region project file, and that the draft environmental document is consistent with any technical reports prepared to support the environmental document.

Quality Control (QC) occurs through a series of QC review steps that include region, SEO, and LAW review. The draft environmental document is only made available for publication after QC is complete, the legal review is complete, and SEO receives the region preconstruction engineer recommendation for publication.



Draft Environmental Document Review

Quality Assurance (QA):

- ✓ Emails, phone notes, meeting notes
- ✓ Collaborative discussions
- ✓ Included in project file
- ✓ Consistent with supporting attachments



Quality Control (QC):

- ✓ Review by regional staff
- ✓ Review by SEO
- ✓ Review by LAW, if necessary



- [QA/QC Plan](#)
- [Document Review Checklist](#)
- [Comment Response Matrix](#)



Email templates are in 2.4.7 of the *QA/QC Plan*



The draft environmental document review is a QC step performed by the project development team members to determine if the document is ready for legal review and public availability approval recommendation. The review is documented on the *QA/QC Environmental Document Review Checklist* and included in the project file. Review comments and responses may be documented on the optional *Environmental Document Review Comment and Response Matrix*, or other similar format. The *QA/QC Environmental Document Review Checklist* and the *Environmental Document Review Comment and Response Matrix* can be downloaded from the SEO website. The team members review the draft environmental document and will consider the following QC review elements:

- Accuracy
- Adequacy
- Completeness
- Compliance with CEQ and FHWA NEPA regulations (40 CFR 1508 and 23 CFR 771) and DOT&PF standards and procedures
- Conciseness
- Consistency within and between the environmental document, supporting appendices,

and technical reports

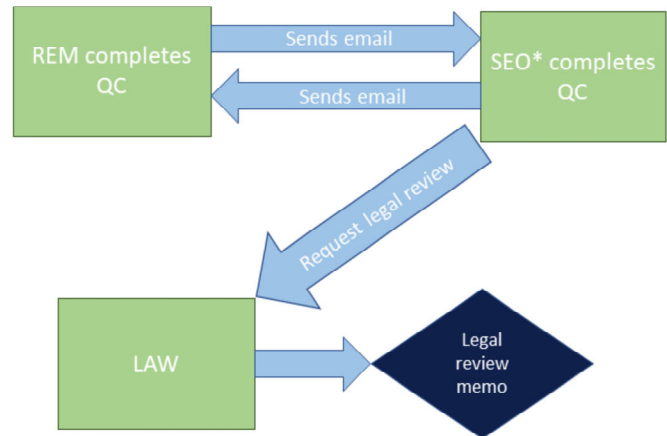
- Conformance to all NEPA requirements and applicable guidance, policies, and procedures
- Errors and omissions
- Readability

Project development team member review comments and associated responses/resolutions are documented in writing and placed in the region project file to document the QC review.



Legal Reviews

- ❖ Prior to public review
- ❖ May require multiple reviews
- ❖ Confidential communications
- ❖ Non-confidential memo



The Statewide Environmental Office must request the Department of Law to conduct legal review of Draft Environmental Assessments. The primary goal of legal review is to assess the document for compliance with legal requirements. The environmental document must undergo legal review prior to approval for public review. More than one legal review may be requested including a review of the revised documents. For controversial or complex projects, the Department of Law may require that all legal comments be appropriately addressed before concluding the legal review and issuing a memorandum of completion. Communications with the Department of Law and legal advice are confidential and are maintained in a separate file for privileged communications, which is not available for consultant, public, or agency distribution or review. The Department of Law memorandum documenting completion of legal review is included in a non-confidential folder of the project file.

The Draft Environmental Assessment must be provided to the Department of Law for review and comment upon the completion of the Regional Environmental Manager and Statewide Environmental Office staff member QC reviews. Following the Regional Environmental Manager and Statewide Environmental Office staff member QC review, the Statewide Environmental Office staff member submits the Draft Environmental Assessment and associated documents to the Department of Law for legal review.



Approval for Public Availability

Environmental Assessment (EA):

- ✓ REM QC Review
- ✓ SEO QC Review
- ✓ LAW legal review
- ✓ Preconstruction Engineer Recommendation
- ✓ Statewide Environmental Program Manager approval (or delegate)



In order for a Draft Environmental Assessment to be approved for public availability, the Regional Environmental Manager, the Statewide Environmental Office, and the Department of Law reviews must be complete and the Statewide Environmental Office must receive the region preconstruction engineer recommendation for public availability. The Statewide Environmental Program Manager is authorized to sign an approval for public availability of the Draft Environmental Assessment or may delegate signature authority to the NEPA Program Manager.



Final Document Development

- Final Environmental Document (EA and FONSI)
 - Preparation
 - Review
 - Certification
 - Legal Review or Legal Sufficiency Review
 - Approval
- Federal Register Notices



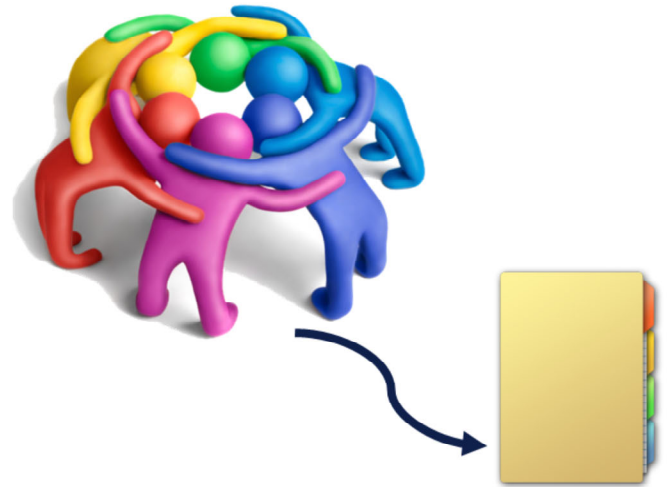
Now, we will discuss Quality Assurance and Quality Control through the development of the final environmental document. We will cover the final environmental assessment and Finding of No Significant Impact, including preparation, review, certification, legal review or legal sufficiency review, and approval. We will also discuss federal register notices.



Preparation of the Final Environmental Document

Quality Assurance (QA):

- ✓ Emails, phone notes, meeting notes
- ✓ Collaborative discussions
- ✓ Included in project file
- ✓ Consistent with supporting attachments



QA occurs during preparation of the final environmental document, like preparation of the draft environmental document. Evidence of QA includes emails, phone conversation notes, and meeting notes summarizing the collaborative discussions involving project team members about any aspect of the final document. The Environmental Impact Analyst is responsible for ensuring evidence of this QA process is included in the project file, and that the final environmental document is consistent with any reports prepared to support the environmental document.



Final EA and FONSI

Environmental Assessment (EA):

- ✓ Coordination complete
- ✓ Comments addressed
- ✓ Updates to EA
- ✓ Accurate

Finding of No Significant Impact (FONSI):

- ✓ Clear decision
- ✓ Accurate and consistent
- ✓ Environmental commitments and mitigation
- ✓ Resolution of comments
- ✓ EA and FONSI are consistent

Quality Control (QC):

- ✓ Review by regional staff
- ✓ Review by SEO
- ✓ Review by LAW, if necessary
- ✓ EA and FONSI Approval



• [QA/QC Plan](#)



Email templates are in 2.4.7 of the *QA/QC Plan*

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Final EA and FONSI

For an EA, if the environmental decision is likely to be a FONSI, the FONSI may be submitted to the SEO for review along with the Final EA and the region preconstruction engineer request for FONSI. The REM and SEO staff member each perform a QC review of the Final EA or FONSI to confirm that it meets NEPA requirements and DOT&PF standards, and is ready for legal review and SEO approval.

The REM and SEO staff member each review the Final EA to verify the following:

- All consultation and coordination requirements have been completed and documented
- All public and agency comments have been appropriately addressed
- The EA has been updated and modified as necessary
- Any updated information has been accurately incorporated into the Final EA

The REM and the SEO staff member will review the FONSI for the following environmental decision document QC review elements:

- Clarity in describing the decision
- Accuracy and consistency of project information
- Accuracy in description and documentation of final agreed-upon environmental commitments and mitigation requirements
- Final resolution of any public or agency comments
- Consistency between the Final EA and FONSI

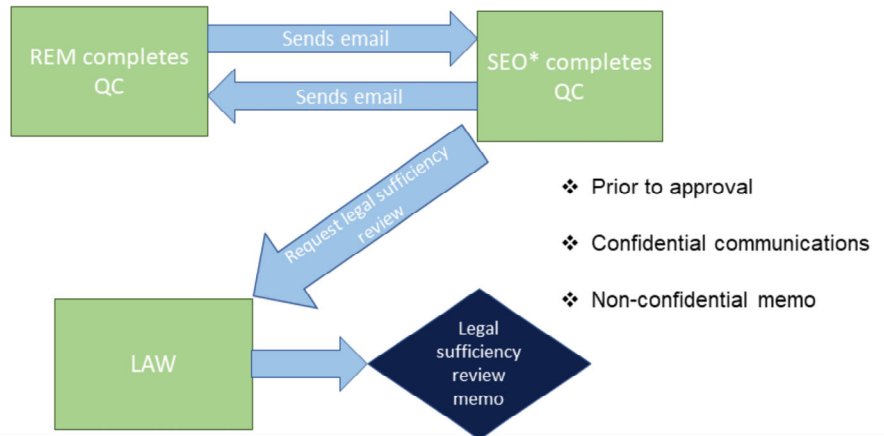
Following QC review, the REM and SEO staff member each complete the certification process as outlined in the QA/QC Plan to document completed QC review of the Final EA or FONSI. This certification email is provided by the REM to the SEO staff member, and then by the SEO staff member to the REM, as evidence that region and SEO QC reviews of the Final EA or FONSI are successfully completed and the document is ready for legal review and final approval. The Statewide Environmental Program Manager is authorized to sign an approved Final EA and FONSI or delegates signature authority to the NEPA Program Manager.



Legal Sufficiency Review

Required for all:

- Individual Section 4(f) Evaluations
- EAs and FONSI's relying on Statute of Limitations Notice [23 USC 139(I)]



Legal sufficiency review is required for any Individual Section 4(f) evaluation and all Final EAs or FONSI's relying on a Statute of Limitations Notice prepared per 23 U.S. Code 139(I). Communications with the Department of Law and legal advice are confidential and are maintained in a separate file for privileged communications, which is not available for consultant, public, or agency distribution or review. When all legal comments have been appropriately addressed, the Department of Law provides a memorandum documenting that the legal sufficiency review has been completed. The Department of Law memorandum documenting completion of the legal sufficiency review is included in a non-confidential folder of the project file. The Statewide Environmental Program Manager cannot approve a Statute of Limitations Notice for a Final EA and FONSI until it has been determined to be legally sufficient.



Final Environmental Document Approval

Environmental Assessment (EA):

- ✓ REM QC Review
- ✓ SEO QC Review
- ✓ LAW legal review
- ✓ Preconstruction Engineer Recommendation
- ✓ Statewide Environmental Program Manager approval (or delegate)



The FONSI may be submitted to the SEO for approval along with the Final EA. If the documents are submitted separately to the SEO, the preparer of the Final EA will prepare a FONSI for SEO review and approval after the REM and SEO staff member determines that no significant impact will result from the proposed action. The REM and SEO staff member each perform a QC review of the Final EA and FONSI to confirm that it meets NEPA requirements and DOT&PF standards, and is ready for final approval. The Statewide Environmental Program Manager is authorized to sign an approved Final EA and FONSI or delegates signature authority to the NEPA Program Manager.



Environmental Decision Notice of Availability

Distribution:

- Local newspapers
- Alaska Online Public Notices
- Mail and/or email
- Other methods, as appropriate



Available at:

- Online
- Local libraries
- DOT&PF region and SEO offices
- By request
- Federal Register, if necessary
- Other locations, as appropriate

After the FONSI is approved, or concurrent with the SEO review, the region will prepare a notice of availability of the decision document for SEO approval. After SEO approval, the region will issue DOT&PF's notice of availability of the FONSI to the public and appropriate federal, state, and local agencies (23 CFR 771.121(b)) by the following methods:

- In any local newspapers
- In the Alaska Online Public Notices
- By mail or email
- By other appropriate methods

The decision document will also be made available to the public as follows:

- By request
- Online
- At any local libraries
- At DOT&PF region and SEO offices
- At other appropriate locations

If you are relying on a statute of limitations notice, it must be posted in the *Federal Register* through FHWA or United States Environmental Protection Agency because only federal agencies may publish notices in the *Federal Register*. The draft notice will be prepared by the region project development team for REM review and transmittal to SEO. SEO will review the draft notice prior to requesting the required legal sufficiency review and

determination from the Department of Law, as described in a previous slide. After region, SEO, and LAW reviews are complete, SEO forwards the draft notice to FHWA for publishing in the *Federal Register*.



Module Review – Environmental Assessments and Findings of No Significant Impact

Module 11: What You've Learned...



- QA and QC steps through development of the draft and final Environmental Assessment
- The process for legal reviews and legal sufficiency reviews
- The steps required for public distribution of draft and final Environmental Assessments and Findings of No Significant Impact



Return to the T2 Online Training



This concludes the Environmental Assessment Process of the QA/QC Module of DOT&PF's Environmental Procedures Manual Training Program.

Please navigate to the T2 Online Training to complete the QA/QC Module and to take the Module Quiz.