



NEPA Deliverables Quality Plan

November 2024

ODOT is an Equal Employment Opportunity and Affirmative Action Employer.

This information can be made available in alternative format by contacting ODOT's Environmental Section at ENVAdminsupport@odot.oregon.gov.

ODOT does not discriminate on the basis of disability in admission or access to our programs, services, activities, hiring and employment practices. Questions: 1-877-336-6368 (EEO-ODOT) or through Oregon Relay Service at 7-1-1.

Oregon Department of Transportation

Statewide Project Delivery Branch – Engineering & Technical Services Branch

Project Delivery QA/QC Program

4040 Fairview Industrial Dr. SE

Salem, Oregon 97302-1142

503-986-7130

ODOTQualityProgram@odot.oregon.gov

[Website](#)

Table of Contents

Table of Contents	ii
1. NEPA Deliverables Quality Management	5
2. Quality and Technical Standards	6
2.1. Statewide Project Delivery Quality Standards.....	6
2.2. Environmental Quality Standards.....	6
2.3. NEPA Deliverables Quality Standards	6
3. Roles and Responsibilities	7
3.1. PCE and CE Roles and Responsibilities.....	7
3.2. EA/EIS Roles and Responsibilities.....	8
3.3. ODOT Work Products.....	10
3.4. Outsourced Work Products	10
4. Quality Control	12
4.1. Quality Control Milestones.....	12
4.2. Quality Control Reviews and Documentation.....	12
4.2.1. EA and EIS Deliverables.....	16
4.2.2. Technical Competency.....	23
4.3. Interdisciplinary QC Review	24
4.4. Software, Tool, and Data Validation	24
4.5. Quality Control Document Storage.....	24
4.6. Quality Control Communications	25
5. Quality Assurance	26
5.1. Quality Assurance Review Process	26
5.1.1 PCE and CE Deliverables.....	26
5.1.2 EA/EIS Deliverables.....	27
5.2. Quality Assurance Document Storage.....	28
5.3. Quality Assurance Communications	28
Appendix A - Glossary	29

Revision History (the current revision is first entry)

Release Date	Change made by	Section(s) Updated	Summary of what, why changed
November 2024	Melanie Ware, NEPA Program	All	Initial version.

1. NEPA Deliverables Quality Management

This quality plan applies to all National Environmental Policy Act (NEPA) deliverables where Federal Highway Administration (FHWA) is the Lead Agency and ODOT is responsible for the NEPA process. This includes deliverables produced by ODOT staff or consultants.

Where appropriate, this quality plan describes specific quality assurance (QA) and quality control (QC) activities for projects that meet the criteria for Categorical Exclusion (CE) classification (i.e., CEs and Programmatic Categorical Exclusion Agreement projects, referred to as PCEs) and projects that require an Environmental Assessments (EA)/Findings of No Significant Impact (FONSI) or Environmental Impact Statement (EIS)/Record of Decision (ROD), including revised and supplemental EAs/EISs, referred to collectively as “EA/EIS documents” throughout this quality plan.

Quality in project delivery is the degree to which a product, service, or deliverable conforms with established project and design requirements, satisfies its intended purpose, and meets the customer’s requirements and expectations. Quality is the result of a cooperative partnership between the providers of project development services (engineering services and technical reports) and QA. Those providing project development services must implement QC to ensure products and services meet customer requirements and expectations. Those responsible for QA, review the process to confirm that the quality management efforts are achieving desired results. The quality management system efforts foster continuous improvement in the ongoing quest to meet customer expectations, provide high quality engineering and technical services, and make efficient use of resources.

2. Quality and Technical Standards

2.1. Statewide Project Delivery Quality Standards

The [ODOT Project Delivery QA/QC Program website](#) provides an overview of the ODOT Project Delivery QA/QC Program and access to the quality standards of practice. The Project Delivery Quality Program Manual can be found there, as well as a listing of the quality plans and guidance documents, including the region technical center quality plans, the technical discipline quality plans, and the transportation project management statewide quality plan. There is also a listing of the associated quality forms and checklists.

2.2. Environmental Quality Standards

The NEPA Program is part of ODOT's Environmental Section, which conducts business in accordance with all applicable federal, state, and local laws. Quality management for environmental work is often guided by ODOT's regulatory and permitting relationship with federal and state agencies. For example, programmatic agreements with FHWA specify certain QA and QC responsibilities and place limits on the types of work that can be outsourced.

The ODOT Environmental Quality Control Program [website](#) provides an overview of the Environmental Section Quality Program and access to the quality standards of practice. Discipline-specific QC information can be found there, including a listing of quality plans and guidance documents and associated deliverable templates, quality forms and checklists for technical evaluations that support NEPA documents.

2.3. NEPA Deliverables Quality Standards

The NEPA process and documentation for each class of action is required to comply with the Council on Environmental Quality (CEQ) NEPA implementing regulations [[40 CFR Parts 1500-1508](#)], the FHWA *Environmental Impact and Related Procedures* found in [23 CFR Part 771](#). The direct standards by which the quality of NEPA deliverables are evaluated are included in the [ODOT NEPA Manual](#)¹.

When a supporting document from a technical discipline is required as part of the NEPA process, the supporting document is subject to the quality standards of practice, including the statewide discipline quality plan, applicable to that document (see ODOT Environmental Quality Control Program [website](#)).

¹ As of October 2024, the ODOT NEPA Manual is only partially complete. Where a section of the manual is still being developed, the applicable federal, state, and local regulations and standards should be referenced.

3. Roles and Responsibilities

The roles and responsibilities for implementing NEPA deliverable quality management are described in this section.

3.1. PCE and CE Roles and Responsibilities

Table 1 lists the primary quality management roles and responsibilities of ODOT and FHWA personnel involved in the preparation and approval of PCE and CE deliverables.

Table 1: PCE/CE Quality Management Roles and Responsibilities

Roles	PCE/ CE Quality Management Responsibilities
ODOT Region Environmental Coordinator (REC)	<ul style="list-style-type: none"> • Provides ODOT’s primary oversight over the NEPA process for PCEs and CEs, including the QC process and required documentation. • Performs QC review of PCE/CE documentation and record using the applicable QC documentation deliverable. • Verifies quality of draft PCE or CE documents prepared by local agencies and consultants. Signs PCE or CE documents prepared by local agencies and consultants. • Ensures all PCE or CE documents are accurate and complete and required QC documentation is complete prior to submitting to environmental manager, or qualified designee, for review and approval. • Verifies all supporting environmental discipline deliverables are complete and QC completed by the appropriate SME². • Participates in QA reviews of completed PCE/CE and supporting documents. • Files the final QC documents for PCE and CE projects on the current ODOT PCE/CE document storage system. • Maintains set of quality files in the ProjectWise “7_quality” folder.
ODOT Region Environmental Manager	<ul style="list-style-type: none"> • Ensures PCE and CE documents have received a documented QC review. • Provides ODOT NEPA Program with information for mid-year and annual PCE reports that outlines any inconsistencies or performance issues that have been noticed over the appropriate mid-year or annual reporting periods.

² All discipline deliverables prepared by ODOT staff, consultants, or local agencies in support of NEPA document follow statewide discipline-specific quality plans, procedures, and documentation requirements.

Roles	PCE/ CE Quality Management Responsibilities
ODOT NEPA Program staff	<ul style="list-style-type: none"> • Conducts regular quality assurance reviews of completed PCEs and CEs and provides a summary of PCE/CE QA Review findings and recommendations to regions (RECs and their managers) • Coordinates with regions to prepare and provide timely submittal of mid-year and annual reports to FHWA, including summary of QA review findings and recommendations provided to region and ODOT NEPA Program staff and managers, and implementation progress of any corrective actions, performance issues, and/or PCE program improvements. • Acts as liaison with regions and FHWA for answering questions, providing training/mentoring/assistance, etc. This does not eliminate the opportunity for regions to contact FHWA directly. • Provides timely responses to PCE and CE questions from regions, in coordination with FHWA as needed. • Assists with and provides PCE/CE training, mentoring, and guidance to RECs as needed. • Communicates any updates to the PCE program to RECs, their managers, and other region and/or NEPA Program staff as outlined in the <i>PCE Communication Plan</i> (Section 456 the NEPA Manual). • Assures ODOT PCE preparers and approvers meet qualification provisions as per the PCE Agreement.
FHWA (Oregon Division)	<ul style="list-style-type: none"> • Provides timely review of and response to ODOT mid-year and annual reporting. • As available, participates with ODOT in regular quality assurance reviews of completed PCEs and CEs prior to mid-year and annual reporting. • Provides timely responses to PCE questions from regions, in coordination with the ODOT NEPA Program. Collaborates and cooperates with ODOT NEPA Program and regions to resolve any issues, solve problems, and provide assistance. • Performs on-going monitoring of ODOT’s PCE/CE program. Monitoring includes “one or more program reviews” during the 5-year term of the PCE Agreement. • Provides FHWA QC review and approval of CEs.

3.2. EA/EIS Roles and Responsibilities

Table 2 lists the primary roles and responsibilities of ODOT and FHWA personnel involved quality management roles and responsibilities for EA/EIS documents. Outsourced (i.e., consultant) work products are discussed in [Section 3.4](#) below.

Table 2: EA/EIS Quality Roles and Responsibilities

Roles	EA/EIS Quality Management Responsibilities
<p>ODOT Environmental Project manager (EPM)</p>	<ul style="list-style-type: none"> • Provides ODOT’s primary oversight over implementation of the NEPA process for EA/EIS projects and preparation/distribution of quality EA/EIS documents. • When serving as project manager for outsourced work involving preparation of EA/EIS documents, verifies the quality of consultant work. • Works with consultants to integrate QC review tasks into the overall project schedule. • Performs QC review of each preliminary draft EA/EIS document and manages QC review from ODOT NEPA Program staff, ODOT SMEs, DOJ, cooperating and local agencies (as applicable), and FHWA. • Provides QC review of public involvement materials related to EA/EIS documents. • Determines EA/EIS document readiness for FHWA review and approval.
<p>ODOT NEPA Program staff</p>	<ul style="list-style-type: none"> • Maintains the ODOT NEPA Manual, which governs statewide ODOT NEPA processes and procedures, including Quality Management for EA/EIS documents. • Supports EPMs in the conduct of QC efforts for EA/EIS documents, including QC review of the preliminary and administrative drafts. • Acts as liaison with regions and FHWA for answering questions, providing training/mentoring/assistance, etc. This does not eliminate the opportunity for regions to contact FHWA directly
<p>ODOT Transportation Project Manager (TPM) Resident Engineer-Consultant Project Manager (RE-CP), or Project Leader (PL)</p>	<ul style="list-style-type: none"> • When serving as contract administrator for outsourced work involving preparation of EA/EIS documents, ensures that QC review is included in contract and performs QC review of preliminary draft. • Primary coordinator between the project and ODOT traffic, roadway, and bridge disciplines in association with design and analysis of EA/EIS project alternatives. Coordinates and confirms QC with these SMEs.
<p>ODOT Subject Matter Experts (SMEs)</p>	<ul style="list-style-type: none"> • Serve as part of EA/EIS interdisciplinary team responsible for QC review of technical discipline reports (including analysis methods) and individual resource sections of environmental documents.
<p>Oregon Department of Justice (DOJ)</p>	<ul style="list-style-type: none"> • Provides QC review of preliminary draft EA/EIS documents primarily to address legal sufficiency at the state level and specific to ODOT’s interests.
<p>ODOT Region or UMO Manager</p>	<ul style="list-style-type: none"> • As the ODOT decision-maker for EA/EIS projects and the ODOT signatory for EIS projects where ODOT is a co-lead agency with FHWA, may provide QC review of preliminary draft EAs or EISs.

Roles	EA/EIS Quality Management Responsibilities
Cooperating Agency	<ul style="list-style-type: none"> Provides input to EIS processes and serves as QC reviewer of preliminary draft EIS content concerning their expertise and jurisdictional authority, consistent with 40 CFR 1501.7(h), 40 CFR 1501.8, and 23 U.S.C. 139.
Local Agency	<ul style="list-style-type: none"> When serving as the project proponent/sponsor for EA or EIS projects or EA or EIS co-lead agency with FHWA, provides QC review of preliminary draft EA/EIS documents, as appropriate. When managing a consultant team to prepare preliminary draft EA/EIS documents, requires consultant team to provide QC review.
ODOT Communications	<ul style="list-style-type: none"> Provides QC review of public involvement materials related to EA/EIS documents. Provides QC review of public involvement content in preliminary draft EA/EIS documents, as appropriate.
FHWA Oregon Division	<ul style="list-style-type: none"> Serves as lead federal agency and NEPA decision-maker. Provides for FHWA QC review and approval of EA/EIS documents.
FHWA Legal Counsel	<ul style="list-style-type: none"> Provides QC review of administrative draft EAs and EISs primarily to address legal sufficiency at the federal level and specific to FHWA’s interests.

3.3. ODOT Work Products

See Section 4.2.

3.4. Outsourced Work Products

Table 3 lists the quality management responsibilities of a consultant involved in the preparation of NEPA documents and related deliverables. Consultant-prepared NEPA documentation must be developed to high quality standards prior to submittal of the deliverable to ODOT. The consultant contract must include tasks related to the consultant’s quality management of NEPA documents, including a QA/QC plan and documentation of the QC review of all NEPA deliverables in the contract. A primary intent of the consultant’s QA/QC plan is to ensure that all draft NEPA and supporting documents are reviewed by appropriate consultant subject-matter experts (SMEs) and a consultant technical editor prior to submittal to ODOT.

Consultant reviewers must be, at a minimum, equally as qualified as the consultant author/preparer. In addition to performing internal QC for accurate content and completeness, the consultant QC review must include a thorough technical edit (spelling and grammar) and a review for readability, format, consistency, and structure.

Consultants are required to provide ODOT with the QC documentation specified in **Table 4** of this quality plan to verify that a QC review has occurred.

Table 3: NEPA Quality Roles and Responsibilities for Consultants

Roles	Quality Management Responsibilities
Consultant	<ul style="list-style-type: none">• Utilizes a technical editor to ensure reader-friendliness, consistency of writing and data, grammatical correctness, cohesion, proper level of conciseness.• Prepares, maintains, and follows ODOT approved consultant quality plan.• Provides QC of NEPA deliverables, including any prepared by subconsultants; technical discipline reports.• Provides QC documentation as required by this quality plan (see Table 4) when submitting deliverables to ODOT.

4. Quality Control

4.1. Quality Control Milestones

[RESERVED]

4.2. Quality Control Reviews and Documentation

Quality for NEPA deliverables is demonstrated by following federal, state, and local regulations and the methods and procedures in the ODOT NEPA Manual. **Table 4** describes the quality control procedures that apply to all ODOT NEPA deliverables produced by consultants, local public agencies (LPAs), and ODOT staff. **Table 4** also indicates the required QC documentation that will provide reviewable evidence that quality work was done for NEPA deliverables. These quality records also provide the basis for quality reviews and/or audits.

The ODOT NEPA Program uses a risk-based approach to determine which deliverables require formal (i.e., formally documented) QC. If standard QC checklists, forms, or templates are not available for a particular deliverable, a quality control review is still required as described in manuals, guidance, or as considered necessary to meet industry standard of care.

Table 4: NEPA Deliverables Quality Control Procedures and Documentation

NEPA Deliverable	Deliverable Prepared by...	Applicable QC Procedures ³	Required QC Documentation
Environmental Prospectus	ODOT LPA Consultant	<ol style="list-style-type: none"> 1. ODOT REC or EPM reviews completed Environmental Prospectus (EP) to verify: <ul style="list-style-type: none"> • Consistency with the <i>Guidance for the ODOT Environmental Prospectus</i>; and • Content supports the preliminary NEPA class of action. 2. The REC provides comments and corrections as needed in the EP QC checklist comment log and returns EP QC checklist to the EP preparer. 3. The EP preparer makes necessary changes based on substantive comments received, contacting the REC reviewer for clarification as needed. 4. The REC signs EP QC checklist when all comments have been addressed. The final EP QC checklist should be included with the final EP deliverable. 5. REC fills in the fields on the EP row of the project's e-STR. 	<ul style="list-style-type: none"> • Statewide EP QC Peer Review Checklist and Comment Log (ODOT form 734-5259). • E-STR form 734-5227.

³ Electronic signature or initials will be considered a valid secure signature. The electronic signatures will include at least the name and date the document was signed.

NEPA Deliverable	Deliverable Prepared by...	Applicable QC Procedures ³	Required QC Documentation
<p>Only one of the following will apply to a project:</p> <ul style="list-style-type: none"> • CE Classification, Determination, and Approval for No Ground Disturbance (NGD) Projects (ODOT form 734-5149) <p>or</p> <ul style="list-style-type: none"> • FHWA and ODOT PCE Approval Document (ODOT form 734-5010A) <p>or</p> <ul style="list-style-type: none"> • FHWA and ODOT CE Closeout Document (ODOT form 734-5004) 	<p>ODOT LPA Consultant</p>	<ol style="list-style-type: none"> 1. A PCE-qualified peer reviewer reviews the appropriate NGD, PCE or CE files to verify compliance with Section 420 of ODOT NEPA Manual. 2. Peer reviewer completes the questions on the applicable QC checklist and provides comments and corrections as needed in the QC checklist comment log. The peer reviewer returns the completed QC checklist to the preparer. 3. The preparer makes necessary changes based on substantive comments received, contacting the peer reviewer for clarification as needed. 4. The peer reviewer signs the QC checklist when all comments have been addressed. 5. Final QC checklist should be included in the NGD, PCE, or CE submittal to ODOT NEPA Program, or FHWA, as applicable. 6. REC fills in the fields on the NGD, PCE, or CE row of the project’s e-STR, as applicable. 7. REC files documentation on the current ODOT PCE/CE document storage system (ProjectWise, iCERT, or other currently established system) for file retention and accessibility purposes (see Section 4.2.4). 	<ul style="list-style-type: none"> • Statewide PCE No Ground Disturbance (NGD) Quality Control Peer Review Checklist & Comment Log (ODOT form 734-5239). <p>or</p> <ul style="list-style-type: none"> • Statewide PCE Quality Control Peer Review Checklist & Comment Log (ODOT form 734-5237). <p>or</p> <ul style="list-style-type: none"> • Statewide CE Closeout Quality Control Peer Review Checklist & Comment Log (ODOT form 734-5247).

NEPA Deliverable	Deliverable Prepared by...	Applicable QC Procedures ³	Required QC Documentation
EA Revised EA/FONSI	ODOT LPA Consultant	See Section 4.2.1 . below for detailed QC procedures for EAs/EISs.	<ul style="list-style-type: none"> Quality Control Review and Certifications Form Draft Environmental Assessment (ODOT form 734-5325). Quality Control Review and Certifications Form Draft Revised Environmental Assessment (EA)/ Finding of No Significant Impact (FONSI) (ODOT form 734-5326).
Draft EIS Final EIS /ROD	ODOT LPA Consultant	See Section 4.2.1 . below for detailed QC procedures for EAs/EISs.	<p>Quality Control Review and Certifications Form Draft EIS (ODOT form 734-5323)</p> <p>Quality Control Review and Certifications Form Draft Final EIS / ROD (ODOT form 734-5324)</p>

4.3. EA and EIS Deliverables

The following procedures are applicable to ODOT's coordination and QC review of EA/EIS documents:

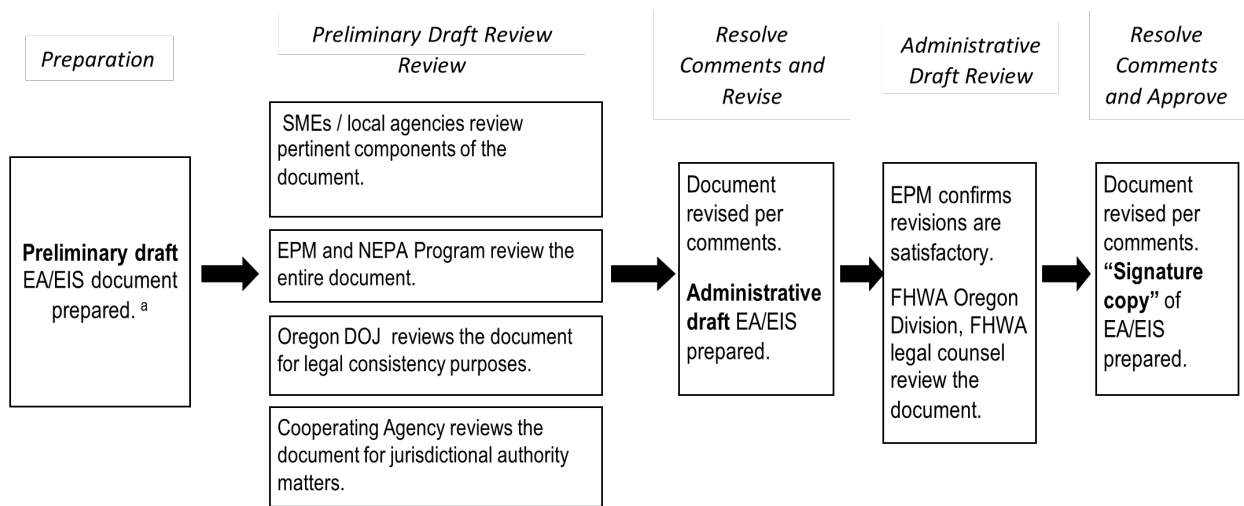
- Where ODOT acts as a joint lead agency for Federal-aid highway projects (FAHP) requiring an EA or EIS.
- Where a local agency is the primary sponsor for a FHWA-assisted transportation project requiring an EA or EIS.
- As governed by the FHWA-ODOT Oversight and Stewardship Agreement.

The procedures herein concern the QC review process for draft EA/EIS documents prior to publication and release to the public. Consultants, ODOT EA/EIS project teams, including ODOT, sponsoring agencies, and consultants, and local agencies (as applicable) shall implement these procedures during the preparation and review of EA/EIS documents.

The following procedures apply to documenting QC review for any EA/EIS document, including an EA, draft EIS, revised EA/FONSI, and final EIS/ROD. While the QC review *procedures* are the same, the QC *documentation* used to record and document QC review are unique and specific to each NEPA document (e.g. the EA Quality Control Review and Certifications Form would be used for an EA, while the Draft EIS Quality Control Review and Certifications Form would be used for a Draft EIS).

An overview of ODOT's QC review process for EAs and EISs is illustrated in the below process flow diagram (**Figure 1**) and described in the following subsections.

Figure 1: ODOT EA/EIS Document QC Review Process



^a ODOT EPM should be involved with preparation and pre-review of preliminary draft documents.

Preliminary Draft QC Review Procedures

Preparation of the Preliminary Draft

- 1) The **consultant**⁴ prepares the preliminary draft NEPA document in accordance with ODOT and FHWA guidance; the tasks, deliverables and schedule described in the consultant contract; and the consultant’s internal QC review plan.
- 2) The **ODOT EPM** provides oversight and direction during preparation of the preliminary draft NEPA document. The EPM regularly pre-reviews the preliminary draft NEPA document while it is in progress and in conjunction with the consultant’s internal QC review⁵. The ODOT EPM provides the consultant with the appropriate **quality control review and certifications form (see Table 4)**.
 - a. ODOT EPM completes the project name and other project information fields (e.g. ODOT key number, NEPA start date) and the “Contact Information” section prior to providing form to consultant.

⁴ Most EA/EIS documents will be prepared by a consultant. When EA/EIS documentation is prepared by ODOT staff, the procedures apply to ODOT authors and internal reviewers.

⁵ The ODOT EPM should coordinate with the consultant to review the preliminary draft NEPA document while it is in progress to address issues and concerns early and to streamline review of the consultant’s final draft once it is submitted to ODOT.

- 3) The **ODOT EPM** or **consultant** notifies those with a QC role of the expected QC review period for the preliminary draft NEPA document and requests that the QC reviewers schedule adequate calendar time for QC review. Standard review timeframes are specified in **Tables 5 and 6**.
- 4) When the preliminary draft NEPA document is ready for delivery to ODOT, **consultant** records and certifies completion of internal consultant QC review on the **Quality Control Review and Certifications Form** and submits the form, preliminary draft NEPA document, and any other relevant material to the ODOT EPM.
 - a. In the first column of the QC Review and Certifications Form under “Consultant QC Review,” the consultant records the name (first initial and last name) of the QC reviewer and the date the review was completed for each section and/or sub-section of the preliminary draft NEPA document.
 - b. If a section and/or sub-section is not included or required for the document, the consultant checks the box in the first column labeled “N/A.”
 - c. The QC Review and Certifications Form for REA/FONSI and FEIS/RODs include an additional set of columns on the left, indicating revisions made to the EA or DEIS. For QC review of REA/FONSI and FEIS/RODs, consultant checks one of the “Revisions to DEIS” columns on the left indicating if the content was revised or not revised based on comments received on the DEIS. If the content was not included in the DEIS, consultant checks N/A.
 - d. The consultant completes and signs the “Preliminary Draft Certifications” at the bottom of the QC Review and Certifications Form. The consultant should complete both the “Environmental Consultant Project Manager” and the “Consultant Technical Editor” certifications.
- 5) The **ODOT EPM** reviews the preliminary draft and, using the **QC Review and Certifications Form**, certifies that the preliminary draft DEIS is ready to be distributed for QC review and comment to the appropriate reviewers.
 - a. Having pre-reviewed the preliminary draft (see Step 2 above), the EPM should provide a streamlined review.
 - b. The EPM completes and signs the first of the EPM “Preliminary Draft Certifications” at the bottom of the Quality Control Review and Certifications Form.
- 6) The preliminary draft DEIS is now ready to be distributed for QC review and comment to the appropriate reviewers.

QC Review of the Preliminary Draft

- 1) The **ODOT EPM** or **consultant** distributes the preliminary draft NEPA document to those with a QC role.
 - a. The distribution email will include a due date for reviewers to complete review and submit comments. Standard review timeframes are specified in Tables 5 and 6, and should have been previously communicated to reviewers in Step 3 above.
 - b. The distribution email will inform reviewers of the appropriate format for comments. Appropriate formats could include tracked changes and comments in MS Word, the ODOT QC comment log, or an alternate method approved by the ODOT EPM. ODOT reviewers will be asked to consolidate their comments to the degree possible and practicable.
- 2) The **ODOT NEPA Program reviewer** supports the ODOT EPM by conducting a QC review of the complete preliminary draft NEPA document and recording their QC review on the **Quality Control Review and Certifications Form**.
 - a. The ODOT NEPA Program reviewer completes and signs the NEPA Program reviewer “Preliminary Draft Certifications” at the bottom of the quality control review and certifications form.

Comment Resolution and Revisions to Preliminary Draft

- 1) The **consultant** will revise the preliminary draft NEPA document in response to the submitted comments as appropriate, addressing each reviewer’s comments and sending document revisions with clear indication of how the revisions respond to comments received.
 - a. Consultant will copy the ODOT EPM on such communications.
 - b. Where there are no major issues needing discussion, comment resolution can be completed via email.
 - c. There is only one iteration of review and comment for reviewers.
 - d. Complex projects or poor quality preliminary drafts may require further QC actions to address unresolved concerns. If comments are not resolved after one review, consultant and ODOT EPM may need to hold a comment resolution meeting with the reviewer(s) to ensure critical comments in need of formal discussion are adequately addressed and resolved.
 - e. Revisions to the preliminary draft document may need a follow-up review by the ODOT SMEs, EPM, NEPA Program reviewer, or others if the comments were highly technical within the specific discipline, difficult in nature, or if requested by the reviewer.

- 2) The **ODOT EPM** will confirm comment resolution completion for the preliminary draft NEPA document and record and certify ODOT's preliminary draft QC review completion on the **Quality Control Review and Certifications Form**.
 - a. In the middle columns of the Quality Control Review and Certifications Form under "ODOT QC Review," the ODOT EPM records their name (or the name of QC reviewer if review was completed by someone other than EPM) and the date the review was completed for each section and/or sub-section of the preliminary draft NEPA document.
 - b. The ODOT EPM completes and signs the second of the "ODOT EPM" certifications under "Preliminary Draft Certifications" at the bottom of the quality control review and certifications form.
- 3) The document is now considered an administrative draft ready for FHWA review.

Administrative Draft QC Review Procedures

FHWA QC Review of the Administrative Draft

- 1) The **ODOT EPM** oversees transmittal of the administrative draft NEPA document to FHWA for review.
 - a. The distribution email will include a transmittal letter and a due date for FHWA reviewers to complete the review and submit comments. Standard review timeframes are specified in **Tables 5 and 6**.
 - b. The distribution email will ask FHWA reviewers to provide comments in an appropriate format, as agreed to by ODOT and FHWA. Appropriate formats could include track changes and comments in MS Word, the ODOT QC Comment Log, or an agreeable alternate method. FHWA reviewers will be asked to consolidate their comments to the degree possible and practicable.
- 2) FHWA comments on the administrative draft will be provided to the ODOT EPM to be transmitted to the consultant⁶.

Comment Resolution and Approval of the Administrative Draft

- 1) The **consultant** will revise the administrative draft document as appropriate in response to the submitted FHWA comments, address each reviewer's comments, and send document revisions and/or comment responses to each reviewer. The consultant will

⁶ Depending on the project and with prior agreement between ODOT and FHWA, FHWA may provide comments on the administrative draft to ODOT and the consultant concurrently.

record a response to each comment and provide explanation for and notation of any changes to the document during comment resolution.

- a. Consultant will copy the ODOT EPM on such communications.
 - b. Where there are no major issues needing discussion, comment resolution can be completed via email.
 - c. Normally, there is only one iteration of review and comment for FHWA reviewers of the administrative draft NEPA document. For some complex projects and where comments are particularly difficult to resolve, a second review may be warranted.
 - d. If comments are not resolved after one review, consultant and ODOT EPM may need to hold a comment resolution meeting with the FHWA reviewer(s) to ensure critical comments in need of formal discussion are adequately addressed and expeditiously resolved.
 - e. Revisions to the administrative draft NEPA document may need a follow-up review by FHWA reviewers if the comments were highly technical within a specific discipline, difficult in nature, or if requested by the reviewer. The need for such a follow-up review will be determined by FHWA Oregon Division staff.
- 2) The **ODOT EPM** will confirm the completion of comment resolution for the administrative draft NEPA document and record and certify completion of ODOT's administrative draft QC review on the **Quality Control Review and Certifications Form**.
- a. In the third column of the Quality Control Review and Certifications Form under "Admin Draft ODOT QC Reviewer," the QC reviewer (usually the ODOT EPM) records their name and the date the review was completed for each section and/or sub-section of the administrative draft NEPA document.
 - b. The ODOT EPM completes and signs the "ODOT EPM" certifications under "Administrative Draft Certifications" at the bottom of the Quality Control Review and Certifications Form.
- 3) **FHWA Oregon Division** approves the administrative draft NEPA document for release and public review.
- 4) The **consultant** finalizes an approval/signature-ready copy of the NEPA document and submits the form, signature-ready document, and any other relevant material to the ODOT EPM.
- 5) The NEPA document is ready for final signatures and public release.
- a. For a Draft EIS, FHWA Oregon Division submits EIS Notice of Availability (NOA) for publication in *Federal Register*.

- b. Approval signatures are provided by lead agency officials.⁷
- c. An EA or Draft EIS is released for public and agency review and comment. A revised EA/FONSI or FEIS/ROD is released for public and agency review. (Public and agency comments are not solicited regarding the revised EA/FONSI or FEIS/ROD.)

EA and EIS QC Timelines

The QC review process for EA/EIS documents must be conducted efficiently and in a timely manner. The QC reviews of a preliminary and an administrative draft EA or EIS are critical milestones.

Tables 5 and 6 list standard QC review timelines, which reflect a balance between the integrity of EA/EIS document quality control and a recognition of differing scopes of review per QC reviewer. Extension or reduction of QC review timelines may be permitted, if ODOT and FHWA provide written consent. Overall timelines to complete EAs and EISs are set by CEQ regulations and may not be negotiated.

These timelines assume adequate and comprehensive early coordination with internal and external stakeholders and partner agencies has occurred and was well organized at the beginning of the NEPA process. The QC review process, including early coordination and review timelines, should be incorporated into the overall project schedule and shared with QC reviewers as far in advance as possible. The schedule should be reviewed and updated regularly to allow for advance notice of changes to deliverables and/or review dates.

Table 5: QC Review Times for Preliminary Draft NEPA Documents

QC Reviewer	EA	REA/FONSI	DEIS	FEIS/ROD
Cooperating Agency	10 working days	5 working days	15 working days	10 working days
ODOT Project Team	10 working days	5 working days	15 working days	10 working days
Local Agency Sponsor	10 working days	5 working days	15 working days	10 working days
ODOT SMEs ⁸	10 working days	5 working days	15 working days	10 working days

⁷ For FHWA Oregon Division, the signatory will typically be the division administrator. For ODOT, the signatory will typically be the applicable region manager or Urban Mobility Office manager.

⁸ If an ODOT SME requests an additional review period to verify revisions to technical reports based on QC review comments, the SME may complete this second “verification” review concurrently with FHWA review. However, this should occur primarily for complex projects or poor quality preliminary drafts and should not be considered routine practice.

QC Reviewer	EA	REA/FONSI	DEIS	FEIS/ROD
ODOT EPM	12 working days	12 working days	20 working days	20 working days
ODOT NEPA Program	12 working days	12 working days	20 working days	20 working days
Oregon DOJ	10 working days	10 working days	15 working days	15 working days

Table 6: QC Review Times for Administrative Draft NEPA Documents

QC Reviewer	EA	REA/FONSI	DEIS	FEIS/ROD
FHWA Oregon	12 working days	12 working days	20 working days	20 working days
FHWA Legal ⁹	30 working days	30 working days	30 working days	30 working days

4.4. Technical Competency

PCE and CE Technical Competency

ODOT’s Programmatic Categorical Exclusion Agreement (PCE Agreement) with FHWA sets forth the minimum training, knowledge, and experience (i.e., professional qualification requirements) for ODOT staff who prepare¹⁰ and review PCE and CE documents and approve PCE documents.

The ODOT NEPA Program ensures that PCE and CE document preparers, reviewers, and approvers meet professional qualification provisions as per the PCE Agreement (i.e., knowledge, education, and training) by maintaining a database of the professional credentials of all ODOT staff and managers who meet the PCE professional qualification requirements. The professional credentials database is updated annually and any time there is a change in personnel (e.g., new hires) who will prepare and/or approve any PCE or PCE supporting document. A summary of qualified ODOT staff changes within any year as well as a link to the database information (i.e., ODOT staff professional qualifications) are provided to FHWA as part of the annual report for the PCE Agreement.

⁹ FHWA legal sufficiency review is required on all EISs and final Section 4(f) evaluations; legal sufficiency review of EAs is optional and conducted on a case-by-case basis as determined by FHWA OR Division and headquarters staff, as appropriate.

¹⁰ Consultants hired by ODOT or an LPA who prepare PCE/CE documents may only provide a draft of those documents to ODOT for review and approval by the REC or EPM assigned to that ODOT or LPA project as per the ODOT-FHWA PCE Agreement.

The ODOT NEPA Program also works with FHWA OR Division to provide training, as needed and/or as recommended through QA reviews and/or to meet identified PCE/CE process improvements as appropriate, to help ensure region and/or NEPA Program staff and managers maintain core technical competencies.

EA and EIS Technical Competency

[RESERVED]

4.5. Interdisciplinary QC Review

NEPA analysis requires an interdisciplinary approach. Multiple environmental discipline deliverables (e.g., resource findings, clearances, technical reports, etc.) are prepared in support of NEPA documents. All discipline deliverables prepared by ODOT staff, consultants, or local agencies in support of NEPA documents, as well as the analysis methods used in these documents, are reviewed by the assigned ODOT SMEs and follow statewide discipline-specific quality plans, procedures, and documentation requirements.

During a NEPA QC review, the ODOT REC or EPM is not responsible for QC review of the supporting discipline deliverable itself, but rather verifies that the discipline deliverable is complete and QC was completed by the appropriate discipline SME. For EAs and EISs, the EPM verifies that the information and analysis contained in the EA/EIS document is accurate, consistent with, and properly summarizes the findings from the supporting discipline deliverable(s).

4.6. Software, Tool, and Data Validation

[RESERVED]

4.7. Quality Control Document Storage

All quality records in ProjectWise are stored in their regular discipline or milestone directory, with either “QC,” “QA” or “QV” in the document title or description, to facilitate searches for quality documentation. Quality files from each discipline or milestone folder in ProjectWise will be added to a set created in the “7_Quality” folder for Environmental: E_K#####_##.

See [ProjectWise 7_Quality folder FAQs](#) and guidance on [How to Create Document Sets_QG.pdf](#).

RECs will file the final QC documents for NGD, PCE, and CE projects in the current ODOT PCE/CE document storage system (ProjectWise, iCERT, or other currently established system) for file retention and accessibility purposes. Documents should be uploaded to the system as they are completed and all QC documents should be located with the final/approved PCE/CE discipline deliverables.

4.8. Quality Control Communications

The process described by Section 4.2 defines the minimum level of communication and collaboration necessary to meet the requirements of the NEPA Deliverables Quality Plan. The ODOT REC or EPM is responsible to coordinate communication regarding the NEPA process and deliverables, including the QC process and required documentation. Members of the project team internally and externally are encouraged to freely communicate with ODOT REC or EPM by email or phone throughout the life of the project to assure a high level of service and quality and reduce significant amounts of rework, errors, or omissions. At any step in the QC review process, reviewers may provide constructive comments to the document preparers and request or suggest document revisions if necessary for completeness, clarity, and accurateness.

5. Quality Assurance

QA is a system used to maximize the effectiveness of the quality program. The QA process assists in measuring the effectiveness of quality efforts to provide continuous improvements and identify technical development needs. The NEPA Program also uses QA to determine any warranted updates or revisions to the standard operating procedures for NEPA documentation.

5.1. Quality Assurance Review Process

5.1.1 PCE and CE Deliverables

ODOT uses QA to ensure PCE decisions made by region and the ODOT NEPA Program staff and managers who prepare and approve PCE and supporting documents are consistent with the PCE Agreement. ODOT also uses the same QA procedures for projects covered by FHWA-approved CEs.

In general, the goal of QA is correction. QA measures promote consistency and compliance documentation with the PCE Agreement, PCE/CE procedures (Section 420 of the ODOT NEPA Manual), and these QA/QC procedures to assure accuracy and consistency, and prevent redundancies and gaps.

QA measures include:

- Keeping Section 420 and all subsections of the ODOT NEPA Manual related to PCE procedures up-to-date and readily accessible.
- Ensuring ODOT forms, templates, and other process tools that are created and/or revised for use in preparing PCE/CE and supporting documents are reviewed and approved by FHWA and are up to date.
- Ensuring recommendations and corrective actions identified from QA reviews of completed PCEs/CEs and FHWA PCE program reviews are incorporated into statewide ODOT trainings, REC team meeting discussions, Section 420 of the ODOT NEPA Manual, or other processes as appropriate, following the PCE/CE Communication Plan (Section 456 of the ODOT NEPA Manual).
- Ensuring professional qualification requirements, per the PCE Agreement (Section IV.A.8-9), are achieved and maintained by all ODOT staff and managers who prepare and approve PCEs and supporting documents.
- Ensuring consistent PCE document record keeping.

ODOT NEPA Program staff, in coordination with region and FHWA staff conduct regular QA reviews on completed PCE/CE and supporting documents. Standard questions developed by the ODOT NEPA Program and FHWA staff are used to assess the accuracy and consistency of PCE/CE documents and processes using the CE/PCE procedures in Section 420 of the ODOT

NEPA Manual. ODOT NEPA Program staff produce written summaries using a standard format to provide QA review findings and recommendations. This information is shared with RECs and their managers via email and discussed at REC and environmental manager meetings. The ODOT NEPA Program staff follow up with any needed actions or process improvements including, but not limited to, training, mentoring, guidance, and policy.

The QA reviews of completed PCEs, in coordination with regions and FHWA, examine the following:

- Appropriateness of PCE Determination.
- Appropriate application of 23 CFR 771.117.
- Completeness of PCE documentation.
- Accuracy of information documented in PCE and supporting documents.
- Appropriateness of region QC peer review and approval signatories for PCE Approval Documents as per the applicable PCE, CE, or NGD *Statewide Quality Control Peer Review Checklist & Comment Log* and associated procedures.
- Appropriateness of the potential need for re-evaluations.

FHWA will conduct one or more program reviews as part of its oversight activities during the term of the PCE Agreement. As per the PCE Agreement (Section VII.C., page 7), FHWA program monitoring will include technical competency consideration, ODOT organizational capacity, and ODOT's performance of its PCE processing functions. Performance considerations include, without limitation:

- Quality and consistency of ODOT's PCE approvals.
- Project environmental documentation.
- CE submissions to FHWA for approval.
- Adequacy and capability of ODOT staff and consultants.
- Effectiveness, quality, and consistency of ODOT's administration of its PCE approvals.

ODOT NEPA Program staff will prepare and implement any needed corrective action plan to address findings or observations identified in FHWA program reviews. ODOT NEPA Program staff will draft the corrective action plan within 45 calendar days of FHWA finalizing its review. The results of that review and ODOT's corrective actions will be addressed at the time the PCE Agreement is considered for renewal.

5.1.2 EA/EIS Deliverables

[RESERVED]

5.2. Quality Assurance Document Storage

Project quality records in ProjectWise are stored in their regular discipline or milestone directory, with either “QC,” “QA,” or “QV” in the document title or description, to facilitate searches for quality documentation. Create a set of quality files from each discipline or milestone folder in ProjectWise in the ProjectWise “7_quality” folder, E_K#####_##.

5.3. Quality Assurance Communications

The process described by Section 5.1 defines the minimum level of communication and collaboration necessary to meet the requirements of the NEPA Deliverables Quality Plan.

The ODOT NEPA Program is responsible to coordinate communication regarding the results of NEPA QA reviews to ODOT RECs and EPMS in annual meetings and trainings to assure a high level of service and quality in NEPA deliverables.

Appendix A – Glossary

Table A-1 lists acronyms and **Table A-2** lists definitions for terms found in this quality plan. Additional discipline-specific acronyms and definitions can be found in the ODOT NEPA Manual.

Table A-1: Glossary of Acronyms

Acronyms	Explanation
CE	Categorical Exclusion
CEQ	[Federal] Council on Environmental Quality
DEIS	Draft EIS
DOJ	Department of Justice
EPM	Environmental project manager
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP	Environmental Prospectus
FEIS	Final Environmental Impact Statement
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
NEPA	National Environmental Policy Act
NGD	No Ground Disturbance
NOA	Notice of Availability
PCE	Programmatic Categorical Exclusion
PL	Project leader
REA	Revised Environmental Assessment
REC	Region environmental coordinator
RE-CP	Resident engineer-consultant project manager
ROD	Record of Decision
SME	Subject matter expert
TPM	Transportation project manager
UMO	Urban Mobility Office

Table A-2: Glossary of Terms

Term	Explanation
DAP	Design acceptance package; statewide phase gate project delivery milestone.
PS&E	Plans, specifications and estimates; statewide phase gate project delivery milestone.
Quality control (QC)	Focused on the product fulfilling quality requirements as it is developed.
Quality assurance (QA)	Focused on the process and assurances that quality requirements are being fulfilled. <ul style="list-style-type: none">• Verifying that QC was done following the quality processes.• Reviews of QC and QA processes, supporting continuous improvement.• Project and program level QA reviews.
Quality Management	Policies, processes, activities, and responsibilities that ensure the overall quality of tasks and deliverables in project delivery. Quality management is implemented by means such as quality planning, quality control, quality assurance, and continuous improvement within the system.
Quality Verification (QV)	Review process to ensure technical sufficiency of all deliverables, verify performance of all quality tasks, and to document the completion of those tasks.
POR	Professional of record
Technical sufficiency	Reviewing a deliverable for technical sufficiency means technical review, checking that the deliverable is in compliance with all applicable laws, rules, regulations, technical standards, guidance, policies and procedures, suitable for the milestone. An initial check of key elements can be used to decide whether additional review is warranted.



ODOT provides a safe and reliable multimodal transportation system that connects people and helps Oregon's communities and economy thrive.

www.oregon.gov/ODOT

