

# NEPA Documentation Quality Assurance/Quality Control Manual

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NEBRASKA

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DEPARTMENT OF TRANSPORTATION



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## Acronyms and Terms

Acronym or Term	Definition
CE	Categorical Exclusion. CE means a category of actions which do not individually or cumulatively have a significant effect on the human environment (40 CFR 1508.4). A Level 1 CE refers to a subcategory of CE as defined within the Programmatic Categorical Exclusion Agreement between NDOT and FHWA (2015). There are also Level 2 and Level 3 CE actions defined in the agreement. The CE levels correspond with project scope, degree of impact and level of review and approval responsibilities.
CFR	Code of Federal Regulations
Consultant QA/QC Certification Statement	The consultant is required to submit a QA/QC Certification Statement with each NEPA document they prepare and submit to NDOT. The certification attests to the quality and accuracy of the document and confirms that the consultant completed their QA/QC review of the document prior to submittal to NDOT.
Document	Refers to the physical document that is going through the QC process. This will be one of the NEPA documentation types or supporting documentation.
Document Author	Refers to the primary author of a document whether developed internally at NDOT, or externally by a consultant.
EA	Environmental Assessment. An EA is a concise public document that provides sufficient evidence and analysis to determine whether to prepare an EIS or FONSI.
EDU	Environmental Documents Unit
EIS	Environmental Impact Statement. An EIS means a detailed written statement as required by the National Environmental Policy Act (40 CFR 1508.11).
Embedded Staff	External environmental consultant staff contracted by NDOT to serve as a member of NDOT staff.
Environmental Project Manager	NDOT staff assigned with responsibilities to manage NEPA documentation through completion and assist in the resolution of issues. Environmental Project Managers may approve Level 1 and 2 Categorical Exclusions.
Environmental Supporting Documentation	May include technical reports, memoranda, and correspondence.
ESM	Environmental Section Manager
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
Full Document Review	Detailed review of entire document for content; consistency between document sections and chapters; accuracy; grammar; completeness; and compliance with applicable laws, regulations, and guidelines. This includes review of table of contents, tables, figures, cross-references, appendices, etc.

Acronym or Term	Definition
NDOT	Nebraska Department of Transportation
NEPA	National Environmental Policy Act
NEPA Document	Refers to Categorical Exclusion (CE); Environmental Assessment (EA) and Finding of No Significant Impact (FONSI); Draft, Final and Supplemental Environmental Impact Statements (DEIS, FEIS, Supplemental DEIS, Supplemental FEIS) and Record of Decision (ROD)
NEPA Documentation	Includes NEPA documents, as well as any documentation developed in support of the NEPA document, such as technical memoranda, reports, surveys, and correspondence.
NEPA Documentation QC Review Form	Also referred to as " <i>QC Review Form</i> " in this manual, this is NDOT's form that accompanies the QC Review Copy of a document through NDOT's QC review process. When the QC review process is completed and the form is fully signed, it is saved for future QA audit purposes.
NEPA Specialist	NDOT environmental staff specializing in NEPA compliance.
PQS	Professionally Qualified Staff. NDOT environmental staff specializing in certain resources (e.g., historic, biological, civil rights).
PS&E	Plans, Specifications, and Estimates
QA	Quality Assurance
QC	Quality Control
QC Comment/Response Matrix	The Nebraska Department of Transportation's QC Comment/Response Matrix used to record QC comments on a document and how comments are addressed/resolved.
QC Review Copy	The version of document(s) currently undergoing QC review.
QC Review Form	Shortened term used for NDOT's NEPA Documentation QC Review Form.
QC Reviewer	A qualified individual who provides an independent review of NEPA documentation and/or supporting environmental documents.
Reevaluation	Reevaluations of NEPA documents are necessary at certain key points in the overall process to establish whether or not the NEPA, determination or final project decision remains valid for the subsequent federal action.
RFQ	Request for Qualifications
ROD	Record of Decision
S&O	Stewardship and Oversight
Second Review	A higher-level review conducted after full document review or targeted technical reviews have been completed, or a second review to ensure that previous comments or requested changes have been made in the document.

Acronym or Term	Definition
Supplemental EIS	Supplemental Environmental Impact Statement
Targeted Technical Review	A detailed review of document content specific to a QC Reviewer’s technical expertise (e.g., biological resources, civil rights) to ensure quality of content, accuracy, compliance with laws and regulations, etc. Often this involves review of not only NEPA document section(s) but also associated technical reports, technical memoranda, or other related information prepared for a specific resource or topic.
Unit/Division Staff	NDOT staff from Units or Divisions outside the Environmental Section (e.g., roadway design, bridge, and construction).
USC	United States Code

# Chapter 1 NDOT's Quality Assurance/Quality Control (QA/QC) Policy

## 1.1 Introduction

The Nebraska Department of Transportation (NDOT) is dedicated to delivering a safe and efficient transportation system, and is committed to making sound decisions that balance the transportation needs of a proposed project with its environmental impacts. NDOT complies with the National Environmental Policy Act (NEPA) and other federal environmental requirements for its projects that use federal funding or require a federal permit or approval. NDOT incorporates Quality Assurance (QA) and Quality Control (QC) within its NEPA documentation review processes to comply with NEPA and other applicable laws and regulations, as well as to ensure that NEPA documentation is clear, accurate, and complete.

## 1.2 Applicability of this Manual

The purpose of this manual is to provide guidance and tools for NDOT staff to incorporate QA and QC throughout the NEPA documentation and decision making process. The manual is intended to provide a functional, flexible, and easily understood set of guidelines to maintain and ensure quality in the preparation of NEPA documentation, including Categorical Exclusions (CE); Environmental Assessments (EA); Findings of No Significant Impact (FONSI); draft, final, and supplemental Environmental Impact Statements (EIS); Records of Decision (ROD); and Re-evaluations; as well as supporting documentation, such as technical reports, memoranda, or correspondence.

NEPA documentation is a key instrument in communicating with members of the public, stakeholders, government agencies, and non-governmental organizations. NEPA documentation must be based on accurate technical information and environmental analyses, must be well-written for the general public, and must provide full and accurate disclosure of the merits and impacts of NDOT projects. This manual outlines the general expectations of the QC review process to meet NDOT's commitment to quality documentation, for both internal (NDOT-prepared) and external (consultant or local public agency-prepared) NEPA documentation.

**Quality Control** is a process used to verify and maintain the accuracy and quality of technical analyses and documentation through appropriate review and checking against established standards. The quality control process is employed at the production and administrative levels. **QC identifies and corrects problems** in order to produce the desired quality of products and services.

**Quality Assurance** is a system for ensuring a desired level of quality control in the development, production, or delivery of products and services. **A QA system is used at the management level to ensure that appropriate QC procedures and tools have been established and are being routinely employed**, that these procedures are constantly reviewed and improved, and that the desired levels of quality products and services are being provided.

The following sections of this manual outline the QC review process to be followed by NDOT staff in the preparation, review, and distribution of NEPA documents, and the QA process to be followed by NDOT staff to ensure the QC review process is being properly conducted. The processes outlined herein shall be followed for all NDOT projects whether they are processed pre- or post-assignment under 23 United States Code (USC) 326 (Categorical Exclusion Assignment) or 23 USC 327 (NEPA Assignment).

## 1.3 Who Conducts QC Reviews of NEPA Documentation?

The following staff can conduct QC reviews of NEPA documentation whether prepared internally by NDOT authors or externally prepared by consultants:

- **NEPA Specialist.** NEPA Specialists performing QC reviews must be full-time, qualified staff. Qualification requirements can be found in Section 1.3.1. State employee staff can perform QC reviews, but not on their own project's documents.
- **Professionally Qualified Staff (PQS).** PQS may review portions of a document in areas of their responsibility or expertise (e.g., historic, biological, civil rights); however, a review of the complete document, including supporting documentation, must be completed by a NEPA Specialist after PQS have completed their review.
- **Unit and Division Staff.** NDOT staff from Units or Divisions outside the Environmental Section may perform QC reviews specific to their related discipline and expertise (e.g., roadway design, bridge, and construction); however, a review of the complete document, including supporting documentation, must be completed by a NEPA Specialist after Unit and Division Staff have completed their review.
- **Environmental Project Manager.** Environmental Project Managers within the Environmental Section may conduct a Second Review on CE Level 2 and Re-evaluations associated with CE Level 2, including supporting documentation (Second Review is defined in Section 2.1).
- **Environmental Documents Unit (EDU) Manager or Environmental Section Manager (ESM).** The EDU or ESM must conduct a Second Review on CE Level 3, EA/FONSI, EIS/ROD, and Re-evaluations associated with these documentation levels, including supporting documentation. The EDU Manager and ESM are also responsible for ensuring that QA/QC procedures are being followed program-wide.

### 1.3.1 NDOT Staff Qualifications to Perform QC Reviews of NEPA Documentation

NDOT environmental staff performing document reviews must be knowledgeable of current environmental laws and executive orders in addition to NDOT and FHWA environmental regulations, policies and procedures. They should have successfully completed the following instructor-led training course prior to performing QA/QC reviews of NEPA documentation, or equivalent transportation focused virtual training such as the interactive multi-day training workshops provided by other vendors (e.g. Shipley Group):

- National Highway Institute Course #142005 - *NEPA and the Transportation Decision Making Process*

NDOT QC reviewers should also have six months of NEPA experience specific to the Nebraska federal-aid transportation program. The EDU Manager will determine if an individual has sufficient NEPA experience to perform QC reviews. NDOT PQS and staff from other Units or Divisions are not required to meet the above training or experience qualifications as long as their comments are related to their technical specialty areas (e.g., historic, biological, engineering, and civil rights) or disciplines outside of environmental resources (e.g., roadway design, bridge, and construction).

### 1.3.2 NDOT's Policy Regarding Consultant QA/QC Procedures

Consultant-provided NEPA documentation is a contract deliverable and, therefore, proper QC techniques must be practiced by consulting firms in order to minimize rework, minimize project

schedule impacts, and minimize change orders. The consulting firm's ability to deliver well-prepared documentation will be monitored through NDOT's Quality Assurance process (described in Chapter 3) and used by NDOT in ranking Requests for Qualifications (RFQs) in the future, for both on-call contracts and individual projects. For information on NDOT's procurement procedures, see the NDOT Procurement Manual (<http://dot.nebraska.gov/media/6094/ndor-consultant-procurement-manual.pdf>).

NDOT requires consultants to develop and implement their own QA/QC Management Plan for all NEPA documentation prior to submittal to NDOT. The consultant shall have their QA/QC Management Plan on file with NDOT prior to document submittal. This can be done on two different levels:

- For On-Call contracts, the consultant prepares a single overarching QA/QC Management Plan that applies to all task orders under that On-Call contract. The QA/QC Management Plan for On-Call contracts may be reviewed and approved by many NDOT staff, depending on the full scope of the contract (e.g., the contract may include design, survey, and right-of-way disciplines in addition to environmental). The EDU Manager, ESM, or EPM should review the plan to ensure it meets the needs of the department in terms of environmental review.
- For separate projects delivered outside the On-Calls (e.g., EAs awarded through RFQs), the consultant prepares a project-specific QA/QC Management Plan, to be submitted to the NEPA Specialist, along with the detailed project schedule, after the project is contracted. The NEPA Specialist, coordinating with either an EPM, the EDU Manager, or ESM as necessary, will determine whether the project specific QA/QC Management Plan is adequate for the project. The complexity of the plan should be commensurate with the scope and complexity of the project.

NDOT requires consultants to complete an internal QC review of all prepared documents prior to submittal to NDOT in order to:

- Ensure that the document is complete and complies with all state and federal regulations;
- Verify and maintain the accuracy and quality of technical analyses;
- Ensure that the document is well-written for the general public's consumption; and
- Provide full and accurate disclosure of the merits and impacts of the project.

The consultant performing the QC review shall not be the same person that is preparing the environmental document, but rather an independent and qualified reviewer. The consultant QC reviewer will prepare and sign a QC Certification Statement (see Appendix A for an example) that attests to the accuracy and completeness of each NEPA document submitted for NDOT review. The certification should also include name(s) of the specific individual(s) who reviewed the document and must accompany the formal submittal of draft or final documents to NDOT. The purpose of this statement is to assure NDOT that the document has been reviewed by a qualified reviewer for the items listed above prior to submittal to NDOT. This statement is a requirement on all NEPA submittals unless otherwise stated in the contract.

The consultant is expected to perform the following QC-related tasks when submitting NEPA documentation for NDOT review:

- Submit all documents in electronic format.
- Include line numbering for draft EAs and EISs. Line numbering should not be provided in the final versions of these documents.

- Provide a completed QC Comment/Response Matrix (see Appendix D) or other approved review method with each document submittal that is responding to FHWA or NDOT review comments.
- For EAs and EISs, provide any changes made in response to FHWA or NDOT comments in “track change” mode or other approved review method to allow for easy identification of changes made. Note: The Smartform tool for CEs is automatically updated and unable to track changes.

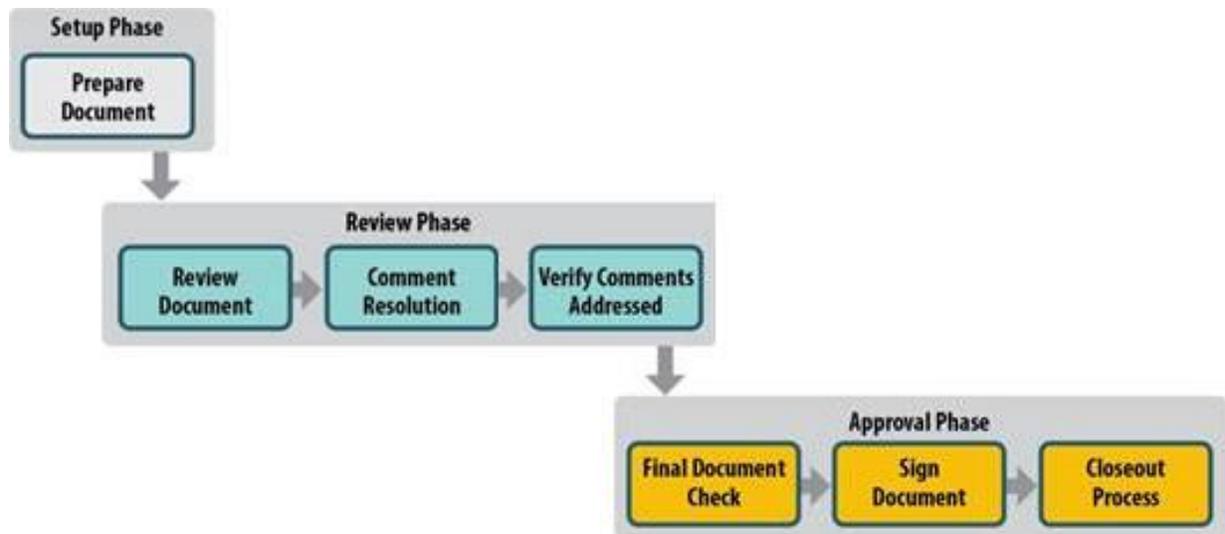
## Chapter 2 NDOT's QC Review Process for NEPA Documentation

The NDOT QC review process can be broken down into three main phases (Setup, Review, and Approval), each with specific purposes and associated tasks (Figure 2-1). This chapter describes by phase, the various tasks and responsibilities for NDOT staff conducting QC reviews, whether the original documentation is prepared internally by NDOT authors or externally by consultants.

A table titled *NDOT Internal QC Review Process for NEPA Documentation* is attached to this document as Appendix B. The table contains a list that has been developed as a desk reference for use by NDOT staff to step them through the QC review process. It is not mandatory that this list be completed for every project, but rather, it is designed as a training tool for use by NDOT staff to become familiar with the formal steps of the internal NDOT QC process. If desirable, however, the NEPA Specialist may complete the table and place it in the project file along with the other QC documentation discussed in this chapter.

Although it is likely that one individual may actually perform several roles in the review process, it is important that the process outlined below be followed sequentially, and documentation of reviews and approvals be filed accordingly in the project folder. In cases where the documentation is of good quality, the review process would proceed without cycling back and forth for further updates and rechecking.

**Figure 2-1. NDOT's QC Review Process Phases and Associated Tasks**



### 2.1 Setup Phase

The purpose of the Setup Phase is to determine whether a document is sufficiently complete to process for independent QC review, gather pertinent documentation and make it accessible for others involved in the QC review process, and generate the accompanying *NEPA Documentation QC Review Form (QC Review Form)* and if deemed most appropriate for the document review, the *Nebraska Department of Transportation QC Comment/Response Matrix (QC Comment/Response Matrix)*.

## 2.1.1 Prepare the Document for QC Review

During the Setup Phase, the NEPA Specialist is responsible for the activities identified in Appendix B1 (specifically the section of the table labeled: Prepare Document). The NEPA Specialist shall stipulate the level of review to be completed by each QC Reviewer, such as the following:

- **Full Document Review:** Detailed review of entire document for content; consistency between document sections and chapters; accuracy; grammar; completeness; and compliance with applicable laws, regulations, and guidelines. This includes review of table of contents, tables, figures, cross-references, appendices, etc.
- **Targeted Technical Review:** A detailed review of document content specific to a QC Reviewer's technical expertise (e.g., biological resources, civil rights) to ensure quality of content, accuracy, compliance with laws and regulations, etc. Often this involves review of not only NEPA document section(s) but also associated technical reports, technical memoranda, or other related information prepared for a specific resource or topic.
- **Second Review:** A higher-level review conducted after full document review or targeted technical reviews have been completed, or a second review to ensure that previous comments or requested changes have been made in the document.

Once the NEPA Specialist has prepared the document for review and set up the project folders, they will then send the *QC Review Form*, *QC Comment/Response Matrix* (or other means as determined appropriate), and the *QC Review Copy* of the draft document to the QC Reviewer(s) in a format determined by the NEPA Specialist in coordination with the QC Reviewer(s) (e.g., hard copy, electronic native file format, PDF format, or other format).

## 2.2 Review Phase

The Review Phase is the heart of the QC review process. It is the step where the document is thoroughly reviewed (Full Document Review) and commented on by independent reviewers not involved in the document preparation. Targeted Technical Reviews and Second Reviews may also be performed during this phase. Comments are received, confirmed, and negotiated if necessary; and the document is revised in this phase. The steps and number of review cycles within this phase vary depending on the level of NEPA documentation, the quality of the draft document, the number and complexity of comments received, and the comment resolution process. The NEPA Specialist is responsible for identifying the type of review expected of QC Reviewer(s), and for tracking the progress of the document through QC reviews using whatever method they establish in concert with the QC Reviewer(s), including but not limited to meetings, telephone calls, or email.

### 2.2.1 Review the Document

The Full Document Review should not be performed by the Document Author, and preferably by someone not directly involved in the project. The person performing the review must meet the qualification requirements described in Section 1.3.1. During the Review Phase, the QC Reviewer is responsible for the tasks identified in Appendix B1 (specifically the section of the table labeled: Review Document). If there are shortcomings in the document that require a comment, then the QC Reviewer should sufficiently articulate what the issue is and how it should be addressed. For challenging topics, the QC Reviewer is encouraged to provide an example of how to respond. The nature of comments can include, but are not limited to, the following:

- More analysis or detail is needed to support conclusions/assertions.

- Specific information is missing (identify what is missing).
- Discussion is unclear (and explain why).

## 2.2.2 Update the Document

All comments are sent to the NEPA Specialist. The NEPA Specialist then consolidates all comments and provides them to the Document Author. When updating the document, the Document Author is responsible for completing the tasks outlined in Appendix B1 (specifically the section of the table labeled: Update Document), and revising the document in accordance with the direction provided by the QC Reviewer(s), unless there is disagreement with the suggested approach. Any disagreements must be resolved with the NEPA Specialist, and in some cases with the EPM, EDU Manager or ESM, before updating the document.

## 2.2.3 Verify Comments Addressed

The NEPA Specialist will have the QC Reviewer(s) check the revised document to verify that all comments have been satisfactorily addressed. When verifying whether comments have been satisfactorily addressed, the tasks identified in Appendix B1 (specifically the section of the table labeled: Verify Comments Addressed), should be performed by document QC Reviewers. Often the focus of this review is on specific areas of the document and performed with a check against the original comment(s). If there are remaining (or new) comments that require attention, the document should be returned to the Document Author until all comments have been satisfactorily resolved.

## 2.3 Approval Phase

Once a document has been through the Review Phase, the document will go through a final verification that comments have been addressed and the document meets all applicable requirements for the level of NEPA documentation and is ready for approval.

### 2.3.1 Final Document Check

The NEPA Specialist is responsible for ensuring that the revised document addresses all comments, and that all necessary QC reviews have been performed and documented. In the case of EAs and EISs, however, the NEPA Specialist will request that this task be performed by the EDU Manager or ESM.

### 2.3.2 Sign the QC Review Form and NEPA Documentation

Once all changes to the document have been checked, the NEPA Specialist may sign the *QC Review Form* documenting compliance with the QC review process and follow the tasks identified in Appendix B1 (specifically the section of the table labeled: Sign the *QC Review Form* and NEPA Documentation). Signature of the *QC Review Form* signifies that the document is ready for approval and should only be signed once a thorough and complete review has been conducted and all outstanding issues have been resolved. In the case of Level 1 CEs, the NEPA Specialist may also sign the CE. For Level 2 CEs, the EDU manager, ESM or EPM can sign the *QC Review Form* and CE. For higher level documents, the EDU Manager or ESM must sign the *QC Review Form*. The NEPA documentation should not be signed without an accompanying *QC Review Form* demonstrating that the document has gone through the QC review process.

### 2.3.3 Closeout QC Review Process

The *QC Review Form* captures all necessary signatures, serves as verification that the QC review process was conducted, and is used as documentation to support QA audits. Once all signatures have been obtained on the *QC Review Form*, the NEPA Specialist will consolidate and save documentation related to comments received from NDOT staff, FHWA, consultants, local agency or regulatory agencies (if applicable), and documentation of comment resolution. In addition to the fully signed *QC Review Form*, documentation may include emails or other correspondence regarding the QC review. The fully signed *QC Review Form*, supporting correspondence, and other documentation generated during the QC review process (e.g., comment/response matrices, emails, etc.) shall be uploaded to OnBase.

## Chapter 3 Quality Assurance Review

Quality Assurance (QA) is an oversight (review) function to ensure and document that the NDOT QC review process is being properly conducted. The purpose and focus of the QA review is to determine whether the QC process is being followed and effectively identifying errors and omissions, and not to revisit specific comments and their resolution. The process is also valuable in determining if there are consistent (programmatic) errors or omissions that are occurring and developing a plan to address them. Findings from the QA review may require modifications to the QC review process outlined in this manual.

Tasks performed in the QA review process are outlined below:

Ongoing Project-Specific QA. NEPA documentation goes through QA/QC at several stages during its development and review (as discussed in Chapter 2 above). Beginning with the initial reviews of resource specific technical reports, early QA/QC activity is intended to prevent late identification of issues that could cause delays or lead to unsupported environmental decisions. Each phase of NDOT's project development process has decision and support documents that are generated and reviewed by NDOT environmental staff. Each of these phases or decision points are supported by various guidance documents that help ensure that adequate and well-supported environmental documents and technical studies are developed. Feedback during the reviews of these documents should be direct and timely to be most productive. Issues that are recurring, precedent setting, or have program-wide implications, should be elevated to the EDU Manager or relevant PQS to keep them abreast of issues and possible corrective action. Lessons learned during the closeout of projects should also be shared with the EPMs, EDU Manager, and ESM to be considered for broader programmatic implementation if warranted.

Ongoing Program-wide QA. The EDU conducts weekly, monthly, and quarterly team meetings to go over recurring issues and share lessons learned. The purpose of the weekly meetings between the EDU and environmental team is to discuss current projects, status of work occurring that week, and any feedback from consultants and/or NDOT personnel, such as on Smartform issues or general issues regarding NEPA documentation. Monthly meetings take place between the EDU and technical resource specialists to discuss program level QA concerns, such as changes to PQS memos. Quarterly meetings are held within the EDU to review standard language and consistency issues such as commitment language and when to check NA versus No. Through these meetings, the EDU Manager, ESM, and EPMs will be afforded numerous and regular opportunities to address program-wide QA/QC issues and provide feedback and direction to NDOT environmental staff. Minutes from these meetings can support and document NDOT's QA/QC program.

NEPA QA Review Team. On an annual basis, the EDU Manager will form a NEPA QA Review Team comprised of two to four individuals from the NDOT Environmental Section. The timing of the QA review process will be coordinated to precede and to inform FHWA's scheduled monitoring reviews (CE Assignment) or audit reviews (NEPA Assignment), as defined by their respective MOU's.

NEPA Documentation Sampling. NDOT will compile a statistically random sample of projects for use in the QA Review (see next bullet). The sample will include documents from all levels of complexity (all CE levels, EAs, EISs, and Re-evaluations), and internal as well as consultant prepared documents. The sample will include documentation generated during the QC review process, such as *QC Review Form* and Comment/Response matrices.

Scope of QA Reviews. The NEPA QA Review Team will review the documentation from each of the sampled projects for the following measures, which are consistent with the performance measures likely to be monitored by FHWA when monitoring CE Assignment or auditing NEPA Assignment:

- Compliance with NEPA, as demonstrated by following the procedural requirements outlined in 40 CFR 1500-1508.
- Compliance with FHWA NEPA regulations and guidance, as demonstrated by following the procedural requirements outlined in 23 CFR 771, FHWA's Technical Advisory T6440.8A, and formal agreements between NDOT and FHWA.
- Compliance with other federal environmental statutes and regulations, as demonstrated by following the requirements of the federal statutes and associated regulations (e.g., Section 106 of the National Historic Preservation Act and 36 CFR 800; Section 4(f) of the U.S. Department of Transportation Act of 1966 and 23 CFR 774).
- Compliance with state environmental statutes and regulations when applicable and relied upon in the NEPA decision (e.g., Nebraska Administrative Code Title 119, *Rules and 24 Regulations Pertaining to the Issuance of Permits Under the National Pollutant Discharge Elimination 25 System*).
- Sufficient documentation in the project record to demonstrate that compliance has been met. For example, is there documentation to support conclusions and findings in the document?
- Project record includes documentation that the QA/QC process was followed, as demonstrated by a completed *QC Review Form* or comparable form of documentation.
- Compliance with NDOT's environmental document content standards and procedures, including those related to QA/QC. These standards may be found in the most recent NDOT Environmental Procedures Manual, or other guidance related to specific resources (e.g., Section 106 Guidance).

Summary of Annual QA Review Findings. The NEPA QA Review Team will produce a memo summarizing the findings of each Annual QA Review and identify action items. The memo shall address each of the measures identified above, and deficiencies will be categorized as project specific, resource specific, or recurring/program-wide. Each recurring or program-wide deficiency should be accompanied by at least one recommendation that will address the issue and eliminate or reduce future occurrences. The memo may be shared with FHWA as is, or may be tailored to better meet FHWA's audit requirements.

Feedback. The NEPA QA Review Team will provide feedback to environmental staff and consultants, and include corrective actions for problem areas. Feedback may occur in the form of staff meetings, trainings, or memos/directives from the EDU Manager or other NDOT Managers/PQSS.

# Appendix A: Consultant QA/QC Certification Statement

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## A.1 Consultant QA/QC Certification Statement

Dear XXXXXXXX,

The enclosed documentation has been prepared by experienced and technically competent professionals, as identified in the <Insert Firm Name> NDOT-Approved NEPA Studies Qualifications submittal. An independent Quality Control review has been completed by:

<Insert Name, Title>

The documentation has been reviewed for completeness, accuracy, consistent terminology, and formatting. It is grammatically well-written and is understandable by the general public. The documentation has been reviewed for compliance with NDOT Guidance Manuals and applicable federal, state, and local laws and regulations. It has been prepared in compliance with the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, 40 CFR § 1500-1508; FHWA Environmental Impact and Related Procedures, 23 CFR § 771; and FHWA Technical Advisory 6640.8A.

I can attest to the quality, accuracy, and completeness of <Insert Document Title, Date, and Version>. In my professional opinion, the quality of this documentation meets the following standards expected by NDOT:

- Subject Matter Accuracy
- Readability/Grammatical Accuracy
- Consistency with available NDOT and FHWA and other guidance, manuals, regulations and laws under NEPA.

Sincerely,

<Insert Name>

Contract Project Manager



## Appendix B: NDOT Internal QC Review Process for NEPA Documentation

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## B.1 NDOT Internal QC Review Process for NEPA Documentation

Project Name:
Project Number:
Control Number:
Document Name/Version/Date:

Task	Performed by:	Activities
<b>Prepare Document</b>	NEPA Specialist	<ul style="list-style-type: none"> <li><input type="checkbox"/> Ensure document is sufficiently complete for review.</li> <li><input type="checkbox"/> Identify and make accessible all supporting documents.</li> <li><input type="checkbox"/> Complete top portion of <i>QC Review Form</i>.</li> <li><input type="checkbox"/> Complete top portion of <i>QC Comment/Response Matrix</i> (optional use).</li> <li><input type="checkbox"/> Create pdf of document with lines numbered (EAs, EISs only).</li> <li><input type="checkbox"/> Compile supporting documentation into pdf portfolio.</li> <li><input type="checkbox"/> Name all documents and pdf portfolios per NDOT naming convention.</li> <li><input type="checkbox"/> Send <i>QC Review Form</i>, <i>QC Comment/Response Matrix</i> (if appropriate), and <i>QC Review Copy</i> to QC Reviewer(s).</li> <li><input type="checkbox"/> Provide QC Reviewer with deadline for review (e.g., specific day) and level and format of review requested.</li> </ul>
<b>Review Document</b>	Independent NEPA Specialist, EPM, PQS, Unit/Division staff, EDU Manager, or ESM with comparable experience in preparing level of documentation being reviewed.	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review the <i>QC Review Copy</i> of the document and any instructions from NEPA Specialist.</li> <li><input type="checkbox"/> Check document against applicable procedures, standards, and guidelines.</li> <li><input type="checkbox"/> Make comments per one of the approved review methods (<i>QC Comment/Response Matrix</i>, track changes, redline markups on hard copy, or email).</li> <li><input type="checkbox"/> Indicate on <i>QC Review Form</i> what review level and tracking method was used, then sign and date.</li> <li><input type="checkbox"/> Return <i>QC Review Form</i> and draft document to NEPA Specialist.</li> <li><input type="checkbox"/> NEPA Specialist consolidates all comments.</li> </ul>
<b>Update Document</b>	Document Author	<ul style="list-style-type: none"> <li><input type="checkbox"/> Revise <i>QC Review Copy</i> of document and save with a new version number and date.</li> <li><input type="checkbox"/> Incorporate comments received from QC Reviewer(s).</li> <li><input type="checkbox"/> Ensure revisions are consistently carried throughout entire document and no other conflicts are created.</li> <li><input type="checkbox"/> Sign and date <i>QC Review Form</i>.</li> <li><input type="checkbox"/> (Optional): If comments from QC Reviewer(s) are extensive, unclear, or challenging, the person performing the updates is advised to submit a revised document to the QC Reviewer(s) or seek clarification and direction through comment resolution.</li> <li><input type="checkbox"/> The Document Author returns revised document to NEPA Specialist for distribution to the QC Reviewer(s) to ensure comments are resolved.</li> </ul>
<b>Verify Comments Addressed</b>	Generally, the same person who served as the principal reviewer.	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review <i>QC Review Copy</i> of document against all comments received from the QC Reviewer(s).</li> <li><input type="checkbox"/> Identify any comments not sufficiently addressed.</li> <li><input type="checkbox"/> Resolve any differences with the Document Author.</li> <li><input type="checkbox"/> Refer irreconcilable differences between the QC Reviewers to the EPM, EDU Manager, ESM, or appropriate PQS for resolution.</li> <li><input type="checkbox"/> Indicate on the <i>QC Review Form</i> the level of review performed.</li> <li><input type="checkbox"/> Sign and date the <i>QC Review Form</i>, and return the <i>QC Review Form</i> and <i>QC Review Copy</i> of the document to the Document Author.</li> </ul>

Task	Performed by:	Activities
Final Document Check	Generally, the NEPA Specialist, but in some instances, EPM, EDU Manager or ESM may perform this work themselves.	<input type="checkbox"/> Conduct final check of document to ensure comments have been satisfactorily addressed.
Sign the <i>QC Review Form</i> and NEPA Documentation	NEPA Specialist for Level 1 CEs, EPM for Level 2 CEs, EDU Manager or ESM for higher level documents	To approve CE Level 1 documentation, the NEPA Specialist will: <ul style="list-style-type: none"> <li><input type="checkbox"/> Sign the <i>QC Review Form</i> on the line labeled: NEPA Specialist Signature.</li> <li><input type="checkbox"/> Sign the CE Level 1 Form.</li> </ul> To approve a CE Level 2 or higher document, the NEPA Specialist will: <ul style="list-style-type: none"> <li><input type="checkbox"/> Sign the <i>QC Review Form</i> on the line labeled: NEPA Specialist Signature.</li> <li><input type="checkbox"/> Forward the <i>QC Review Form</i> and final document to the EPM, EDU Manager, or ESM for their signature.</li> <li><input type="checkbox"/> EPM will sign the <i>QC Review Form</i> and CE Level 2 Form.</li> <li><input type="checkbox"/> EDU Manager or ESM will sign <i>QC Review Form</i> and NEPA Documentation to the extent allowable under current delegation of signatory authority.</li> </ul>
Closeout QC Review Process	NEPA Specialist	<input type="checkbox"/> The fully signed <i>QC Review Form</i> , supporting correspondence and other documentation generated during the QC Review Process should be uploaded to OnBase.

# Appendix C: NEPA Documentation QC Review Form

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## C.1 NEPA Documentation QC Review Form (Blank)

Project Name:
Project Number:
Control Number:
Document Name/Version/Date:

(Add additional rows to list below as required by number of review cycles.)

Task Performed	Review Method	Name	General Comments	Signature	Date
<input type="checkbox"/> Dropdown	<input type="checkbox"/> Dropdown				
<input type="checkbox"/> Dropdown	<input type="checkbox"/> Dropdown				
<input type="checkbox"/> Dropdown	<input type="checkbox"/> Dropdown				
<input type="checkbox"/> Dropdown	<input type="checkbox"/> Dropdown				
<input type="checkbox"/> Dropdown	<input type="checkbox"/> Dropdown				
<input type="checkbox"/> Dropdown	<input type="checkbox"/> Dropdown				
<input type="checkbox"/> Dropdown	<input type="checkbox"/> Dropdown				

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### QC Review is Complete – Document Is Ready For Approval

NEPA Specialist Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

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### Final Review for CE Level 1+ - Acknowledgement of Satisfactory Comment Resolutions

Reviewer/NEPA Specialist Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

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### Final Review for CE Level 2+ - Acknowledgement of Satisfactory Comment Resolutions

EPM Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

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### Final Review for CE Level 3, EAs, EISs - Acknowledgement of Satisfactory Comment Resolutions

EDU Manager Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

## C.2 NEPA Documentation QC Review Form (CE level 2 Example)

Project Name: 21st Street Resurfacing
Project Number:
Control Number: CN12345
Document Name/Version/Date: CN12345_21 <sup>st</sup> Street Resurfacing Cat EX_02102017_QC Review Copy

(Add additional rows to list below as required by number of review cycles.)

Task Performed	Review Method	Name	General Comments	Signature	Date
<input type="checkbox"/> Prepare	<input type="checkbox"/> N/A	Jane Doe NEPA Specialist	Request full review of CE, wetland resources technical report, and Public Meeting summary. Project folder established at:		February 1, 2017
<input type="checkbox"/> Full Document Review	<input type="checkbox"/> Matrix	Mary P – NEPA Specialist	Conducted full review of document. Due to likely issues with wetlands, I forwarded CE and wetland report to PQS for focused review on wetlands and my comments.		February 12, 2017
<input type="checkbox"/> Targeted Tech Review	<input type="checkbox"/> Email	John X – Wetland PQS	See email for response to wetland and 404 permit approach.		February 17, 2017
<input type="checkbox"/> Update	<input type="checkbox"/> N/A	Jane Doe NEPA Specialist	Revised document according to PQS's email, and comments from independent NEPA Specialist (Mary X).		February 21, 2017
<input type="checkbox"/> Second Review	<input type="checkbox"/> N/A	Mary P – NEPA Specialist	Reviewed and confirmed that my comments and those of the PQS were addressed.		February 23, 2017
<input type="checkbox"/> Final Check	<input type="checkbox"/> N/A	Jane Doe NEPA Specialist	Verified document is ready for management review and signature of QC Review Form and CE.		February 24, 2017
<input type="checkbox"/> Approve	<input type="checkbox"/> N/A	Matt Thomas – EPM	Made minor change to CE, see saved changes with _MT extension, signed QC Review Form and CE.		February 25, 2017

### QC Review is Complete – Document Is Ready For Approval

NEPA Specialist Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Jane Doe \_\_\_\_\_

### Final Review for CE Level 1+ - Acknowledgement of Satisfactory Comment Resolutions

Reviewer/NEPA Specialist Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

### Final Review for CE Level 2+ - Acknowledgement of Satisfactory Comment Resolutions

EPM Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_Matt Thomas\_\_\_\_\_

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**Final Review for CE Level 3, EAs, EISs - Acknowledgement of Satisfactory Comment Resolutions**

EDU Manager Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

### C.3 NEPA Documentation QC Review Form (EA Example)

<b>Project Name:</b> Northwest Viaduct
<b>Project Number:</b>
<b>Control Number:</b> CN54321
<b>Document Name/Version/Date:</b> CN54321_Northwest Viaduct_EA_02102017_QC Review Copy
<b>Requested date to complete review:</b> May 15, 2017

(Add additional rows to list below as required by number of review cycles.)

Task Performed	Review Method	Name	General Comments	Signature	Date
<input type="checkbox"/> Prepare	<input type="checkbox"/> N/A	Jane Doe – NEPA Specialist	Request full review of EA, EA appendices (Alternatives Evaluation, Agency Coordination, and Public Involvement), wetland resources technical report, noise technical report, and Phase I Environmental Site Assessment. Project folder established at:		February 1, 2017
<input type="checkbox"/> Full Document Review	<input type="checkbox"/> Matrix	Mary X – NEPA Specialist	Conducted full review of EA and appendices. Due to likely issues with wetlands, I forwarded EA and noise technical report to PQS for focused review on noise impacts and my comments.		February 10, 2017
<input type="checkbox"/> Targeted Technical Review	<input type="checkbox"/> Email	Frank X – Noise PQS	See email for response to noise impact discussion and suggested mitigation measures.		February 11, 2017
<input type="checkbox"/> Targeted Technical Review	<input type="checkbox"/> Matrix	Jim X – Biology PQS	Reviewed biological and water resource/floodplain sections. Sections looked good; only minor comments		February 12, 2017
<input type="checkbox"/> Targeted Technical Review	<input type="checkbox"/> Matrix	Joe X – Cultural Resource PQS	Reviewed Section 106 section and Section 4(f) Evaluation. Minor comments provided in comment matrix.		February 13, 2017
<input type="checkbox"/> Targeted Technical Review	<input type="checkbox"/> Matrix	Dana X – AQ and Noise PQS	Reviewed air quality and noise sections, as well as noise tech report. Several comments but they are minor.		February 14, 2017
<input type="checkbox"/> Update	<input type="checkbox"/> N/A	Jane X – NEPA Specialist	Incorporated comments into EA document and appendices for comments assigned to me.		February 28, 2017
<input type="checkbox"/> Update	<input type="checkbox"/> N/A	John X – Biology PQS	Addressed comments in bio and water resource/floodplain sections of EA and water resources tech report that were assigned to me.		March 2, 2017
<input type="checkbox"/> Update	<input type="checkbox"/> N/A	Pat X – Hazmat PQS	Addressed comments in haz mat section and Phase I ESA for comments assigned to me after comment resolution discussion with Jane and EDU Manager.		March 4, 2017
<input type="checkbox"/> Second Review	<input type="checkbox"/> N/A	Jim X – Biology PQS	Reviewed and confirmed that my comments on biological and water resource/floodplain sections were addressed.		March 4, 2017

Task Performed	Review Method	Name	General Comments	Signature	Date
<input type="checkbox"/> Second Review	<input type="checkbox"/> N/A	Joe X – Cultural Resource PQS	Reviewed and confirmed that my comments on 106 and 4f were addressed.		March 4, 2017
<input type="checkbox"/> Final Check	<input type="checkbox"/> N/A	Jane Doe – NEPA Specialist	Verified comments on EA and tech reports have been appropriately addressed and the EA is ready for management review and signature of QC Review Form and EA.		March 12, 2017
<input type="checkbox"/> Final Check	<input type="checkbox"/> N/A	Dale Jared – EPM	Performed Final Check that EA meets NDOT standards for content, made minor changes with _DJ extension, and recommend EA for EDU signature.		March 17, 2017
<input type="checkbox"/> Approve	<input type="checkbox"/> N/A	John Knox – EDU Manager	Signed QC Review Form and EA		March 18, 2017

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**QC Review is Complete – Document Is Ready For Approval**

NEPA Specialist Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Jane Doe \_\_\_\_\_

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**Final Review for CE Level 1+ - Acknowledgement of Satisfactory Comment Resolutions**

Reviewer/NEPA Specialist Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

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**Final Review for CE Level 2+ - Acknowledgement of Satisfactory Comment Resolutions**

EPM Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Dale Jared \_\_\_\_\_

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**Final Review for CE Level 3, EAs, EISs - Acknowledgement of Satisfactory Comment Resolutions**

EDU Manager Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_ John Knox \_\_\_\_\_

# Appendix D: QC Comment / Response Matrix

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