

NDOT NEPA File Management and Documentation Guidance

As part of fulfilling NEPA responsibilities, NDOT must retain project and general administrative files. To that end, decision-making documents must be included in the project files within NDOT's document management system, OnBase. Resource specific guidance, the Environmental Process Outline (EPO), and the Environmental Procedure Manual's Chapter 3, "Project Documentation and Administrative Record" prescribes the documents to be included in the project file. The Federal Highway Administration (FHWA) will perform a monitoring review on NEPA actions and project files to ensure all required documentation is present.

OnBase Overview

This guidance contains information regarding OnBase, NDOT's primary document management system for purposes of maintaining project files. OnBase has been identified by the State of Nebraska, Office of the Chief Information Officer (OCIO) as a durable medium for purposes of meeting State record retention requirements (see Appendix A).

OnBase incorporates a security system based upon User Groups that reflect individual roles and responsibilities at NDOT. Documents are checked in and out to a single user for editing purposes. Only those with established permissions and who are included in the correct User Group may edit or delete the document. All others have Read-Only access. For example, a NEPA Specialist may edit and delete NEPA documentation; however, an Ecologist may not. Similarly, an Ecologist may edit or delete a Biological Assessment; however, a NEPA Specialist may not.

The OnBase file architecture is document centric, meaning documents are defined based upon *document types*. *Document type* refers to common categories of documents which are typically included in a project file. NDOT Divisions are responsible for identifying documents to be retained in OnBase for general documentation purposes and/or to document decision-making, which leads to the formal creation of a *document type* by NDOT OnBase Administrators. Documents are retrieved within OnBase using filters that incorporate *document types*, *keywords*, and other metadata. OnBase *document types* and *keywords* used to upload documents of the environmental decision-making process are listed in the "NDOT Complete File Checklist" (Appendix B). As an example, the Floodplain Permit is stored in OnBase as "NDOT PD Waterway Permits – Floodplain Permit". "NDOT PD Waterway Permits" is the *document type* and "Floodplain Permit" is the *keyword*. Appendix C contains *Frequently Asked Questions*.

File names are automatically generated by OnBase. Documents contained in OnBase are retained in accordance with retention schedules approved by the Nebraska Secretary of State and will be used to prepare the Administrative Record in the event of litigation. NDOT retention schedules are reviewed internally for applicability and to ensure consistency with record-keeping requirements set forth in various State and Federal laws.

NDOT Complete File Checklist

The NDOT Complete File Checklist is used after NEPA documentation approval and prior to completion of the project's Green Sheet to review the project file for completeness (Appendix B). A draft Green Sheet is required prior to the final Project Coordination Meeting (PCM), and a final Green Sheet is required prior to PS&E project

turn-in. Prior to completion of the Green Sheet, the technical specialist assigned to the project will use the "Yes" selection in the form to identify the documents that are required for maintaining a complete project file and to ensure those documents have been uploaded to their correct file location on OnBase. An "N/A" (Not Applicable) selection indicates the listed document was not created and is not required for the project file. The Environmental Project Manager assigned to the project will review the selections made, approve the checklist with a signature and date, and upload it to *NDOT PD Complete File Checklist*. The checklist is updated when new *document types* and *keywords* are created that are required for the complete project file.

The Complete File Checklist is only one tool in helping to ensure a complete project file. NEPA Re-evaluations that occur after the completion of the Complete File Checklist can generate additional decision-making documentation (see EPM Chapter 7, "Re-evaluation"). NEPA Re-evaluations will be uploaded to OnBase using the document type and keyword "NDOT PD NEPA Documentation – NEPA Re-evaluation". NEPA Re-evaluations will not require the Complete File Checklist to be revised as the checklist is only a review of project file documentation at a particular time in project development.

Public Record Requests & Freedom of Information Act (FOIA)

NDOT provides access to public information in accordance with the Nebraska Public Records Act and NDOT's Public Record Requests Protocol, attached as Appendix D. Although FOIA is the legal term for requests made to the federal government, this term is often used generally to refer to public record requests made to NDOT under the Nebraska Public Records Act. Requests for public records may be submitted to NDOT by using a [link](#) on NDOT's webpage, or by sending a request to NDOT via email or mail.

APPENDIX A

Durable Medium Compliance Documentation for the OCIO's Enterprise Content Management Hosting Service

Revision Date: January 12, 2015

The Secretary of State as State Records Administrator, through Rule and Regulation adoption authority, developed the following definition of Durable Medium, which is found at [430 NAC Ch. 1, § 001.18](#), effective October 31, 2009.

Durable Medium Definition

Durable medium shall be any information storage medium that is created by a durable process. A process shall be the combination of hardware, software, storage media, techniques and procedures used to manage, create, store, retrieve, and delete information belonging to the custodian agency.

A process shall be a durable process if it meets all of the following criteria:

- (1) The process is capable of creating and storing information for the required records retention period as specified by the Records Retention and Disposition Schedules approved by the State Records Administrator and the State Archivist;

RESPONSE:

Agencies can enter specific records retention periods into the Enterprise Content Management (ECM) software and assign these periods to their record types. The ECM software then can either automatically purge the information pursuant to the assigned period, or allow an agency Records Officer to purge the information or take such other actions as appropriate. The ECM software can also send permanent records to the State Archivist.

- (2) The process can be migrated to a successor process when necessary and will retain all information available in the original process after migration to the successor process;

RESPONSE:

The data in ECM is stored natively and on the OCIO SAN which makes the information accessible through other methods without compromising the information.

- (3) The process maintains the integrity of information in a readily accessible manner, makes it retrievable, makes it processable through an established usual or routine set of procedures using available hardware and software, and makes it accurately reproducible in a human readable form as determined by the needs of the custodian agency;

RESPONSE:

The data in ECM is stored natively and on the OCIO SAN which makes the information readily accessible, retrieval and processable through the ECM software and hardware or through other methods.

- (4) The process provides for disaster recovery backups, which are periodically, depending on a retention schedule, verified for restorability and readability, and can be stored in a separate geographical location from the original information.

RESPONSE:

Agencies provide the OCIO ECM Team with a backup schedule as defined in schedule 124-128 and 124-131. Those backups are stored in a different physical location. The OCIO ECM team once a year will randomly take one of the backups and restore it for verification.

- (5) The process is demonstrated to create and maintain information for the retention period as specified, in an accurate, reliable, trustworthy, dependable and incorruptible manner.

RESPONSE:

The ECM Hosting Service through the use of the ECM software and hardware has demonstrated the accuracy, reliability, trustworthiness, dependability and incorruptibility of the information in ECM.

- (6) The process allows the removal of information when it reaches the end of its required retention period.

RESPONSE:

See response to criteria (1) above.

- (7) The process is documented so as to demonstrate to a reasonable person compliance with these criteria.

RESPONSE:

The information provided in this document demonstrates that ECM meets the Durable Medium definition.

Written Best Practices and Procedures may be developed as voluntary guidelines for use by any agency in furtherance of implementation of the above definition of durable medium, as it relates to records retention and disposition schedules. Any Best Practices and Procedures developed are guidelines only and do not have the force and effect of rule and regulation or of law.

RESPONSE:

ECM has established guidelines and best practices on how agencies can setup their record retention processes in ECM.

GENERAL RESPONSE: This compliance documentation is limited to the functionality of the ECM Hosting Service. Custodial agencies are responsible for the format of their data and compliance with the Durable Media requirements.

Appendix B

NDOT Complete File Checklist

As part of fulfilling NEPA responsibilities, NDOT must retain project and general administrative files. To that end, every decision-making document must be included in the project files within NDOT's document management system, OnBase. Resource specific guidance, the Environmental Process Outline (EPO), and the Environmental Procedure Manual, Chapter 3, "Project Documentation and Administrative Record" prescribes the documents to be included in the project file.

Prior to completion of the Green Sheet, technical specialists assigned to the project will use the "Yes" selection in the form to identify the documents that are required for maintaining a complete project file, and to ensure those documents have been uploaded to their correct file location on OnBase. An "N/A" (Not Applicable) selection indicates the listed document was not created and is not required for the project file. The Environmental Project Manager assigned to the project will review the selections made, approve the checklist with a signature and date, and upload it to *NDOT PD Complete File Checklist*. See NDOT File Management and Documentation Guidance.

Project Name:

CN:

Water Resources		
Wetland Survey (NDOT PD Wetland Delineations – Attachment 1, Desktop Determination, PRELIMINARY WETLAND DETERMINATION, FINAL WETLAND DETERMINATION)	Yes ☐	N/A ☐
Section 404 Non-Notifying Memo (NDOT PD Waterway Permits – Non-Notifying Memo)	Yes ☐	N/A ☐
Section 404 Permit Application (NDOT PD Waterway Permits – 404 Permit Application)	Yes ☐	N/A ☐
Section 404 Permit Authorization (NDOT PD Waterway Permits – 404 Permit Authorization)	Yes ☐	N/A ☐
Section 404 Permit Correspondence (NDOT PD Waterway Permits – 404 Permit Correspondence)	Yes ☐	N/A ☐
401 WQC, Title 117 Authorization, Section 10 (NDOT PD Waterway Permits – Other)	Yes ☐	N/A ☐
Site Development Plan (NDOT PD Waterway Permits – Site Development Plan)	Yes ☐	N/A ☐
Floodplain Permit Application(s) (NDOT PD Waterway Permits – Floodplain Permit Application)	Yes ☐	N/A ☐
Floodplain Permit(s) (NDOT PD Waterway Permits – Floodplain Permit)	Yes ☐	N/A ☐
Additional Decision-Making Documentation (NDOT PD Waterway Permits - Other)	Yes ☐	N/A ☐
Historic/Cultural Resources		
Section 106 PQS Memo (NDOT PD Historic Properties – Section 106 Tier I, II, III, PQS Memo)	Yes ☐	N/A ☐
Section 106 Supplemental Evaluation(s) (NDOT PD Historic Properties – Section 106 Supplemental Evaluation)	Yes ☐	N/A ☐
Section 106 Project Package	Yes ☐	N/A ☐

(NDOT PD Historic Properties – Section 106 Project Package)		
Tribal Consultation Log (NDOT PD Historic Properties – Tribal Consultation)	Yes ☐	N/A ☐
ACHP e106 Form (NDOT PD Historic Properties – ACHP e106 Form)	Yes ☐	N/A ☐
Tribal or Agency Agreements with NDOT (NDOT PD Historic Properties – Agreement Document)	Yes ☐	N/A ☐
Additional Decision-Making Documentation (NDOT PD TRU Pre-Letting Correspondence – HISTORIC PROPERTIES)	Yes ☐	N/A ☐
Threatened and Endangered Species		
T&E No Effect Memo (NDOT PD Threatened and Endangered Species – NO EFFECT AGREEMENT MEMO)	Yes ☐	N/A ☐
T&E Re-evaluation Memo (NDOT PD Threatened and Endangered Species – REEVALUTATION MEMO)	Yes ☐	N/A ☐
Biological Assessment (NDOT PD Threatened and Endangered Species – BIOLOGICAL ASSESSMENT)	Yes ☐	N/A ☐
Species Survey Report (NDOT PD Threatened and Endangered Species – SPECIES SURVEY REPORT)	Yes ☐	N/A ☐
NGPC Concurrence (NDOT PD Threatened and Endangered Species – NGPC Concurrence)	Yes ☐	N/A ☐
USFWS Concurrence (NDOT PD Threatened and Endangered Species – USFWS Concurrence)	Yes ☐	N/A ☐
FHWA Signature Document (NDOT PD Threatened and Endangered Species – FHWA SIGNATURE DOCUMENT)	Yes ☐	N/A ☐
Tribal Lands Coordination (NDOT PD Threatened and Endangered Species – TRIBAL OR OTHER AGENCY)	Yes ☐	N/A ☐
Other Agency Coordination (NDOT PD Threatened and Endangered Species – OTHER AGENCY)	Yes ☐	N/A ☐
Early Agency Coordination (NDOT PD Threatened and Endangered Species – EARLY AGENCY COORDINATION)	Yes ☐	N/A ☐
Additional Decision-Making Documentation (NDOT PD TDU Pre-Letting Correspondence – THREATENED AND ENDANGERED SPECIES)	Yes ☐	N/A ☐
NEPA		
NDOT-53 (NDOT PD NDOT 53)	Yes ☐	N/A ☐
NEPA Determination (NDOT PD NEPA Documentation – Minor Categorical Exclusion; Level 1; Level 2; Level 3; Excess Land Disposal; ERCE)	Yes ☐	N/A ☐
Draft EA/EIS (NDOT PD NEPA Documentation – Draft Environmental Assessment; Draft Environmental Impact Statement)	Yes ☐	N/A ☐
Final EA/EIS (NDOT PD NEPA Documentation – Final Environmental Assessment; Finding of No Significant Impact; Final Environmental Impact Statement; Record of Decision)	Yes ☐	N/A ☐
NEPA Re-evaluation (NDOT PD NEPA Documentation – NEPA Re-evaluation)	Yes ☐	N/A ☐
CE QC Review - NDOT (NDOT PD NEPA Documentation – QC Review - NDOT)	Yes ☐	N/A ☐
CE QC Review - Consultant (NDOT PD NEPA Documentation – QC Review - Consultant)	Yes ☐	N/A ☐
Section 4(f) Property Identification (NDOT PD 4(f) and 6(f) – Section 4(f) Initial Assessment)	Yes ☐	N/A ☐

Section 4(f) Use Documentation <i>(NDOT PD 4(f) and 6(f) – Section 4(f) Exception; Determination of Section 4(f) Use; Section 4(f) Individual Evaluation; Section 4(f) Programmatic Evaluation)</i>	Yes ☐	N/A ☐
Section 6(f) Use Documentation <i>(NDOT PD 4(f) and 6(f) – Section 6(f) Conversion)</i>	Yes ☐	N/A ☐
Section 6(f) Consultation <i>(NDOT PD 4(f) and 6(f) – Section 6(f) Consultation)</i>	Yes ☐	N/A ☐
NRCS Farmland Impact Rating Conversion Form <i>(NDOT PD NRCS Farmland Impact Form)</i>	Yes ☐	N/A ☐
Wild & Scenic Rivers or Nationwide Rivers Inventory Coordination <i>(NDOT PD W&SR or NRI)</i>	Yes ☐	N/A ☐
Floodplain PQS Memo <i>(NDOT RD Floodplain PQS Memo)</i>	Yes ☐	N/A ☐
Tribal Lands Consultation <i>(NDOT PD EDU Pre-Letting Correspondence – Tribal Lands Coordination)</i>	Yes ☐	N/A ☐
Public Involvement Report <i>(NDOT COMM Public Involvement Report)</i>	Yes ☐	N/A ☐
PCM Minutes <i>(NDOT RD Project Coordination Meetings – 20; 30; 35; 50; 70; 80; 90)</i>	Yes ☐	N/A ☐
Additional Decision-Making Documentation <i>(NDOT PD EDU Pre-Letting Correspondence)</i>	Yes ☐	N/A ☐
Air, Noise and Hazmat		
Hazmat HMR <i>(NDOT PD Hazardous Materials – Hazardous Materials Review (HMR))</i>	Yes ☐	N/A ☐
Visual Reconnaissance <i>(NDOT PD Hazardous Materials – Site Reconnaissance)</i>	Yes ☐	N/A ☐
ACM Survey <i>(NDOT PD Hazardous Materials – Asbestos Containing Material (ACM) survey report)</i>	Yes ☐	N/A ☐
Phase I/II Environmental Site Assessment <i>(NDOT PD Hazardous Materials – Phase I/II Environmental Site Assessment)</i>	Yes ☐	N/A ☐
Additional Decision-Making Documentation <i>(NDOT PD Hazardous Materials – Other)</i>	Yes ☐	N/A ☐
Air Quality PQS Memo <i>(NDOT PD Air Quality – Mobile Source Air Toxics Report/Memo)</i>	Yes ☐	N/A ☐
Air Study Report <i>(NDOT PD Air Quality – Air Study Report)</i>	Yes ☐	N/A ☐
Noise PQS Memo <i>(NDOT PD Noise Mitigation – Noise Study Determination)</i>	Yes ☐	N/A ☐
Noise Study <i>(NDOT PD Noise Mitigation – Noise Study Report)</i>	Yes ☐	N/A ☐
Tribal Lands Coordination <i>(NDOT PD Hazardous Materials – Tribal Lands Coordination)</i>	Yes ☐	N/A ☐
Impaired Waters, MS4, Section 402		
Additional Decision-Making Documents <i>(NDOT PD RDC Pre-Letting Correspondence)</i>	Yes ☐	N/A ☐
EA/EIS		
Legal Sufficiency Review <i>(NDOT PD NEPA Documentation – Other)</i>	Yes ☐	N/A ☐
Alternatives Analysis Document <i>(NDOT PD NEPA Documentation – Other)</i>	Yes ☐	N/A ☐
Purpose & Need Document <i>(NDOT PD NEPA Documentation – Other)</i>	Yes ☐	N/A ☐

Technical Specialist Comments:

Environmental Project Manager Comments:

Environmental Project Manager Signature:

Date:

APPENDIX C

Frequently Asked Questions about OnBase

1. How are users authorized to access OnBase?

- a. Authorized users may be issued either a business-to-business (B2B) or a State of Nebraska (STN) user account.
- b. Each Authorized User is added to appropriate OnBase groups depending on role; user access and/or restrictions (read only/edit) are applied based on user roles and responsibilities and are applied by NDOT OnBase Administrators.
- c. Non-state devices are required to go through RemoteApp and multifactor authentication.

2. How are documents organized within OnBase?

- a. OnBase is document centric, meaning documents are defined by a document type name within OnBase.
- b. NDOT OnBase Administrators have access to create and configure document types.
- c. NDOT OnBase Business Leads (located in each division) have the authority to request creation of new document types as needs are identified.
- d. Document types are retrieved based on keyword metadata associated with each document type.
- e. NDOT construction project documents are indexed by one of two key index values; either the control number (for documents generated prior to construction), or contract id for documents generated as part of construction. Additional standard index values are part of an autofill function that keeps project related metadata (e.g., Control Number) in sync with NDOT's other project systems (e.g., Clarity).

3. How are documents secured within OnBase?

- a. Active Directory Groups
- b. Document type securities

4. How are changes managed within OnBase?

- a. NDOT has established business leads in each division that defined the requirements for OnBase configuration during implementation.
- b. Changes requested are approved by Division leads. Once approved, a Service Ticket is generated. NDOT OnBase developers perform the work in a test environment, the business lead or user will test the changes, and once approved, the developer schedules the changes to be made in the production environment. This process ensures the appropriate business lead authorizes changes, and they are tested before migrating to the production system.

5. Backups/recovery/redundancy – How is information in OnBase protected from major disasters/destruction?

- a. Backups/recovery/redundancy for State Agencies utilizing OnBase is managed by OCIO.

APPENDIX D

Public Records Request & FOIA Protocol



Memorandum

DATE September 1, 2026

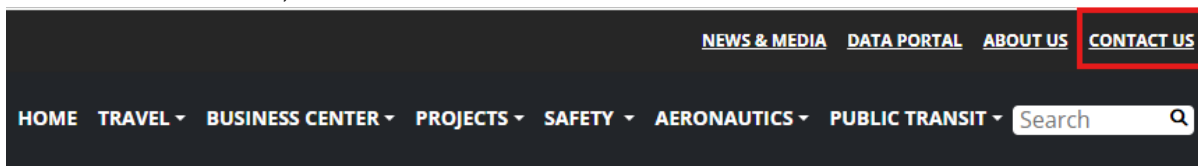
TO File

FROM Kimberly Baker, External Affairs Director

SUBJECT Public Records Request Protocol

1. Formal request for records under the Nebraska Public Records Act is received by the Communications Division Records team.
2. The request for records is screened by the Records team, then distributed to the relevant NDOT record custodian with a fulfillment date.
 - a. If additional time is needed to process the request, the records custodian notifies the Records team, who then notifies the requestor that additional time will be needed to respond. Neb. Rev. Stat. § 84-712(4)
 - b. The records custodian provides a cost and time estimate to the Records team. The Records team notifies requestor of estimated time to fulfil the request and the estimated cost, in accordance with Neb. Rev. Stat. § 84-712(3)(b)
3. Records team prepares the response, in coordination with the NDOT Legal Division.
 - a. NDOT Legal Division reviews for compliance with the Nebraska Public Records Act.
4. Response is provided to the requestor, redacted as necessary, or denied with reason for denial provided. Neb. Rev. Stat. § 84-712.04
5. Response is retained in accordance with retention schedule.

1. Visit the NDOT website, and click on 'Contact Us'.



2. Click on 'Request Public Records'.

A screenshot of the 'Contact Us' page on the NDOT website. At the top, there are five circular icons with labels: 'Contact Us' (envelope icon), 'Map Request' (key icon), 'Publication Request' (document icon), 'District Contacts' (group of people icon), and 'FAQs' (question mark icon). Below these, the 'Contact Us' section is titled. It includes an 'Emergency Concerns' notice and a form with fields for 'Topic', 'County', 'First Name', 'Last Name', 'Email', 'Phone', 'Subject', 'Location', and 'Message'. A 'SUBMIT' button is at the bottom right. To the right of the form, there is a red-bordered box containing a folder icon and the text 'Request Public Records'. Below this, a 'Connect With Us' section lists social media icons (Twitter, LinkedIn, Facebook, Instagram, Email) and provides links to the 'State Employee Directory' and 'Careers' page.

3. Fill out the form:

Request Public Records _____

First Name	Last Name	
Email	Phone	
Address		
City	State	Zip Code
Which records are you requesting? (Include date range if applicable.)		

SUBMIT