

April 2019

Quality Assurance/Quality Control (QA/QC) Plan

For Federal-aid Highway Projects



ADOT Environmental Planning



ADOT

TABLE OF CONTENTS

1	INTRODUCTION	3
1.1	QUALITY ASSURANCE (QA)	3
1.2	QUALITY CONTROL (QC)	3
2	CE ASSIGNMENT AND NEPA ASSIGNMENT	3
2.1	ASSIGNMENT OF FHWA ENVIRONMENTAL REVIEW RESPONSIBILITY	4
2.1.1	<i>CE Assignment - State Assumption of Responsibility for Categorical Exclusions</i>	<i>4</i>
2.1.2	<i>NEPA Assignment - Surface Transportation Project Delivery Program</i>	<i>4</i>
2.2	INVOLVEMENT WITH FHWA	4
2.3	RESPONSIBILITIES	4
2.4	CE ASSIGNMENT MOU REQUIREMENTS.....	5
2.4.1	<i>CE Assignment – Reporting and Annual Self-Assessment.....</i>	<i>5</i>
2.4.2	<i>CE Assignment – FHWA Monitoring.....</i>	<i>5</i>
2.5	NEPA ASSIGNMENT MOU REQUIREMENTS.....	7
2.5.1	<i>NEPA Assignment – Self-Assessments.....</i>	<i>7</i>
2.5.2	<i>NEPA Assignment - Performance Measures</i>	<i>8</i>
3	QUALITY DOCUMENTS.....	11
3.1	TERMINOLOGY.....	11
3.1.1	<i>Environmental Document</i>	<i>11</i>
3.1.2	<i>NEPA Document(s).....</i>	<i>11</i>
3.1.3	<i>Environmental Review Document(s).....</i>	<i>11</i>
3.2	DOCUMENTATION REVIEW.....	11
3.2.1	<i>Documentation Resources</i>	<i>11</i>
3.2.2	<i>Document Readability.....</i>	<i>11</i>
3.3	TYPES OF NEPA DOCUMENTATION.....	12
3.3.1	<i>Categorical Exclusions (CE)</i>	<i>12</i>
3.3.2	<i>Environmental Assessments</i>	<i>12</i>
3.3.3	<i>Environmental Impact Statements</i>	<i>12</i>
3.4	ADMINISTRATIVE RECORD.....	14
4	DOCUMENTATION REVIEW AND APPROVAL.....	15
4.1	QA/QC OF LETTERS	15
4.2	ENVIRONMENTAL REVIEW DOCUMENTS	16
4.2.1	<i>Technical Document Review</i>	<i>16</i>
4.2.2	<i>Review and Approval of CEs.....</i>	<i>16</i>
4.2.3	<i>Review and Approval of EAs and EISs</i>	<i>18</i>
4.3	LEGAL SUFFICIENCY.....	21
4.3.1	<i>Environmental Document File Preparation Requirements and Considerations.....</i>	<i>22</i>
4.3.2	<i>Individual Section 4(f) File Preparation Requirements and Considerations</i>	<i>22</i>
4.4	QA/QC RESOURCES.....	23
5	SECTION 4(F) DOCUMENTS REVIEW AND APPROVAL.....	23
5.1	SECTION 4(F) INVOLVING HISTORIC PROPERTIES.....	24
5.1.1	<i>Reviews for exceptions and de minimis impact involving historic properties:.....</i>	<i>24</i>
5.1.2	<i>Reviews for programmatic and individual Section 4(f) evaluations involving historic properties:</i>	<i>25</i>
5.2	SECTION 4(F) INVOLVING PARKS, RECREATION AREAS, AND WILDLIFE AND WATERFOWL REFUGES	25
5.2.1	<i>Reviews for exceptions and use with de minimis impact involving parks, recreation areas and wildlife and waterfowl refuges:</i>	<i>26</i>

5.2.2	<i>Reviews for programmatic and individual Section 4(f) evaluations involving parks, recreation areas and wildlife and waterfowl refuges:</i>	27
-------	---	----

APPENDIX		28
CE QUALITY CONTROL CHECKLIST		29
INDIVIDUAL CE QUALITY CONTROL FORM		31
EA QUALITY CONTROL CHECKLIST		32
EA QUALITY CONTROL FORM		34
EIS QUALITY CONTROL CHECKLIST		36
EIS QUALITY CONTROL FORM		39
AMENDMENTS TO QAQC PLAN		41

1 INTRODUCTION

The Arizona Department of Transportation's (ADOT) vision is to be the standard of excellence for transportation systems and services. Environmental Planning (ENV – short-hand throughout this document) is committed to conducting quality environmental reviews and producing the highest quality environmental documents in compliance with the National Environmental Policy Act (NEPA) and all related environmental laws affecting transportation project development.

ENV has established this Quality Assurance/Quality Control Plan (QA/QC Plan) to ensure the overall quality and efficiency of the environmental review process. This QA/QC Plan describes Quality Assurance and Quality Control procedures and processes, QA/QC review documentation, document review procedures, quality document production guidance, and the staff responsible for performing activities and verifying compliance. Templates and tools for successfully implementing this QA/QC Plan are also included.

ENV project teams will implement this QA/QC Plan during the preparation and review of environmental documents to meet federal environmental review requirements. This QA/QC Plan is designed to provide directions to assist project teams in meeting these requirements. Provision of quality products and quality service are of utmost importance to ADOT and this QA/QC Plan will be used to help develop quality environmental reviews and documents in delivering ADOT and Local Public Agency (LPA) Federal-aid Highway Program (FAHP) projects.

1.1 Quality Assurance (QA)

Quality Assurance is a system for ensuring a desired level of quality control in the development, production, or delivery of products and services. ENV defines QA as preventing problems, process monitoring, and self-assessment activity on a “program level.” QA is employed at the project level and the management level to ensure that prudent QC procedures and tools are in place and are being carried out with the desired quality compliant products provided. Within ENV the Standards and Training Manager is responsible for overseeing QA. QA includes having the procedures and support documentation in place to successfully conduct environmental document preparation and review. QA also includes self-monitoring through self-assessments as required by the CE and NEPA Assignment MOUs and as described elsewhere in this QA/QC Plan. As part of QA, individual projects and project files are periodically reviewed to ensure that project-specific quality control measures such as document checking and technical reviews are being completed. Through this process, QA provides feedback to those preparing documents and technical studies to ensure continuous improvement.

1.2 Quality Control (QC)

Quality Control is a system for verifying and maintaining a desired level of quality in technical analysis and documentation through the use of proper checking against standards and verification of products. ENV defines QC as the day-to-day effort of identifying and correcting deficiencies and errors and the documentation of those efforts. QC is routinely employed at the production or “project level.”

2 CE ASSIGNMENT AND NEPA ASSIGNMENT

ADOT and the Federal Highway Administration (FHWA) have agreements in place with QA/QC procedure requirements to help deliver the FAHP. Consequently, this QA/QC Plan will assist ADOT in conforming to

the stipulations of the FHWA-ADOT Memorandum of Understanding (MOU) for the *State Assumption of Responsibility for Categorical Exclusions* under 23 U.S.C 326 (CE Assignment) and the MOU between FHWA and ADOT for the *Surface Transportation Project Delivery Program* codified in 23 U.S.C. 327 (NEPA Assignment). This QA/QC Plan ensures that ADOT ENV staff implement the provisions of the MOUs and outlines ADOT approval authority for Categorical Exclusions (CE) listed under 23 CFR 771.117(c) and (d), individually documented CEs under 23 CFR 771.117(d), Environmental Assessments (EA)/Finding of No Significant Impact (FONSI), and Environmental Impact Statements (EIS)/Record of Decision (ROD). A Final EIS is abbreviated as FEIS.

2.1 Assignment of FHWA Environmental Review Responsibility

2.1.1 CE Assignment - State Assumption of Responsibility for Categorical Exclusions

Pursuant to 23 U.S.C. 326, FHWA and ADOT entered into a CE Assignment MOU on January 3, 2018 that assigned to ADOT FHWA's environmental review responsibilities for determining whether certain projects are categorically excluded from the requirement to prepare EAs or EISs. All responsibilities concerning CE determinations not assigned under the CE Assignment MOU are assigned under the NEPA Assignment MOU. The CE Assignment MOU is renewable every three years.

2.1.2 NEPA Assignment - Surface Transportation Project Delivery Program

Pursuant to 23 U.S.C. 327, FHWA and ADOT have entered into a NEPA Assignment MOU on April 16, 2019 that assigned FHWA's environmental review responsibilities to ADOT including the preparation and approval of EAs and EISs as well as the preparation of CEs not assigned under the CE Assignment MOU. The NEPA Assignment MOU is renewable every five years.

2.2 Involvement with FHWA

Pursuant to these MOUs, FHWA cannot provide any project-level assistance to ADOT in carrying out any of the responsibilities assumed under CE Assignment and NEPA Assignment. Project-level assistance is generally defined as any advice, consultation, or document review associated with a particular highway project. However, FHWA may provide program-level assistance concerning interpretation of any applicable law contained in the United States Code, interpretation of any environmental review-related regulation, interpretation of FHWA policies or formal guidance.

For those projects excluded from NEPA Assignment where FHWA remains the Lead Federal Agency ADOT will coordinate with FHWA on environmental documentation review and approval.

2.3 Responsibilities

As a consequence of CE Assignment and NEPA Assignment, ADOT is liable for carrying out the USDOT Secretary's responsibilities it has assumed under Assignment, subject to the limitations of the Eleventh Amendment waiver of sovereign immunity by ADOT.

In assuming the USDOT Secretary's responsibilities under NEPA Assignment and other agreements, ADOT is subject to the same procedural and substantive requirements that apply to the USDOT Secretary in carrying out these responsibilities. Such procedural and substantive requirements include federal laws, federal regulations, Executive Orders, policy, guidance and interagency agreements such as programmatic agreements, memoranda of understanding, memoranda of agreement, and other similar documents that relate to the environmental review process.

2.4 CE Assignment MOU Requirements

The CE Assignment MOU (326 MOU) established certain requirements related to FHWA oversight and reporting. Interagency agreements or memoranda may require revision post-assignment.

2.4.1 CE Assignment – Reporting and Annual Self-Assessment

ADOT ENV is committed to continuous improvement; therefore, performance regarding document quality and delivery is reviewed by supervisors and senior managers.

When monitoring CE quality, ENV will check QC Checklists in the project files for project timeliness and quality based on comments and number of submittals reviewed. This review process will be conducted annually by the ENV Standards and Training Manager as part of Quality Assurance requirements of the 326 Assignment MOU. Based on this review, action may be needed to improve QA/QC. Accordingly the QA/QC Plan will be evaluated and updated and ENV staff will be made aware of the assessment results, process improvements and any revisions made to this QA/QC Plan.

Notably, certain performance monitoring and quality assurance activities are required by FHWA under stipulation IV.(F) of the 326 CE MOU. In conformance with these requirements, ADOT performs the following items:

1. Compile a list of CE determinations and Section 4(f) approvals of use that the state has approved every 6 months. This is to be completed by the ADOT NEPA Assignment Manager and submitted to FHWA by the ENV Administrator.
2. Prepare a self-assessment report summarizing ENV performance under the 326 CE MOU. This is required 30 days prior to a FHWA scheduled monitoring review. This is to be completed by the ADOT ENV Standards and Training Manager or another delegate at the discretion of the ENV Administrator.
3. Maintain electronic project records and general administrative records pertaining to the 326 CE MOU. FHWA may request these project file records which must be provided within five (5) business days. Project files are to be retained for a minimum of three (3) years from completion of project construction.

2.4.1.1 CE Assignment Self-Assessment Report Outline

The 326 MOU self-assessment report has the below outline:

1. Background: Legal citations and MOU requirements
2. Purpose: Provide statistical summary of ADOT performance under 326 MOU
3. Statistical Report of CE and 4(f) approvals: Provide report graphics
4. QC Practices and Processes: Discuss application of QA/QC Plan to 326 MOU Requirements
5. Quality Discussion: Discuss Report Data here.
6. Appendices provide copies of internal data reports

2.4.2 CE Assignment – FHWA Monitoring

FHWA will periodically review ADOT's records and performance under the 326 CE MOU. The CE MOU provides guidance on performance measures that FHWA will consider when evaluating ADOT's performance in the CE Assignment Program. The FHWA-defined quality measures for state performance are provided below.

1. CE decisions are appropriately and timely documented.
ADOT will implement the procedures outlined in this QA/QC Plan. These procedures rely on established ADOT documentation practices developed with FHWA oversight. Such practices are described in this QA/QC Plan and appendices.
2. CE decisions are factually and legally supportable at the time the decision is made.
ADOT has implemented specific project technical review and decision making practices as outlined in this QA/QC Plan and its appendices.
3. CE decision-making complies with 23 CFR 771.117 and the CE Assignment MOU processes.
ADOT implements the procedures outlined in this QA/QC Plan to document ENV project related significant decision points and to note when responsible parties act in accordance with these procedures. As ADOT gathers experience in implementing MOU requirements, this QA/QC Plan, and other ADOT guidance and procedures may be improved and refined in accordance with CE Assignment MOU provisions.
4. The State has met staffing and quality control requirements of the MOU.
ADOT, in the course of expected administrative practice, reviews staff performance, project workloads, and document quality in accordance with employee Human Resource evaluation programs and the Governor's Office of Arizona Management System (AMS) government streamlining and efficiency programs. Such routine review of staff performance and staffing levels are conducted to ensure ADOT meets the requirements of the CE Assignment MOU.
5. The State has complied with other Federal and State legal requirements.
ADOT, during the course of project delivery, reviews projects for applicability with other federal and state programs. Clean Water Act and the Clean Air Act are examples of legal programs ADOT routinely assesses for applicability and impact analysis during the NEPA process. Such assessment is documented according to procedures outlined in this QA/QC Plan.
6. The State has complied with record keeping requirements.
ADOT will implement the procedures outlined in this QA/QC Plan. Conformance with project record keeping requirements will be part of the annual self-assessment.

2.4.2.1 FHWA Monitoring Review Coordination

The NEPA Assignment Manager, working in cooperation with the FHWA Arizona Division, is responsible for the arranging access to necessary information and for ensuring employees are available for FHWA interviews or answering questions. FHWA monitoring coordination requires meeting the following responsibilities:

1. Establish a general schedule in coordination with the FHWA Arizona Division
2. Facilitate monitoring review communication with ENV management, technical teams, and other ADOT operational staff and management
3. Plan for the monitoring review including coordination of file transfers for remote electronic reviews
4. Coordinate the audit visit with FHWA and secure meeting rooms
5. Ensure the availability of personnel during the audit visit
6. Facilitate the monitoring report review of the draft report and acceptance of the final report

2.5 NEPA Assignment MOU Requirements

The NEPA Assignment MOU (327 MOU) established certain requirements related to FHWA oversight and reporting.

2.5.1 NEPA Assignment – Self-Assessments

FHWA will periodically review ADOT's records and performance under the 327 MOU in conformance with stipulation 8.2. Please refer to the 327 MOU for more specific detail regarding FHWA procedures. The following are specific record keeping requirements worth emphasizing from the 327 MOU.

MOU 8.2.5 ADOT shall perform annual self-assessments of its QA/QC process and performance to determine if its process is working as intended. If any process areas are identified as needing improvement, ADOT will take appropriate and timely corrective actions to address such areas. At least one month prior to the date of a scheduled FHWA audit, ADOT will transmit a summary of its most recent self-assessment to FHWA Arizona Division Office. The summary will include a description of the scope of the self-assessment conducted and the areas reviewed, a description of the process followed in conducting the self-assessment, a list of the areas identified as needing improvement, any corrective actions that have been or will be implemented and a statement from ADOT's ENV Administrator concerning whether the processes are ensuring that the responsibilities ADOT has assumed under this MOU are being carried out in accordance with this MOU and all applicable Federal laws and policies, and a summary of ADOT's progress toward attaining the performance measures listed in Part 10 of this MOU.

MOU 8.2.6 Upon the Effective Date of this MOU, ADOT will maintain a list of approved individually documented CEs, EAs, EISs and Section 4(f) determinations.

2.5.1.1 NEPA Assignment Self-Assessment Report Outline

The 327 MOU self-assessment report has the general outline below that may be modified based on individual reporting needs:

1. **Executive Summary**
2. **Results of Self-Assessment**
3. **Program Consistency**
4. **Observations**
5. **General Improvement Opportunities**
6. **Performance Measures**
7. **Self-Assessment Scope**
8. **Previous Self-Assessment Resolution or Follow-up**

2.5.1.2 FHWA Audit Coordination

The NEPA Assignment Manager, working in cooperation with the FHWA Arizona Division, is responsible for arranging access to necessary information and for ensuring employees are available for FHWA interviews or answering questions. FHWA audit coordination requires ADOT meeting the following responsibilities:

1. Establish a general audit schedule within 180 days of the effective date or the anniversary date of the MOU

2. Facilitate audit planning communication with ENV management, technical teams, and other ADOT operational staff and management
3. Plan for the audit, including review of FHWA pre-audit questions, and coordination and scheduling of remote electronic reviews
4. Coordinate the audit visit with FHWA
5. Ensure the availability of files and personnel during the audit visit
6. Review the draft audit report and coordinate with FHWA for the final audit report posting in the Federal Register

2.5.2 **NEPA Assignment - Performance Measures**

To evaluate the success of assignment under the 327 MOU, ADOT established a set of performance measures against which ADOT is evaluated in administering the assigned environmental review responsibilities. ADOT collects and maintains the necessary and appropriate data related to meeting the performance measures and monitors progress toward meeting the performance measures. ADOT reports the results to the FHWA annually. The performance measures contained in the 327 MOU are outlined below. The bold italicized text and the numbering format match the 327 MOU.

A. Compliance with NEPA, FHWA NEPA regulations, and other Federal environmental statutes and regulations:

i. Maintain documented compliance with procedures and processes set forth in this MOU for the environmental responsibilities assumed under the Program.

- Percent of approved environmental documents that have all supporting technical documentation in the project file supporting analysis for NEPA.

[This is a percentage obtained by number of projects with signed NEPA determinations (CE/FONSI/ROD) and with supporting technical reports for Section 4(f), Section 7, Section 106, Clean Air Act, 23 CFR 772 - Noise regulations, as applicable, divided by the total number of projects approved.]

ii. Maintain documented compliance with requirements of all applicable Federal statutes and regulations for which responsibility is assumed (e.g., Section 106 of the NHPA, Section 7 of the ESA, etc.).

- Percent of approved environmental documents that have approvals for other applicable laws in the project file supporting decisions for NEPA.

[This is a percentage obtained by number of projects with signed NEPA determinations (CE/FONSI/ROD) and with supporting approvals for Section 4(f), Section 7, Section 106, Clean Air Act and 23 CFR 772 - Noise regulations, as applicable, divided by the total number of projects approved.]

B. QA/QC for NEPA decisions:

i. Maintain and apply internal quality control and assurance measures and processes, including a record of:

a. Legal sufficiency determinations made by counsel; this shall include the legal sufficiency reviews of Notices of Intent and Notices of Final Agency Action as required by law, policy, or guidance;

- Percent of Federal Register notices reviewed for legal sufficiency prior to publication

[This is a percentage obtained by total number of Notices of Intent and Notices of Final Agency Action reviewed for legal sufficiency prior to publication divided by the total number of notices needing review.]

- Percent of FEIS or FEIS/ROD and individual Section 4(f) evaluations reviewed for legal sufficiency prior to document approval

[This is a percentage obtained by total number of FEIS, FEIS/ROD and individual Section 4(f) evaluations reviewed for legal sufficiency prior to approval divided by the total number of FEIS or FEIS/ROD and individual Section 4(f) determinations.]

b. Compliance with FHWA's and ADOT's environmental document content standards and procedures, including those related to QA/QC; and,

- Percent of individually documented CE's with a CE Quality Control Checklist and the draft environmental documents with a completed EA/EIS Quality Control Checklist in the project file

[Percentage is obtained by total number of projects with documented quality control checklists in the project file divided by total number of projects with approved individually documented CEs and draft environmental documents.]

c. Completeness and adequacy of documentation of project records for projects done under the Program

- Percent of approved final environmental documents with completed CE/EA/EIS Quality Control Form in the project file

[Percentage is obtained by total number of projects with documented quality control forms in the project file divided by total number of projects with approved individually documented CEs and final environmental documents.]

C. Relationships with agencies and the general public:

- i. ***Maintain communication among ADOT, Federal and State resource agencies, and the public from effective date of assumption of responsibilities under this MOU.***

- Agency and public communication

[This is a percentage measuring notification. Percentage is obtained by number of CE/Ea/EIS projects with documented agency and public scoping letters sent by the project divided by the number of projects with letters required to be sent for the project during the scoping phase.]

ii. Maintain effective responsiveness to substantive comments received from the public, agencies, and interest groups on NEPA documents and environmental concerns.

- Rating how well ADOT responds to substantive comments of the public for publically reviewed EA/EIS projects

[This rating is based upon a number of EA/EIS projects that have summary reports including complete comment responses in the project file, following the making of documents available for public comment, divided by the total number EA/EIS projects with public reviews during the period.]

iii. Maintain effective NEPA conflict resolution processes whenever appropriate.

- Rating how well NEPA conflict resolution process on CE/Ea/EIS projects works by not needing to formally escalate an issue involving an outside agency [23 U.S.C. 139(h)(6)]

[This rating is based upon the number of CE/Ea/EIS projects not needing formal escalation divided by the total number of ongoing CE/Ea/EIS project]

D. Increased efficiency and timeliness in completion of NEPA process:

i. Compare time of completion of environmental document approvals before and after assumption of responsibilities under this MOU.

- Time of completion of EAs

[Compare actual project EA delivery production time to historical average before 327 MOU Assignment. Percentage is obtained per project by total number of months to complete EA approvals after NEPA assignment divided by the average total number of months to complete EA approvals before NEPA assignment.]

ii. Report actual time to completion for key interagency consultations (e.g. Section 7 biological opinions, Section 106 resolution of adverse effects)

- Actual time to complete key interagency consultations

[Section 7 Biological Opinions (Section 7 initiation letter to Biological Opinion) and Section 106 resolution of adverse effects (Determination of adverse effect to agreement on resolution)].

3 QUALITY DOCUMENTS

3.1 Terminology

3.1.1 Environmental Document

Environmental document is defined in CEQ regulations 40 CFR 1508.10: “*Environmental document* includes the documents specified in §1508.9 (environmental assessment), §1508.11 (environmental impact statement), §1508.13 (finding of no significant impact), and §1508.22 (notice of intent).” 23 CFR 771 defines environmental document as “EAs and EISs” and CEs as a “designation.”

3.1.2 NEPA Document(s)

Historically in 23 CFR 771 “NEPA documents” referred to EAs and EISs. Though historically referring to EAs and EISs, for convenience and ease of use by staff, ADOT defines “NEPA document” or “NEPA documentation” to mean: listed CE, individually documented CE, EA/FONSI and EIS/ROD.

3.1.3 Environmental Review Document(s)

23 CFR 771 includes the term “environmental review document” which is used synonymously with “environmental document.” ADOT defines environmental review document(s) to mean any documents prepared as part of the environmental review process including technical reports, NEPA documentation and Section 4(f) evaluations.

3.2 Documentation Review

As the Lead Federal Agency under CE and NEPA Assignment, ADOT is responsible for coordination, review and approval of environmental review documents. CEs are prepared for the vast majority of projects. EAs and EISs are completed less frequently and have comprehensive procedures that must be followed. The procedures outlined in this section of the QA/QC Plan ensure consistent review of environmental review documents. The detailed guidance in how to prepare environmental review documents resides elsewhere in specific environmental technical analysis and environmental document preparation guidelines.

3.2.1 Documentation Resources

There are a multitude of resources on the [ADOT Environmental Planning](#) website to support environmental review documents including the; *Categorical Exclusions (CE) Manual*, *EA/EIS Guidance*, *Section 4(f) Manual*, etc. as well as guidance in the various technical areas.

3.2.2 Document Readability

Documents prepared or approved by ENV can be made available to the public (exceptions include documents with confidential cultural resources information). All documents should be written clearly and concisely with accurate information. Documents should be written in plain English. Technical documents may contain highly technical terms and wording, for example, the biology document will identify scientific names of plant and animal species. Environmental documents should contain summary and conclusions from technical reports. Acronyms should be spelled out with the first use. Documents should be written using correct grammar, content, and spelling. Consultant and internally written documents are reviewed for quality and consistency.

The environmental document preparer should strive to follow the requirements of CEQ 40 CFR 1501.7 and §1502.7 regarding excessive paperwork and page limits. CEQ “40 Questions” recommends the

length of EAs be limited to 10 to 15 pages. The “EA may incorporate by reference background data to support its concise discussion of the proposal and relevant issues.” ADOT EAs may exceed these limits but environmental documents should include only enough information from the technical reports to provide a basis for how a decision was made. CE Checklists are also prepared with CEQ goals in mind with technical information and consultations prepared separately and residing in the project file.

Environmental documents should be written clearly, concisely and based on facts, not opinion. In short, the environmental documents should 1) tell the story, 2) keep it brief, and 3) comply with the regulations.

Document review and approval procedures are outlined under Chapter 4 - Documentation Review and Approval.

3.3 Types of NEPA Documentation

3.3.1 Categorical Exclusions (CE)

A CE is an action that, based on FHWA’s past experience, normally does not involve significant environmental impact and therefore does not require the preparation of an EA or EIS. CEs are documented and approved using the CE Checklist which was developed in conformance with 23 CFR. 771. The detailed guidance for preparing CE Checklists is outlined in ADOT ENV’s *Categorical Exclusions (CE) Manual*. The “listed CEs” are prepared and approved by ADOT under the CE Assignment MOU. Individually documented and approved CEs are approved by ADOT under the NEPA Assignment MOU. Approval of the CE Checklist by the ENV Administrator documents completion of NEPA requirements for a federal action. NEPA approval is needed for federal actions (FHWA authorizations) that include federal funding for design, right-of-way and construction as well as administrative approvals such as a Change in Access of the Interstate and approval of design exceptions on the National Highway System.

3.3.2 Environmental Assessments

An EA may be prepared for an action that does not appear to involve significant impacts but does not qualify for a CE. EAs are normally prepared with the expectation that the project will qualify for a FONSI after the appropriate environmental analysis and public review and comment. The guidance for preparing an EA is outlined in the ADOT *EA/EIS Guidance*. EAs are not required to follow the Efficient Environmental Review process (23 U.S.C. 139); however, agency and public scoping are conducted for ADOT EAs.

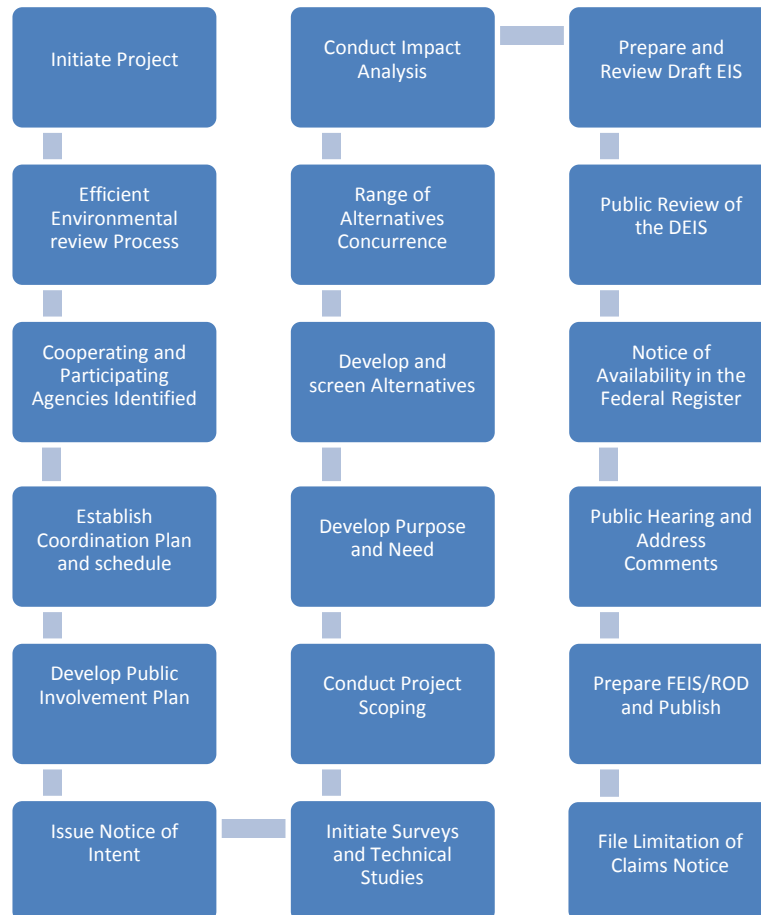
The public review period for an EA is 30 days unless the EA incorporates an individual Section 4(f) evaluation in which case the Department of Interior (DOI) is given 45 days for review of the document. The draft EA must be available for public review for 30 days and made available 15 days before a public hearing. The Environmental Planner, Project Manager and ADOT Communications Public Information Officer must plan for a public hearing in conformance with the [ADOT Public Involvement Plan \(PIP\)](#). There should be an understanding of the date the EA will be ready for public review and project team agreement on a public hearing date before one is committed to. No Federal Register notice is required for an EA though coordination with Communications is required to provide a public notice.

3.3.3 Environmental Impact Statements

An EIS is prepared for an action that has known significant impacts on the environment. The guidance for preparing an EIS is outlined in the ADOT *EA/EIS Guidance*. An EIS is required to follow the Efficient

Environmental Review process outlined in 23 U.S.C. 139. Though initiated in sequence there are many steps in the process that will overlap and be conducted in parallel with other steps in the process. General procedures are depicted as follows but are flexible in order to meet the needs of a particular project and to implement Executive Order 13807 – One Federal Decision as needed.

EIS Process Flow



The general steps are depicted above are a precursor to the document review steps outlined in this QA/QC Plan. Project development and environmental review documents steps are defined elsewhere. Similarly, the steps outlined below are to ensure that they happen and do not outline the full procedures (SOP).

3.3.3.1 USDOT Permitting Dashboard

The Permitting Dashboard is an online tool for Federal agencies, project developers, and interested members of the public to track the Federal government's environmental review and authorization processes for large or complex infrastructure projects, part of a government-wide effort to improve coordination, transparency, and accountability.

A major function of this Dashboard is to track infrastructure projects designated as Covered Projects under Title 41 of the Fixing America's Surface Transportation Act (FAST-41). The Dashboard also

provides information on certain projects subject to Titles I, IX, and XI of the FAST Act (DOT projects), as well as other infrastructure projects. The Dashboard projects are those covered under 42 U.S.C. 4370m–1(c)(1)(A). ADOT is responsible for updating projects on the Dashboard as required of FHWA.

3.3.3.2 Prior Concurrence

Prior concurrence reviews are put in place for FHWA Headquarters reviews of FHWA Division decisions for projects that are highly controversial or involve issues of national policy or program significance. With ADOT ENV's centralized structure this exact model cannot be emulated because EISs are not approved at a "District level" which would be equivalent to an FHWA "Division level" if ADOT decision making was decentralized. Regardless, concurrent reviews could possibly be required on occasion that mirror 23 CFR 771.125(c). ADOT Multimodal Planning Division Director has been selected to conduct any prior concurrence reviews. MPD would review the Draft EIS concurrently with the NEPA Assignment Manager and legal pre-review. MPD would also review the FEIS concurrently with the NEPA Assignment Manager and Legal Sufficiency Review. See FHWA's [Guidance on FHWA Prior Concurrence Procedures for EISs](#) for more information.

3.3.3.3 EIS Submittal to U.S. EPA

Following the Council on Environmental Quality's NEPA regulations at 40 CFR 1506.9, ADOT is required to submit all EISs, together with comments and responses, to the U.S. Environmental Protection Agency (EPA) in California – Region 9. The EPA will prepare a [Notice of Availability](#) for publication in the Federal Register. All [submissions to EPA](#) must be made [electronically](#) via U.S. EPA's "[e-NEPA system](#)." ADOT has designated staff with access to the e-NEPA system for document submittals. In addition to the e-NEPA submission, the Environmental Planner will coordinate with the EPA Region 9 Office to determine the number of hard copies to submit.

3.3.3.4 Federal Register Notices

ADOT does not have the authority to submit documents directly to the Federal Register such as the Notice of Intent under 23 CFR 771.123(a) and Notice of Final Agency Action under 23 USC 139(l). ADOT must transmit these documents to FHWA's Arizona Division Office, and the FHWA will then submit these to the Federal Register on behalf of ADOT. FHWA is required to submit these documents to the Federal Register in a timely manner upon receipt from ADOT.

For an EIS ADOT must transmit the Draft, Final, or Supplemental EIS to the EPA. EPA will then prepare the Notice of Availability for publication in the Federal Register.

3.3.3.5 Limitations on Claims

Under 23 CFR 771.139 ADOT can issue a limitation on claims notice in the Federal Register that reduces the statute of limitations for challenging a federal agency decision for a project from 6 years to 150 days. ADOT will make use of the 150 day statute of limitations for those projects as deemed necessary by the Environmental Planning Administrator. The NEPA Assignment Manager is responsible for coordinating the placement of the notice in the Federal Register with the FHWA Arizona Division.

3.4 Administrative Record

40 CFR 1505.1 requires that decisions be made in accordance with the policies and purposes of NEPA and to demonstrate decisions were not arbitrary and capricious. For all projects the project folder in the ENV-Drive will serve as the repository of documentation that would be used to create an administrative

record if needed. When a legal challenge is filed, ENV will verify (with the advice of legal counsel) that decisional documents from the Project File be made part of an administrative record. The Environmental Planner and Technical Specialists are responsible for maintaining the project files that would support an administrative record.

For an EIS, an Administrative Record organizational framework is created at the start of the project. For an EA the Environmental Planner should consider creating an Administrative Record organizational framework at the start of the project. The regular project file may contain drafts and final documents, various communications, public outreach materials, etc. The Administrative Record generally will contain project final documents, and those documents memorializing process and decision related records.

The Administrative Record will be needed if the State is sued for a project environmental decision. The Administrative Record is what the Court will use in deciding any lawsuits filed. The Arizona Attorney General's Office (AGO) may request additional documentation that was not included. Some projects can take many years to complete and staff may change on the project over time. This is why it is important to document decisions throughout the project development process.

Creation of the administrative record should be discussed early in the process when beginning the scope of the work for an EIS and when discussing scope of the consultant tasks. For additional guidance see the [AASHTO Practitioner's Handbook 01 "Maintaining a Project File and Preparing an Administrative Record for a NEPA Study"](#) and the [FHWA online Toolkit](#). Though a consultant may set up and maintain an administrative record the Environmental Planner is the responsible person for the Administrative Record.

4 DOCUMENTATION REVIEW AND APPROVAL

4.1 QA/QC of Letters

All agency letters for projects that fall under the CE and NEPA Assignment MOUs are reviewed for quality, substance and suitability. Contact information should be verified before letters are sent.

The following letters should be reviewed as follows:

- Cooperating and Participating agency letters are reviewed by a Senior Planner.
 - The Wetland Biologist also reviews letter sent to the Corps. The Biologist reviews cooperating agency letters sent to the USFWS. Other technical areas review letters to other agencies as needed.
- Section 106 consultation letters are reviewed by the HPT Team Lead or Cultural Resources Program Manager
- Section 7 consultation letters are reviewed by the Biology Team Lead or Biology Program Manager

If an Environmental Planner or technical specialist prepares scoping or agency letters a peer review by another Planner or supervisor is required. The Environmental Planner or technical specialist performs this review if letters are prepared by an environmental consultant. Contact lists should be verified by the consultant. For projects excluded from NEPA Assignment (per the 327 MOU), the FHWA letter format and protocols for review and approval shall be followed.

4.2 Environmental Review Documents

Document review and approval procedures are described below.

4.2.1 Technical Document Review

All project technical documents submitted by consultants or local agencies are to be reviewed by the assigned Technical Specialists. Prior to final approval, all biology documents prepared by ADOT biology staff will be reviewed by another ENV Staff member. Reviews should verify all project information is correct and the scope of work is consistent with all NEPA documents.

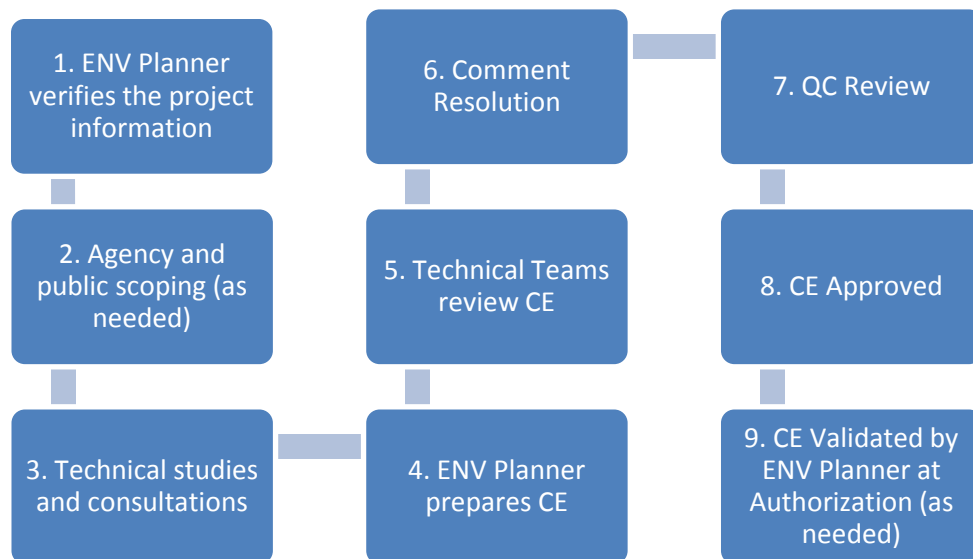
After the first submittal of a technical report there should be a meeting or phone conversation between the Technical Specialist and the consultant to discuss any unresolved comments or questions on the technical reports. No more than two report review submittals are expected. If the Technical Specialist needs assistance from their supervisor, they may request their supervisor also review the document.

If consultants have submitted technical documents to the Technical Specialists directly, the Environmental Planner should be notified of the submittal by the Technical Specialist and be included in comment responses and resolution.

4.2.2 Review and Approval of CEs

Environmental Planner is responsible for overseeing the completion of CE Checklists for all projects. CEs are developed in accordance with the requirements outlined in ADOT ENV's *Categorical Exclusions (CE) Manual*. ADOT CE and ADOT CE Checklist are synonymous since the approval is included with the Checklist.

CE Review Process



4.2.2.1 CE Review and Approval Process

The following steps are conducted for CE review and approval:

1. Environmental Planner verifies the project scope of work/project description/limits and confirms programming data as applicable
2. Environmental Planner conducts environmental scoping with agencies and public (as outlined in CE Scoping Guidelines)
 - Scoping letters sent by email
 - Additional public scoping (as needed)
3. Technical Teams conduct technical studies and consultations as required
 - Technical determinations, and any project specific mitigation measures, are provided to the Environmental Planner for documenting in the CE
4. Environmental Planner prepares the CE
5. Technical Teams review CE
 - Technical specialists review any relevant technical area documented in a CE as well as project information and any mitigation measures to ensure consistency with technical documents and consultation.
 - Environmental Planner sends a copy of any individually documented CE prepared under 23 CFR 771.117(d) to the ADOT Civil Rights Office concurrently with the Technical Specialists review
6. Comment resolution (as needed).
 - Environmental Planner ensures that technical comments are addressed and ensures copies of any substantive technical review comments are placed in the Project File
7. Environmental Planner provides the CE to a Senior Planner/peer reviewer for a QC review. The reviewer completes the [CE Quality Control Checklist](#) and provides a copy with any comments on the CE to the Environmental Planner. A copy of the checklist is placed in the project file.
 - A QC Quality Control Checklist is not required for a (c)(1) CE.
 - The Environmental Planner prepares the final CE for signature and sends to the approver.
 - Environmental Planner prepares a [CE Quality Control Form](#) for any individually documented CE prepared under 23 CFR 771.117(d). The NEPA Assignment Manager certifies that the CE is ready for approval. This form is only for CEs completed under the NEPA Assignment MOU.

8. ENV Administrator or delegate (NEPA Assignment Manager, Project Delivery Manager or Environmental Programs Manager) approves the CE.
 - The CE Approver verifies the CE determination (type of CE selected) made by the preparer of the CE is appropriate for the described action
9. The Environmental Planner validates the CE at the time of the request for federal authorization. There should be no additional review required at this stage of the process. The following statement is contained in the validation letter:
 - “ADOT certifies that NEPA requirements consistent with the scope of work of the project have been met and the project incorporates all environmental commitments per 23 CFR 771.109(d).”
 - Note; a CE re-evaluation, which may need time for additional technical evaluation, must be identified, discussed with the project team and approved prior to this final step of validating a CE at the time of the request for FHWA authorization.

4.2.3 Review and Approval of EAs and EISs

The assigned Environmental Planner is responsible for overseeing the completion of EAs and EISs. EAs and EISs are developed in accordance with the requirements outlined in the ADOT ENV’s *EA/EIS Guidance* and other environmental technical guidance.

Note: “[EA/EIS Quality Control Checklist](#)” referenced in this section of the Plan indicates either the “EA Quality Control Checklist” or the “EIS Quality Control Checklist” as appropriate. The “[EA/EIS Quality Control Form](#)” referenced in this section of the Plan indicates either the “EA Quality Control Form” or the “EIS Quality Control Form” as appropriate.

Draft EA/EIS Review Process



4.2.3.1 Review and Approval of Draft EA and Draft EIS

1. The initial draft environmental document is submitted by the consultant to the Environmental Planner (or the ADOT Project Manager if so arranged)
 - a. Environmental Planner ensures that the preceding technical reports that support project decisions are completed
 - b. Environmental Planner documents in the [EA/EIS Quality Control Form](#) that the consultant has included a QC statement in the submittal of the draft environmental document including the names of reviewers
 - i. Working drafts of documents or sections of documents may be reviewed prior to receiving the 1st draft environmental document with the consultant's QC certification
2. Environmental Planner (or Project Manager) distributes the initial draft environmental document to the appropriate members of the project team including the Project Manager (Environmental Planner), ADOT Civil Rights Office, Communications, District and the Technical Specialists for their concurrent review.
 - a. The Environmental Planner includes a review due date in the distribution email. Review timeframes are specified in the *Environmental Planning Review Timeframe Guidelines* in the ADOT ENV [Project Development Procedures](#)
 - b. Depending on project complexity the Environmental Planner may also provide a copy of the first submittal document to their supervisor or to a peer for a concurrent review (not mandatory)
 - c. Only one submittal for review and comment by the project team is expected. Complex projects may require an additional draft(s) or sections of the draft for review and comment before the NEPA Assignment Manager/legal pre-review.
3. QC Review
 - a. The Environmental Planner completes the [EA/EIS Quality Control Checklist](#)
 - b. The Environmental Planner documents in the [EA/EIS Quality Control Form](#) that the Technical Specialists and any other reviews as needed have been completed
4. Comment Resolution completed
 - a. A comment resolution meeting is held to ensure critical comments in need of formal discussion and resolution will be adequately addressed. This resolution can also take place by email confirmation if there are no major issues that need discussion.
 - b. The revised draft submittal goes back to the Technical Specialist or others if the comments were highly technical within the specific discipline, difficult in nature, or if requested by the reviewer

5. Draft environmental document is sent to the NEPA Assignment Manager and the AGO for legal pre-review
 - a. A legal pre-review for an EA is optional. A legal pre-review for a draft EIS is required by ADOT (not a federal regulatory requirement)
 - b. A second project team review may be necessary depending on the quality of the first submittal and the successful resolution of all first review comments
 - c. Comment Resolution for NEPA Assignment Manager and legal comments completed
6. Cooperating Agency review (as needed or agreed upon in a Coordination Plan if applicable)
7. Draft environmental document ready for approval
 - a. Environmental Planner ensures the NEPA Assignment Manager, legal pre-review and Cooperating Agency (if applicable) comments are addressed
8. The NEPA Assignment Manager documents the [EA/EIS Quality Control Form](#) acknowledging that the QC review, technical reviews, and legal pre-reviews (if required) have been conducted and that the draft document is ready for approval by the ENV Administrator
9. Approval of the draft environmental document for Public Review
 - a. The NEPA Assignment Manager or the Project Delivery Manager can approve a draft EA in the absence of the ENV Administrator. The approver must be different than the one who signs the [EA/EIS Quality Control Form](#)
 - b. The State Engineer's Office approves a Draft EIS in the absence of the ENV Administrator

4.2.3.2 Review and Approval of Final EA/FONSI and Final EIS/ROD

The Environmental Planner is responsible for overseeing the review and approval of final EAs and final EIS/RODs.

1. In cooperation with ADOT Communications and the Project Manager ensure that all public and agency comments and responses to substantive comments are accounted for and addressed
 - a. The approach strategy to respond to the comments should be agreed-upon by the project team. This strategy would include responding to all comments vs. grouping comments with generalized responses.
 - b. Comment resolution is conducted, in cooperation with agencies as needed, for any outstanding comments or issues
2. The Environmental Planner and project team review the draft final environmental document and resolve any additional comments as needed
3. Environmental Planner provides the draft final environmental document to the NEPA Assignment Manager and the AGO for QC and legal sufficiency review (required for an EIS)

- a. A legal sufficiency review may be conducted for an EA but there is no federal legal sufficiency requirement. The final EA must be sent for legal sufficiency review if it contains a Section 4(f) evaluation that does not utilize one of the programmatic evaluations or is a *de minimis* impact.
4. The NEPA Assignment Manager's review comments and any legal sufficiency review comments are sent to the consultant for incorporation into the final environmental document
5. The Environmental Planner ensures the NEPA Assignment Manager and legal sufficiency review comments are addressed
 - a. A revised draft final environmental document is sent to the AGO (if necessary). Individual sections or pages reflecting comment resolution may be sent in lieu of the full document if acceptable to the AGO.
 - b. A statement of legal sufficiency from the AGO for an EIS, or an individual Section 4(f) determination if included with an EA, must be included in the project file
 - c. Legal sufficiency review procedures are outlined in Section 4.3
6. The NEPA Assignment Manager completes the [EA/EIS Quality Control Form](#) acknowledging that the QC and a legal sufficiency reviews have been conducted and that the document is ready for approval
7. The ENV Administrator approves the Final EA/FONSI or FEIS/ROD*
 - a. The NEPA Assignment Manager or the Project Delivery Manager can approve an EA/FONSI in the absence of the ENV Administrator. The approver must be different than the one who signs the [EA/EIS Quality Control Form](#)
 - b. State Engineer's Office approves a FEIS/ROD in the absence of the ENV Administrator
 - c. *A separate FEIS and ROD would both follow Steps 3 through 5 concurrently as separate documents

4.3 Legal Sufficiency

The legal sufficiency review of an environmental document is an important element in ADOT's overall project development process. The following procedures instruct ENV staff in the preparation of project files for a legal sufficiency review of a FEIS or a final Section 4(f) evaluation prior to signature approval by the responsible authority. In other words, all relevant project and environmental files are complete in final form except for an approval signature on the EIS or individual Section 4(f) at the time of legal sufficiency review.

Legal sufficiency reviews are conducted by the AGO or by specialized outside environmental counsel appointed by AGO and funded by ADOT. When conducting a legal sufficiency review, the attorney will assess the document from the perspective of legal standards, litigation risk and legal defensibility. The assessment will consider whether the document was properly developed and whether it answers substantive questions which could be reasonably raised. This assessment will focus on the adequacy of

the essential NEPA and/or Section 4(f) elements. Are the decision elements suitably supported? This review will also document any significant readability concerns of legal import.

Adherence to the procedures and recordkeeping outlined in this section of the QA/QC Plan shall constitute evidence of the adequacy of the legal sufficiency determination made by counsel.

Legal sufficiency review requests will be made by the Environmental Planner and accompanied by the following documents:

1. A transmittal memo signed by the Environmental Planner requesting a legal sufficiency review
2. A paper copy of the document to be reviewed
3. An electronic copy of the document in MS Word format with track changes enabled
4. An electronic copy of each technical study in .pdf format
5. A copy of the EA/EIS Quality Control Checklist

4.3.1 Environmental Document File Preparation Requirements and Considerations

1. Purpose and Need Statement
2. Discussion of Alternatives
3. Indirect and cumulative effects analysis
4. Scope of review of environmental resources and any significant impact to, and mitigation for, those resources (e.g. air, water, vegetation, Section 7, cultural resources, environmental justice etc.)
5. Coordination with local, tribal, and resources agencies, and documented responses to concerns raised
6. Availability for public review and comment, and adequacy of responses to those comments; and
7. Whether all applicable requirements have been substantially satisfied (including laws, regulations, executive orders, FHWA policies, and ADOT guidance.)

4.3.2 Individual Section 4(f) File Preparation Requirements and Considerations

1. Section 4(f) applicability determination
2. How is the Section 4(f) document presented in the file-stand alone or included in an EA
 - a. An EIS legal sufficiency review could include a Section 4(f) Evaluation
3. Alternatives Analysis using Feasible and Prudent Standard including avoidance and least harm analysis (if required)
4. Identification and discussion of minimization and/or mitigation measures
5. Consultation and coordination with agency owning or administering the Section 4(f) resource; FHWA if a constructive use determination, Department of Interior, Housing and Urban Development and US Department of Agriculture
6. Section 4(f) conclusion and determination

Upon submission from ADOT, the reviewing attorney shall ensure receipt of all documents prior to conducting the review. The attorney will document receipt of files to ADOT. The review shall commence the first business day after documented receipt of complete files. ADOT has a goal of 22 days for completion of legal sufficiency review. Prior notice may allow schedules to accommodate a shorter review time by eliminating "Queue time."

The attorney will provide to ADOT when the review is completed; the dates the attorney sent comments to and to whom, the dates responses were received, any follow-on discussions and the date of final legal sufficiency. These procedures apply to both Environmental Documents and Section 4(f) reviews.

ADOT will make changes to the document and submit revisions through generally accepted ENV document review process. The goal of this process is to complete revisions within 10 business days. ADOT will provide to AGO or reviewing attorney the following:

1. A transmittal memo or suitable electronic document stating the document has been revised pursuant to legal sufficiency review and requesting AGO acceptance of changes made.
2. A copy of revised document in MS Word format with track changes showing additions and deletions.
3. A copy of comment matrix and with comment responses

Upon acceptance of changes and completion of final review, the attorney will forward the legal sufficiency review, comments, and legal sufficiency finding to the ADOT ENV Administrator. This finding will contain the following language:

“I have reviewed the proposed Final Environmental Impact Statement (FEIS) [and/or Section 4(f) evaluation] for the Project (Federal Project Number), which proposed to build [short description of the project and its location]. Pursuant to the provisions of 23 CFR § 771.125(b) [and/ or 23 CFR §774.7(d)], I find the proposed FEIS [and/or Section 4(f) evaluation] for this project to be legally sufficient.

In order to ensure that the legal sufficiency review is conducted on a final document, subsequent changes to the document already reviewed for legal sufficiency, from any source, must be reviewed by the attorney to assess any implications on the finding of legal sufficiency. It is the NEPA Assignment Manager’s responsibility to ensure any subsequent changes are referred to the reviewing attorney.

If the attorney is reviewing an EA, the attorney sends a memo to the Environmental Planning Administrator stating the document “is ready for signature.”

4.4 QA/QC Resources

The following documents are available to support quality assurance in developing documents and quality control in reviewing them:

- [#15 Preparing High-Quality NEPA Documents for Transportation Projects](#)
- [Improving the Quality of Environmental Documents](#)
- [FHWA Memorandum on Improving the Quality of NEPA Documents](#)

5 SECTION 4(F) DOCUMENTS REVIEW AND APPROVAL

This section only provides guidance on how to process projects with potential Section 4(f) resources; it does not provide guidance on conducting Section 4(f) evaluations. Please reference 23 CFR 774, the [FHWA Policy Paper](#) and the ADOT *Section 4(f) Manual* for more information on how to identify and evaluate Section 4(f) properties and impacts.

CEs, at a minimum, document that there is “no Section 4(f) use” on the CE Checklist. An EA and EIS will document whether or not Section 4(f) properties are involved in a project. Additional forms have been incorporated in the *Section 4(f) Manual* to provide documentation if there is a question of whether or not a property is a Section 4(f) property or if a Section 4(f) use is questioned. Equivalents that amount to “negative declarations” are not required in every instance to document when Section 4(f) is *not* applicable. For example projects on the Interstate that fall within applicability requirements of 23 CFR

774.11 do not require additional Section 4(f) documentation. A paving project within the existing transportation right-of-way requires no Section 4(f) documentation beyond that in the CE.

Note; the Cultural Resources Program Manager can perform all of the duties of the HPT Team Lead in regard to Section 106 and Section 4(f) document review and approval. The NEPA Assignment Manager may delegate Section 4(f) review to the suitable staff within Environmental Planning.

5.1 Section 4(f) Involving Historic Properties

HPT Specialists are responsible for identifying (with the assistance of the project team and consultants) historic Section 4(f) resources. If a potential Section 4(f) property is identified within or near a project's Area of Potential Effect (APE) the HPT Specialist coordinates with the HPT Team Lead and the Environmental Planner for consideration *as needed and appropriate* for the project circumstances. Such information *could* include:

- ✓ A description of the project with emphasis on the potential 4(f) resource(s) boundaries
- ✓ A preliminary assessment regarding applicability of the potential Section 4(f) property under 23 CFR 774.11 and what exception may apply under 23 CFR 774.13
- ✓ Potential Section 4(f) use and, if so, what type (temporary, permanent or constructive)
- ✓ Recommended Section 4(f) processing option for the project as appropriate (documenting applicability, no use, exceptions, *de minimis* impact, or programmatic or individual evaluation)

The HPT Team Lead consults with the ENV Administrator as needed and communicates concurrence or provides direction to the HPT Specialist and Environmental Planner in regard to the issues in question. If warranted the HPT Specialist documents the decisions made on projects in which there is a question of whether or not a historic property is a Section 4(f) property or if a potential Section 4(f) impact use is in question. The “**No Section 4(f) Property/Use Form**” may be used to document the decision. Note that a “**No Section 4(f) Property/Use Form**” is not required for every lack of a Section 4(f) property or no use of a Section 4(f) property on a project.

5.1.1 Reviews for exceptions and *de minimis* impact involving historic properties:

Exceptions

- a. HPT Lead reviews all Section 106 consultation letters that include Official with Jurisdiction (OWJ) coordination. Section 106 compliance is used by ADOT for the application of exceptions outlined in 23 CFR 774.13.
- b. HPT prepares a **Section 4(f) Applicability/Exceptions Form** to document exceptions applied under 23 CFR 774.13 for historic properties for HPT Lead approval.

De minimis Impact

- a. HPT Lead reviews all Section 106 consultation letters that include OWJ coordination for a Section 4(f) use. The letter includes a statement that ADOT intends to make a *de minimis* impact determination.
- b. HPT prepares the **Section 4(f) De Minimis Impact on Historic Properties Form** for HPT Lead approval the form. ENV Administrator may also approve the form.

5.1.2 Reviews for programmatic and individual Section 4(f) evaluations involving historic properties:

1. The Environmental Planner, HPT, and ENV Administrator discuss and agree on processing options of a Section 4(f) use with a programmatic or individual Section 4(f) evaluation
2. The Environmental Planner and HPT Specialist work with the consultant team to develop the initial Section 4(f) document
3. The Environmental Planner provides the initial Section 4(f) document to the HPT Team Lead, and the AGO for an individual Section 4(f) evaluation, for QC and legal pre-review
 - a. The Environmental Planner may also elect to have the NEPA Assignment Manager review the document. Note the NEPA Assignment Manager or delegate must review the document if Section 4(f) properties other than historic properties are involved.
4. The HPT Lead's review comments and any legal comments received are sent by the Environmental Planner to the consultant for incorporation into the final draft Section 4(f) document
5. The Environmental Planner and HPT Specialist ensure any NEPA Assignment Manager and legal reviewer comments are addressed
6. Individual Section 4(f) evaluations shall be provided to the OWJ over the Section 4(f) resource and to the Department of the Interior, and as appropriate, to the Department of Agriculture and the Department of Housing and Urban Development. A minimum of 45 days for review and receipt of comments shall be provided.
7. The Environmental Planner ensures a Legal Sufficiency statement is included in the project file for a final individual Section 4(f) evaluation (if not included in an EIS)
8. ENV Administrator approves programmatic and individual Section 4(f) evaluations
 - a. The HPT Team Lead or NEPA Assignment Manager can approve a Section 4(f) evaluation involving a historic property in the absence of the ENV Administrator.

Constructive Use

If there is a potential for a Section 4(f) use that requires a constructive use consideration the decision on the Section 4(f) processing approach is to be made by the ENV Administrator. Constructive use determinations require coordination and approval from FHWA Headquarters through the FHWA Arizona Division.

5.2 Section 4(f) Involving Parks, Recreation Areas, and Wildlife and Waterfowl Refuges

Environmental Planners are responsible for identifying (with the assistance of the project team and consultants) publicly owned parks, recreational areas, and wildlife and waterfowl refuges as Section 4(f) resources. If a potential Section 4(f) property is identified within or near a project's study area or footprint the Environmental Planner coordinates with the Project Delivery Manager or the NEPA Assignment Manager for consideration *as needed and appropriate* to the project circumstances. Such information *could* include:

- ✓ A description of the project with emphasis on the potential 4(f) resource(s) boundaries
- ✓ A preliminary assessment regarding applicability of the potential Section 4(f) property under 23 CFR 774.11 and what exception may apply under 23 CFR 774.13
- ✓ Potential Section 4(f) use and, if so, what type (temporary, permanent or constructive)
- ✓ Recommended Section 4(f) processing option for the project as appropriate (documenting applicability, no use, exceptions, *de minimis* impact, or programmatic or individual evaluation)

The Project Delivery Manager or NEPA Assignment Manager consults with the ENV Administrator as needed and communicates concurrence or provides direction to the Environmental Planner in regard to the issues in question. A decision is made before coordination with an OWJ is initiated.

The Environmental Planner documents the decisions made on projects in which there is a question of a potential Section 4(f) property or if a potential Section 4(f) impact use is in question. The “**No Section 4(f) Property/Use Form**” may be used to document the decision. Note that a “**No Section 4(f) Property/Use Form**” is not required for every lack of a Section 4(f) property or no use of a Section 4(f) property on a project.

5.2.1 Reviews for exceptions and use with *de minimis* impact involving parks, recreation areas and wildlife and waterfowl refuges:

Exceptions

- a. For approval of exceptions the Environmental Planner completes the **Section 4(f) Applicability/Exceptions Form** and emails the draft form to the Project Delivery Manager or NEPA Assignment Manager for review.
 - i. The ENV Administrator is included in the draft form transmittal when there is an exception applied that requires OWJ concurrence
- b. The ENV Administrator, or delegate, approves the **Section 4(f) Applicability/Exceptions Form**

De minimis Impact

- a. Environmental Planner coordinates with the NEPA Assignment Manager or Project Delivery Manager before initiating contact with the OWJ when there is a Section 4(f) use with a *de minimis* impact determination
- b. The Environmental Planner emails the draft **Section 4(f) De Minimis Impact on Public Parks, Recreational Areas and Wildlife and/or Waterfowl Form** to the Manager for review
- c. After a draft has been reviewed the Environmental Planner ensures coordination and public involvement requirements are conducted
- d. Environmental Planner signs the **Section 4(f) De Minimis Impact on Public Parks, Recreational Areas and Wildlife and/or Waterfowl Form** and the ENV Administrator approves the form

5.2.2 Reviews for programmatic and individual Section 4(f) evaluations involving parks, recreation areas and wildlife and waterfowl refuges:

1. The Environmental Planner, NEPA Assignment Manager and ENV Administrator discuss and agree on processing options of a Section 4(f) use with a programmatic or individual Section 4(f) evaluation
2. The Environmental Planner and HPT Specialist work with the consultant team to develop the initial Section 4(f) document
3. Environmental Planner provides the initial Section 4(f) document to the NEPA Assignment Manager, and the AGO for an individual Section 4(f), for QC and legal pre-review
4. The NEPA Assignment Manager's review comments and any legal comments are sent to the consultant for incorporation into the final draft Section 4(f) document
5. The Environmental Planner ensures any NEPA Assignment Manager and legal review comments are addressed
6. Individual Section 4(f) evaluations shall be provided to the OWJ over the Section 4(f) resource and to the Department of the Interior, and as appropriate to the Department of Agriculture and the Department of Housing and Urban Development. A minimum of 45 days for review and receipt of comments shall be provided.
7. The Environmental Planner ensures a Legal Sufficiency statement is included in the project file for a final individual Section 4(f) evaluation (if not included in an EIS)
8. ENV Administrator approves programmatic and individual Section 4(f) evaluations
 - a. The NEPA Assignment Manager can approve a Section 4(f) evaluation involving a park or refuge in the absence of the ENV Administrator.

Constructive Use

If there is a potential for a Section 4(f) use that requires a constructive use consideration the decision on the Section 4(f) processing approach is to be made by the ENV Administrator. Constructive use determinations require coordination and approval from FHWA Headquarters through the FHWA Arizona Division.

APPENDIX

CE Quality Control Checklist

Project Data:	
Project Name: Route or Location: Environmental Planner:	ADOT Project Number: Federal-Aid Number: CE Reviewer:

Project Information	
Yes <input type="checkbox"/> No <input type="checkbox"/>	All Project Information boxes are complete and correct: Project Name, ADOT Project Number, Federal-aid Number, CE Start Date, Estimated Construction Cost, Programming/Fiscal Constraint, Construction Administration and FMIS Designation
Location and Limits	
Yes <input type="checkbox"/> No <input type="checkbox"/>	Route and MP Limits provided (or LPA project location)?
Yes <input type="checkbox"/> No <input type="checkbox"/>	City and County?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Existing land ownership of facility provided (ADOT ROW, underlying land management agency or tribal lands for easements or LPA ROW)? n/a for certain (c)(1) CEs.
Purpose and Description	
Yes <input type="checkbox"/> No <input type="checkbox"/>	Complete Scope of work listed in Bullet Format, and consistent with Stage project plans current in review and technical reports?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	New ROW or permanent easements and/or temporary construction easements (TCEs) information provided?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Description of known substantial detours or new temporary access roads?
Type of CE	
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	(c)(1) CE Box Checked, if Appropriate? If "Yes" then the remainder of the CE QC Checklist can be bypassed and the form approved.
Yes <input type="checkbox"/> No <input type="checkbox"/>	CE type selected is appropriate (more than one type of CE may apply)
Environmental Review Section [excluding (c)(1) CE]	
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Air Quality Determination selected based upon Exempt project, Technical Specialist email or report in file as applicable?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Noise Determination selected based upon Exempt project, Technical Specialist email or report in file as applicable? n/a for Geotechnical.
Yes <input type="checkbox"/> No <input type="checkbox"/>	Biological Resources ESA Determination selected based upon Technical Specialist email or report in file as applicable?
Yes <input type="checkbox"/> No <input type="checkbox"/>	Cultural Resources Section 106 Determination selected based upon Technical Specialist email or report in file?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Is there documentation in the file for any determination other than "n/a - no Section 4(f) properties"?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Section 404 Clean Water Act Determination selected based upon Technical Specialist email or report in file as applicable?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	401 Clean Water Act Determination selected based upon Technical Specialist email or report in file as applicable?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Hazardous Material Determination selected based upon Technical Specialist email or report in file as applicable?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Environmental Justice/Title VI Determination selected is appropriate?
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Public Involvement for the project has been conducted consistent with 23 CFR 771.111?

Environmental Review Section [Continued]	
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	If Other Considerations are included ensure the appropriate documentation is in the file. For example if the project impacts adjacent farmlands an NRCS overview of farmland should be in the file.
Constraints under 23 CFR 771.117(e)	
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Are all constraints checked? These are only required for the following CE types: (c)(26), (c)(27), (c)(28).
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	Is additional information provided for any "Yes" constraint checked?
NEPA Certification and Determination	
Yes <input type="checkbox"/> No <input type="checkbox"/>	The project meets the definition of a CE under 23 CFR 771.117(a) and (b) and the correct authorizing MOU is selected?
Environmental Commitments	
Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>	ENV Commitments are included with the project and any permits and flyers are attached?
ENV-Drive Folder Review	
Yes <input type="checkbox"/> No <input type="checkbox"/>	All applicable template folders are in the Project File?
Yes <input type="checkbox"/> No <input type="checkbox"/>	All applicable Tech Reports in the Project File?
Yes <input type="checkbox"/> No <input type="checkbox"/>	All the Tech Review comment emails have been saved to the "Review Comments" folder?
Reviewer Comments	

<p>_____</p> <p>CE Reviewer: Click here to enter text.</p>	<p>_____</p> <p>Date:</p>
--	---------------------------

Individual CE Quality Control Form

Project Information:	
Project Name: Route or Location: Environmental Planner:	ADOT Project Number: Federal-Aid Number:

This form is to be completed for CEs prepared for projects that are individually documented and approved under 23 CFR 771.117(d) and approved pursuant to 23 USC 327 and the 327 MOU executed by ADOT and FHWA.

Certification:

This CE complies with ADOT Environmental Planning guidance and the requirements of all applicable federal laws, regulations and Executive Orders. I acknowledge the appropriate quality controls have been approved and signed. The CE is ready for signature.	
<input type="checkbox"/>	ADOT District and Project Manager have been sent a copy of the Environmental Commitments for review
<input type="checkbox"/>	A completed CE QC Checklist is located in the Project File
<input type="checkbox"/>	The ADOT Civil Rights Office received a copy of the CE Checklist
<input type="checkbox"/>	The CE is logged in the MOU Tracking and Reporting spreadsheet
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> <hr style="width: 30%; border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> NEPA Assignment Manager: </div> <div> <hr style="width: 30%; border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Date: </div> </div> <p>Click here to enter text.</p>	

Project Information:			
Project Name:		<input type="checkbox"/> Federal Assigned	<input type="checkbox"/> Federal Not Assigned (FHWA)
TRACS No:		Federal-aid No:	QC Review Begin Date :
District:	Project Sponsor:		

32

		When reviewing project files for environmentally relevant document information, confirm topic files do exist electronically and the file contents contain complete public records supporting the decisions within the Technical Area Content Review checkboxes reviewed below.		
Planner to conduct QC review of content if present : Yes No		Technical Area Content Review- Affected Environment / Impacts / Avoidance, Minimization and Mitigation Measures		
		Included in this Document	Not required for this Document	<i>Verify investigation outcomes and project effects are appropriate for each topic. Verify applicable avoidance, minimization, mitigation measures, and commitments for each review topic.</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Right of way/Displacements
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Land Use (Consistent with current STIP/TIP, RTP, or MTP)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Farmlands
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Community Impacts, LEP, ROW/Displacements, community facilities, community cohesion, public health and safety
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Environmental Justice
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Utilities/Emergency Services
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Traffic and Transportation/Pedestrian and Bicycle Facilities
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Visual/Aesthetics
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Economics
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Historic Resources
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Archeological Resources
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water Quality
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Floodplain
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous Materials
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Joint Development (If applicable)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FHWA air quality conformity determination (place in appendix)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Noise Requirements
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ecosystems (Wetlands, Wildlife, T&E Species, Natural Communities)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Construction Impacts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mitigation Summary
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Indirect Impacts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cumulative Impacts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Section 4(f) – If applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Section 6(f) – If applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FHWA Constructive Use Determination
Attach comments as needed. Identify comment by section or paragraph number when reviewing, e.g. Section XX.yy comment.....; Section YY.zz comment.....				
Draft EA Checklist Approval				
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> Checklist Approver: Click here to enter text. </div> <div> Date: </div> </div>				

EA Quality Control Form

Project Information:	
Project Name: ADOT Project Number: Federal-Aid Number: Estimated Project Construction Cost: NEPA Start Date: Click here to enter a date.	Construction Project Administration ADOT <input type="checkbox"/> CA Agency <input type="checkbox"/> Planning Requirements: <input type="checkbox"/> Fiscal Constraint/Design Concept and Scope

Draft Environmental Document Approval:

I have reviewed this Draft EA and find that it complies with ADOT Environmental Planning guidance and the requirements of all applicable federal laws, regulations and Executive Orders	
<input type="checkbox"/>	The consultant has submitted a quality control certification
<input type="checkbox"/>	The required Technical Section(s) review has been completed
<input type="checkbox"/>	An EA Quality Control Checklist has been completed and the environmental document meets all ADOT requirements
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> Environmental Planner: Click here to enter text. </div> <div> Date: </div> </div>	
I have reviewed this Draft EA and find that it complies with ADOT Environmental Planning guidance and meets all ADOT requirements	
<input type="checkbox"/>	The completed quality control reviews are located in the Project File
<input type="checkbox"/>	Legal counsel has reviewed the draft environmental document (optional)
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> NEPA Assignment Manager: Click here to enter text. </div> <div> Date: </div> </div>	

Final Environmental Document Approval:

I have reviewed this Final EA and FONSI and find that it complies with ADOT Environmental Planning guidance and the requirements of all applicable federal laws, regulations and Executive Orders	
<input type="checkbox"/>	The consultant has submitted a quality control certification
<input type="checkbox"/>	All Project Team comments have been adequately addressed and incorporated in the final environmental document
<input type="checkbox"/>	All substantive public and agency comments have been adequately addressed and responses incorporated in the final environmental document
<input type="checkbox"/>	Any necessary technical report updates have been completed and are located in the project file
<input type="checkbox"/>	A legal sufficiency review has been completed if an individual Section 4(f) evaluation was completed as part of the EA (if applicable)
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%;"> <p>Environmental Planner:</p> <p>Click here to enter text.</p> </div> <div style="width: 45%;"> <p>Date:</p> </div> </div>	

FONSI for Approval:

I have reviewed this Final EA and FONSI and find that it complies with ADOT Environmental Planning guidance and all ADOT requirements	
<input type="checkbox"/>	The completed quality control reviews are located in the Project File
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%;"> <p>NEPA Assignment Manager:</p> <p>Click here to enter text.</p> </div> <div style="width: 45%;"> <p>Date:</p> </div> </div>	

EIS Quality Control Checklist

Project Information:			
Project Name:		<input type="checkbox"/> Federal Assigned	<input type="checkbox"/> Federal Not Assigned (FHWA)
TRACS No:		Federal-aid No:	QC Review Begin Date :
District:	Project Sponsor:		

Planner to conduct QC review of content if present :			Major Required Content
Yes	No	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cover Page and Table of Contents
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Follows Cover Page and Table of Contents format in ADOT EA/ EIS Guidance Manual Appendix A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Project Title, full TRACS Number, full federal-aid project number, route, and termini
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Signature block, document statement, and contacts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	23 U.S.C. 327 MOU assignment language is on cover page of the EIS
Planner to conduct QC review of content if present :			EIS Specific Review Section
Yes	No	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EIS ROD
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Follows document type format in ADOT EA/EIS Guidance Manual Appendix A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Decision
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Alternatives considered; selection of the Preferred Alternative is noted and discussed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FHWA Transportation Conformity Finding is present-when applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EIS Executive Summary
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Introduction
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Purpose and Need Statement Paragraph
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Alternatives Considered Paragraph Summary
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Affected Environment, Environmental Consequences, and Mitigation Measures Summary
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Public and Agency Coordination
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cooperating Agency Evaluation Summary
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Table of Contents: include list of tables, figures, appendices, and List of Acronyms
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proposed Project
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Introduction: Brief introduction including suitable figures
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Existing Facility or Project Description
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Logical termini and independent utility description discussion
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Includes location, length, type of improvements, and any ROW / Easements needed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Purpose and Need
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Purpose and Need Statements
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Planning and Programming Status
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Project is Consistent with Arizona Regional Transportation Plan, State Transportation Plan, Transportation Plan, and is in ADOT Five Year Construction Program (required for final environmental document)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Alternatives
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Discussion of Project build alternative(s)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Estimated Project Cost Information

Planner to conduct QC review of content if present :			Major Required Content
Yes	No	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Project No-build Alternative
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification of Preferred Project Alternative for Final Environmental Document
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Locally Preferred Project Alternative should one have been identified
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Project Alternatives Considered But Eliminated From Further Consideration
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cover Page and Table of Contents
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Avoidance, Minimization and/or Mitigation Measures
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Comments and Coordination (Public Involvement and Agency Coordination)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Permits and Approvals Needed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Commitments (table recommended)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	List of Preparers-EIS only
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Distribution List-EIS only
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	References Cited

			When reviewing project files for environmentally relevant document information, confirm topic files do exist electronically and the file contents contain complete public records supporting the decisions within the Technical Area Content Review checkboxes reviewed below.		
Planner to conduct QC review of content if present :			Technical Area Content Review-		
			Affected Environment / Impacts / Avoidance, Minimization and Mitigation Measures		
Yes	No	N/A	Included in this Document	Not required for this Document	Verify investigation outcomes and project effects are appropriate for each topic. Verify applicable avoidance, minimization, mitigation measures, and commitments for each review topic.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Right of way/Displacements
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Land Use
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Consistent with current STIP/TIP, RTP, or MTP
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Farmlands
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Community Impacts, LEP, ROW/Displacements, community facilities, community cohesion, public health and safety
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Environmental Justice
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Utilities/Emergency Services
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Traffic and Transportation/Pedestrian and Bicycle Facilities
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Visual/Aesthetics
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Economics
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Historic Resources
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Archeological Resources
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water Quality
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Floodplain
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous Materials
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Joint Development (If applicable)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FHWA air quality conformity determination (place in appendix)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Noise
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ecosystems (Wetlands, Wildlife, T&E Species, Natural Communities)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Relationship between local short-term uses of the maintenance of the human environment and the maintenance and enhancement of the long term productivity

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Any Irreversible and irretreivable commitments or resources which would be involved in the proposed action
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Construction Impacts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mitigation Summary
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Indirect Impacts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cumulative Impacts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Section 4(f) – If applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Section 6(f) – If applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FHWA Constructive Use Determination
<p>Attach comments as needed. Identify comment by section or paragraph number when reviewing, e.g. Section XX.yy comment.....; Section YY.zz comment.....</p>					
<p>Draft EIS Checklist Approval</p>					
<div style="display: flex; justify-content: space-between; align-items: flex-start; height: 100px;"> <div style="width: 45%;"> <p>_____</p> <p>Checklist Approver:</p> <p>Click here to enter text.</p> </div> <div style="width: 45%;"> <p>_____</p> <p>Date:</p> </div> </div>					

EIS Quality Control Form

Project Information:	
Project Name: ADOT Project Number: Federal-Aid Number: Estimated Project Construction Cost: NEPA Start Date: Click here to enter a date.	Construction Project Administration ADOT <input type="checkbox"/> CA Agency <input type="checkbox"/> Planning Requirements: <input type="checkbox"/> Fiscal Constraint/Design Concept and Scope

Draft Environmental Document Approval:

I have reviewed this Draft EIS and find that it complies with ADOT Environmental Planning guidance and the requirements of all applicable federal laws, regulations and Executive Orders	
<input type="checkbox"/>	The consultant has submitted a quality control certification
<input type="checkbox"/>	An EIS Quality Control Checklist has been completed and the environmental document meets all ADOT requirements
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> _____ Environmental Planner: Click here to enter text. </div> <div> _____ Date: </div> </div>	
I have reviewed this Draft EIS and find that it complies with ADOT Environmental Planning guidance and meets all ADOT requirements	
<input type="checkbox"/>	The completed quality control reviews are located in the Project File
<input type="checkbox"/>	The Arizona Attorney General's Office has reviewed the Draft EIS (ADOT requirement)
I acknowledge the Draft EIS is ready for signature and agency and public review	
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> _____ NEPA Assignment Manager: Click here to enter text. </div> <div> _____ Date: </div> </div>	

Final Environmental Document Approval:

I have reviewed this Final EIS and ROD and find that it complies with ADOT Environmental Planning guidance and the requirements of all applicable federal laws, regulations and Executive Orders.	
<input type="checkbox"/>	The consultant has submitted a quality control certification
<input type="checkbox"/>	All Project Team comments have been adequately addressed and incorporated in the final environmental document
<input type="checkbox"/>	All substantive public and agency comments have been adequately addressed and responses incorporated in the final environmental document
<input type="checkbox"/>	Any necessary technical report updates have been completed and are located in the project file
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> <p>Environmental Planner:</p> <p>Click here to enter text.</p> </div> <div> <p>Date:</p> </div> </div>	
I have reviewed this Final EIS and ROD and find that it complies with ADOT Environmental Planning guidance and all ADOT requirements.	
<input type="checkbox"/>	The completed quality control reviews are located in the Project File
<input type="checkbox"/>	A Legal Sufficiency Review for the Final EIS and ROD has been completed and the AGO Legal Sufficiency determination is located in the Project File
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> <p>NEPA Assignment Manager:</p> <p>Click here to enter text.</p> </div> <div> <p>Date:</p> </div> </div>	

Amendments to QAQC Plan

Description of Modification

Version*	Change	Date	Responsible
V1	Start of 327 MOU	4/16/19	
V1a	327 MOU date added on page 4. Self-Assessment section modified page 7. Clarification added that the Wetland Biologist reviews cooperating agency letters sent to the Corps and the Biologist reviews cooperating agency letters sent to the USFWS (pg. 15). EA and EIS QC Checklists modified. Reference to EJ Checklist deleted from CE QC Form. Note added to QA Forms for final technical report updates.	01/21/20	PAO

Note*: version stays the same for minor changes with sub-version letter added.