



Quality Control Review

QC – Problem Detection – Finding issues or problems prior to their delivery as accurate and complete. That is what we do when we peer-review each other’s documents or Jon/Jason reviews documents.

QA – Problem Prevention – Once problems are detected, QA procedures are put into place to prevent them from occurring again. Typically problems are identified in the QC process, and the QA process identifies procedures to avoid them in the future. Audits are conducted to be sure the problem-prevention procedures are being followed.

WHO DOES QC REVIEWS?

- All NEPA Staff (State or Embedded Employees) would perform QC Reviews, but not on their own documents.
- Only State Employee NEPA Staff would perform QC Reviews on Level 1 documents.
- Embedded Employees from the firms preparing the document cannot QC their own firm’s documents.
- The Environmental Documents Manager and the Environmental Section Manager would do a 2nd level QC Review on higher level documents (CE Level 2, 3, EA, EIS, Reevaluation).

INTERNAL NDOR-GENERATED DOCUMENT REVIEW PROCESS

- The NEPA Specialist completes CE Form with inputs from Design, Bridge, Technical Specialists and creates a QC Copy for use in the review, labeled: Control Number_Project Name_Date_QC Review Copy.
- The NEPA Specialist then fills out the top part of the QC Form (Attachment 1) and gives it to the QC Reviewer along with the QC copy of the draft document to be reviewed.
- The QC Reviewer uses the *Environmental Document QC Review Actions* list (Attachment 2) to guide their review. (A Checklist is being prepared specifically for use in QC reviews of the new CE Forms.) All QC Review comments are documented on the electronic QC copy of the draft NEPA document.
- The QC Reviewer completes the review, signs the QC form and returns it to the NEPA Specialist for comment resolution.
- The draft NEPA document is returned to the QC Reviewer after comments are resolved in the electronic QC copy of the NEPA document, for the Reviewer to determine if resolution is

complete. If all comments are resolved, the QC Reviewer signs the QC Form, inputs the date when the QC Review is complete and returns it to the NEPA Specialist.

- The NEPA Specialist then completes the Division Routing Slip (Attachment 3) and circulates the draft NEPA document to Roadway Design, Bridge (if applicable), and Construction Divisions for their review and comment. Any comments received would then be incorporated into the draft NEPA document. If comments are substantial the draft NEPA document should be recirculated to the QC Reviewer to consider the changes.
- Once the QC Review is complete, the NEPA Specialist then signs the QC Form on the bottom where it says “NEPA Specialist Signature” and the draft NEPA document is ready for creating a clean copy for approval(s). **THE QC COPY MUST BE SAVED WITH COMMENTS AND RESPONSES INTACT.**
- The signed QC Form, the QC copy of the draft NEPA document with comments and resolutions, and the Division distribution slip or emails containing comments or signatures that the Divisions reviewed the document, are then to be filed in the Project’s QC File.
- TO BE DONE WHEN CLARITY QC PAGE IS BUILT: Update Clarity with QC Review information. (Ryan and Cindy are working with Mike Beattie on how to transfer and track comments.) There will be a Clarity activity and page for QC. Input of comments by both internal review and FHWA review will be required along with input of Date QC Completed. These inputs will be key and critical for auditing purposes.

EXTERNAL: CONSULTANT-GENERATED DOCUMENTS (Similar to Internal procedures with a few key differences)

- The Draft NEPA Document is received from the Consultant, along with verification that the Company’s internal QC review process has been followed.
- The NEPA Specialist reviews the document for completeness.
- The NEPA Specialist creates a QC Copy for use in the review, labeled: Control Number_Project Name_Date_QC Review Copy.
- The NEPA Specialist then fills out the top part of the QC Form (Attachment 1) and gives it to the QC Reviewer along with the QC copy of the document to be reviewed.
- The QC Reviewer uses the *Environmental Document QC Review Actions* list (Attachment 2) to guide their review. (A Checklist is being prepared specifically for use in QC reviews of the new CE

Forms.) All QC Review comments are documented on the electronic QC copy of the draft NEPA document.

- The QC Reviewer completes the review, signs the QC form and returns it to the NEPA Specialist for comment resolution.
- Specialist reviews comments and determines if they can be resolved in-house or needs to be returned to the Consultant for comment response. Return to Consultant for resolution if needed.
- The NEPA Document is returned to QC Reviewer after comments are resolved by the consultant and the Reviewer determines if resolution is complete. If all comments are resolved, the QC Reviewer signs the QC Form and inputs the date when the QC Review is complete.
- The NEPA Specialist then signs the QC Form on the bottom where it says “NEPA Specialist Signature” and the document is ready for approval or circulation to management.
- The QC Form and the QC copy of the NEPA document with comments and resolutions are then to be filed in the Project’s QC File.
- TO BE DONE WHEN CLARITY QC PAGE IS BUILT: Update Clarity with QC Review information. Ryan and Cindy are working with Beattie on how to transfer and track comments. There will be a Clarity activity and page for QC. Input of comments by both internal review and FHWA review will be required along with input of Date QC Completed. These inputs will be key and critical for auditing purposes.

Quality Assurance Review

Quality Assurance (QA) is about problem PREVENTION (developing proactive processes).

- QC comments shall be collected in a common database, (a QA/QC page is being developed in Clarity) for analysis of each block’s comments by internal QC reviewers and also by FHWA reviews.
- An NDOR QA Audit Team will be formed, consisting of 3 individuals not involved in NEPA document preparation and Project Management (likely Barber, Jurgens and one from outside the Environmental Section).
- FHWA and NDOR will audit randomly-selected projects and meet to discuss results. These activities would be conducted initially every 3 months, with a goal to reduce frequency to annually over time, based upon positive results.

- The NDOR Audit Team may also conduct audits, independent of participation by FHWA, to verify successful implementation of the QC process.
- The NDOR QA Audit Team would provide feedback to the NEPA Specialists and staff regarding areas of strength and weakness, along with corrective actions for problem areas.
- NDOR Environmental Technical Specialists will develop Memo templates for consistency of resource reviews and decision documentation. Technical specialties include such subjects as: Hazardous Materials, Threatened and Endangered Species, Noise, Air Quality, Environmental Justice, and Section 106.



ENVIRONMENTAL DOCUMENT QC REVIEW FORM

(To Be Completed By the NEPA Specialist)

Date QC Review is Initiated: _____

Project Name: _____

Control Number: _____ Project Number: _____

NEPA Specialist: _____

QC Review Due Date: _____

(To Be Completed by the QC Reviewer)

Review Method:

_____ Redline Hard Copy _____ Track Changes on Electronic Document

_____ Comments on Log Sheet _____ Other

QC Reviewer Signature (Initial Review):

_____ Date: _____

QC Reviewer Signature (Final Review - Acknowledgement of Satisfactory Comment Resolutions):

_____ Date: _____

(To Be Completed By The NEPA Analyst and EDU Manager – as appropriate)

NDOR NEPA Specialist's Signature (QC Review is Complete – Document Ready For Approval):

_____ Date: _____

EDU Manager Signature - If CE Level 2, 3, EA, EIS, Reevaluation (Initial Review):

_____ Date: _____

EDU Manager Signature (Final Review - Acknowledgement of Satisfactory Comment Resolutions):

_____ Date: _____

Environmental Document Quality Control (QC) Reviewer Actions

Interim QC Guidance, May 27, 2015

The following actions are provided as guidance for use in Quality Control Reviews of NEPA documents. The list is intended to guide the reviewer in the QC Review activity, but is not all-inclusive. QC Checklists will be prepared to further assist in the QC review process and will replace the following list when available.

- I. Compare the environmental document's Project Description to the most current one on Falcon, as well as to the Project's Activity Checklist, to be sure it is current and complete. Check Project Start and End points for consistency with those in the Project file and Scoping Document.
- II. Is the Environmental Study Area explained well enough and mapped such that someone 5 years from now with no prior Project experience could re-evaluate what was considered in the original document and determine if there are any design changes or new ROW needs?
- III. Review Scoping Documents for project details and compare to information used in the environmental document.
- IV. Review Purpose and Need Statement for clear problem statement of need with supporting data/discussion (be sure the problem's solution is not discussed in the Statement). Is Project Termini justified?
- V. Review all attachments for the following:
 - a. Current Project Description was used for each environmental resource review. If the Project Description changed during the course of development, check that the attachment contains either an agency review update or an NDOR Resource Specialist memo documenting why an agency review update is not needed.
 - b. Attachments are in the appropriate order that they are discussed in the document.
 - c. Attachment Figures (NDOR TEMPLATE TO BE DEVELOPED):
 1. Do not contain a consultant's logo or project number;

ATTACHMENT 2

2. Have the appropriate NDOR Project Name, Project Number and Control Number;
 3. Have a North arrow, scale, and legend with appropriate identifying features (i.e.; landmarks – airports, railroads, major highways or streets), as well as consistently mapped features (size of environmental study area, Project start and end points – use decimals not +/- symbol, alignment color, etc.);
 4. Figure numbers and Title;
 5. Figure format is consistent - location of title, legend, Figure number, scale and north arrow;
 6. Be sure that items directly discussed in the document (specific streets names, schools, businesses, etc.) are shown on the appropriate Figure.
- d. Each individual Resource Attachment should be checked for:
1. Its age (*generally* Hazmat should be less than 1 year old, T&E less than 2 years old, Wetlands delineation less than 5 years old, and Historic Section 106 review less than 5 years old.) If the Attachment's age is greater than the general guidelines, check with the Technical Resource Specialist to gauge whether or not an update is needed.
 2. Resource issue definition and issue resolution (including concurrence signatures by appropriate resource agency representatives);
 3. Commitments, and consistency with their discussion in the body of the environmental document and the Commitments section;
 4. That concurrence dates and other important dates from the Attachments are consistent with those in the environmental document.

VI. Environmental Document Review

- a. Level 1,2,3 Categorical Exclusions
 1. *CHECKLIST TO BE DEVELOPED BASED ON NEW CE GUIDANCE*
- b. Environmental Assessment
 1. Previously, an EA Checklist was developed for document review (Attached) – However, this checklist is in need of update to incorporate current FHWA EA practices, procedures, structure and content.
- c. Environmental Impact Statement

Previously, an EIS Checklist was developed for document reviews (Attached) – This checklist is also in need of updating.

- VII. Project Mitigations and Commitments
 - a. Mitigations and Commitments should be listed in the order that they are discussed in the document.
 - b. Commitment language should match that in the document – except ‘would’ becomes ‘shall’ and responsible parties are included in parentheses at the end of the commitment.



Routing Slip – Division Environmental Document Review

Project Name: _____ Control Number: _____

Return to NEPA Specialist: _____ in Environmental Documents Unit

The following responsible Division representatives have reviewed the Environmental Document and project plans to assure that:

- The referenced project's description is accurately represented;
- Environmental impacts are properly considered;
- Environmental mitigations / commitments are included in project plans and specifications; and
- The mitigations / commitments are viable for bidding and project constructability.

Roadway Design Division

Roadway Designer: _____ Date: _____

Bridge Division (If Applicable)

Bridge Designer: _____ Date: _____

Construction Division

PS&E Reviewer: _____ Date: _____

Comments (Reference page in the document where comment is made; note which Division made the comment – i.e.; See page 12, RD, BD, or CD):