

# Memorandum

To: DISTRICT DEPUTY DIRECTORS,  
ENVIRONMENTAL

Date: July 11, 2002

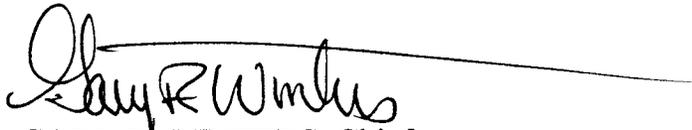
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From: **DEPARTMENT OF TRANSPORTATION**  
**DIVISION OF ENVIRONMENTAL ANALYSIS - MS27**

Subject: District Environmental Document Quality Control Plans

District Environmental Document Quality Control Plan (EDQCP) submitted in response to my memorandum of November 29, 2002 have been reviewed. Our instructions in that memo were intentionally flexible to encourage the districts to tailor their plans to their particular organizational structure. Unfortunately, this approach resulted in the creation of plans that did not contain the specificity expected. To reach a higher degree of specificity in the plans, the Environmental Management Board (EMB) identified basic plan elements and additional instruction during the April direction for improving the original district QC plans (attached).

New revised District/Region EDQC plans, based on concepts agreed to by the EMB, are to be submitted to the Division prior to August 15, 2002 with a copy to your assigned DEA Coordinator. Please contact me at (916) 653-7136, or Denise O'Connor, Chief, Environmental Management Office at (916) 653-5157.



GARY R. WINTERS, Chief  
Division of Environmental Analysis

Attachment

## ATTACHMENT

The original instructions indicated five required reviews would form the basis for EDQC plans. Upon review of the submitted plans, it became apparent that the sequence of the required reviews was inconsistent and some plans lacked a logical approach. EMB group discussions indicated the reviews should occur in the following order: (1) Technical Specialist review, (2) Internal Peer Review, (3) Technical Editing Review, (4) Legal Review, and (5) Supervisor Review. The Board recognized that performance of these reviews is not a substitute for close coordination between members of the environmental interdisciplinary team, including legal, during the environmental scoping and evaluative phases of document preparation. In order to convey a District's QC process to users of the plan, a process flowchart shall be included in revised plans. Additionally, breakout group discussions indicated Districts should consider applying QC measures to technical reports which support environmental documents.

Most plans lacked an element to manage the comments generated from the QC reviews. The EMB discussed the management and disposition of comments resulting from the required reviews and mechanisms by which the comments could be used to add value to the QC process. Tracking of internal comments is an essential element of any QC plan and necessary in ensuring its effectiveness. Several districts employ various types of software, for example, the Central Region uses Filemaker, to capture comments and track their disposition. Each plan must provide instructions as to how comments are to be documented and managed. All comments must be addressed in some way. Plans should consider such things as retention period for comments, how to handle recurrent comments, passing of comments to the next level of review, etc.

In addition, written verification must accompany the environmental document transmittal to DEA and FHWA to certify that the required reviews have taken place. Each QC plan must include written documentation that each required review has taken place. Written documentation may be in the form of a sign-off sheet that follows the sequence of reviews.

The EMB also discussed the need for the plans to include a dispute resolution as it relates to problematical situations between technical specialists and environmental document writers or other reviewers. Subsequent discussions brought out the need for a method of resolving incongruities between the writer(s) of the document and the comments of reviewers. Each plan should contain a procedure for resolving conflicts between all persons involved in ensuring the quality of environmental documents. Elevation of disagreements regarding disposition of comments is an important aspect of conflict resolution and it is recommended that a conflict resolution ladder be included in district plans.

In addition, the EMB discussed the benefit of forming an Environmental Document Team (EDT), following the North Region model. The purpose of the EDT would be to bring together decision makers to resolve any outstanding issues prior to a document's transmittal to DEA and FHWA.

The Board also suggested that required reviews should be performed for all versions of environmental documents i.e., draft and final and all levels i.e., Initial Studies/Environmental Assessments and Environmental Impact Statements/ Environmental Impact Reports. For the purpose of clarification, only EIS level documents are subject to review by DEA Coordinators. District may request DEA coordinator review of other document types.

In a breakout group setting, the five required reviews were discussed and as a result the following expectations were identified. These expectations form the basic requirements that must be included in each District's OC plan:

#### **Technical Review –**

- This review shall focus on the accuracy of technical data presented in the environmental document.
- Specialists who were responsible for the technical studies performed for the project shall carry out this review.
- Recommended period for performance of this review is one to two weeks

#### **Peer Review**

- Reviewer must be Associate level or above
- Reviewer should be drawn from another unit or district
- Review should represent an independent (and complete) appraisal of the document
- Reviewers shall use existing checklists (FHWA Checklists for Draft and Final documents, CEQA Initial Checklist, and any available local checklists identifying issues of concern).
- Recommended period for performance of this review is one to two weeks (the complexity of the document can warrant flexibility).

#### **Technical Editor Review**

- Reviewer should be research writer (or consultant equivalent)
- Reviewer shall serve as Quality Control Coordinator to track reviews
- Review should focus on grammar, syntax, style, format, and graphics, etc.
- The recommended period for performance of this review is two to four weeks

### **Legal Review**

- Assigned attorney should be involved in all aspects of environmental process commencing with PID phase.
- Review of environmental document shall concentrate on Legal adequacy and completeness.
- Legal review comments are subject to Attorney/Client Privilege and must be labeled as such.
- Recommended period for performance of this review is one to 2 weeks.

### **Supervisor Review**

- Review shall be performed by the supervisor (or another supervisor familiar with the project) of the primary author of document
- Review shall ensure QA standards are met and consistency with requirements.
- Review shall confirm completion of other required reviews and ensure that written verification is available for transmittal with the subject document for review by the Division of Environmental Analysis and Federal Highway Administration.
- Recommended period for performance of this review is two to four weeks.