

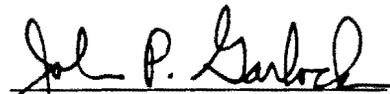


**Office of Local Programs
Procedures Development Office**

**Environmental Documents
Process Review 98-05**

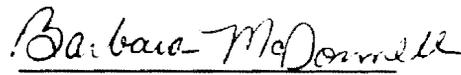
FINAL REPORT

Recommended Approval:



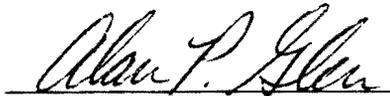
Office Chief, Procedures
Development Branch

Approved:



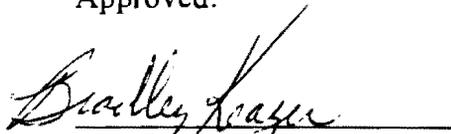
for Program Manager
Environmental Program

Approved:



Assistant Program Manager
Design and Local Programs

Approved:



FHWA, Assistant Division
Administrator

Date: October 19, 1998

EXECUTIVE SUMMARY

This report presents the findings and recommendations of a quality improvement team. The mission of the team was to improve the quality of environmental documents prepared by local agencies. For the purpose of this effort, the team defined a quality environmental document as complete, sufficient, clear, understandable, accurate, in compliance with pertinent laws and regulations, and unbiased. This would constitute an adequate document that is acceptable to all reviewing agencies.

The team's findings revealed that the majority of local agencies' environmental documents exhibited poor quality. The lack of quality is the main contributor to delays in the environmental process which sometimes result in programming amendments or project scope changes. The following summarizes the key findings and recommendations in order of importance.

Finding 1:

Lack of consistent 'minimum standards' review within Caltrans

Recommendation 1:

Develop one minimum standard reference to be used in the preparation and review of technical reports.

Finding 2:

Caltrans projects are given higher priority and are reviewed on a shorter timeline than local projects.

Recommendation 2:

Implement policy to deliver local assistance projects in a timely way.

Finding 3:

Lack of understanding of guidance, processes, and procedures has resulted in poor quality consultant products.

Recommendation 3:

Expand and improve existing training for local agencies and consultants.

Finding 4:

Local agencies want to avoid duplication of environmental effort. Local agencies do not want to have to complete a PSR equivalent for SB 45 projects, then have to complete a Preliminary Environmental Study (PES) form and Field Review Form.

Recommendation 4:

Explore better coordination between programming document requirements (PSR) for SB 45 projects and the Preliminary Environmental Study (PES) form.

On October 1, 1998, Caltrans and FHWA entered into a Partnering Agreement to facilitate an enhanced and more efficient decision-making process and identification and prioritization of joint environmentally-related goals. It was jointly agreed that the recommendations of this report would be the first implemented issues for that model.

A. BACKGROUND

In recent years, Caltrans, Office of Local Programs (OLP), has been in the process of streamlining many of its policies and procedures. Reengineering of local assistance procedures in 1995 accomplished most of the streamlining; other refinements have since been implemented. During OLP's development of the *Local Assistance Procedures Manual*, the Federal Highway Administration (FHWA) provided review comments which covered a broad range of procedural requirements. FHWA's review comments on the environmental procedures prompted much discussion, and consequently led to OLP's commitment to improving the quality of environmental documents prepared and submitted by the local agencies.

As part of this commitment, OLP hired a management consulting firm, Moore Iacofano Goltsman, Inc., (MIG), to provide facilitation services for a quality improvement team. From May 5 through September 21, 1998, MIG led this team using total quality management techniques. This team became known as the Environmental Documents Quality Improvement Team (EDQIT). The EDQIT was comprised of the following:

Team Members

- Randy Bardini Merced County, Public Works
- Andy Newsum Butte County, Public Works
- Ken Kochevar FHWA
- Steve Propst Caltrans, District 3 Local Assistance
- Gary Caldwell Caltrans, District 10 Local Assistance
- Virginia Denison Caltrans, District 3 Environmental
- Denise O'Connor Caltrans, Environmental Program
- Germaine Belanger Caltrans, OLP Environmental
- Rick Gifford Caltrans, OLP Process Reviews
- David Cordova Caltrans, OLP Policy Development

Team Facilitators

- Pat McLaughlin MIG
- Lou Hexter MIG

B. OBJECTIVE OF REVIEW

The objective of this review, or the mission of the EDQIT, is to improve the quality of local agencies' environmental documents that are submitted to Caltrans and FHWA. It is believed that the improved quality of environmental documents will result in documents that will be acceptable, in all aspects, to reviewing agencies; and consequently, will reduce the processing time. Improved quality will be accomplished through adopted recommendations from the EDQIT. These recommendations will be the basis to formulate procedures, processes, and products which will be explained thoroughly in revisions to Chapter 6 of the *Local Assistance Procedures Manual*, and in the upcoming *Local Assistance Environmental Manual*.

C. REVIEW APPROACH

The EDQIT used seven (7) different steps (Attachment 1) to arrive at our recommendations for improving the quality of local agency prepared environmental documents. For the purpose of this effort, the team focused on Categorical Exclusions and required technical reports (i.e., Section 4(f) Evaluations, Cultural Resource Reports for Section 106, Biological Reports for Section 7, Wetland Evaluations for E.O. 11990 and Floodplain Evaluations for E.O. 11988).

1. The first step was to examine the existing process, **brainstorm problem areas**, and **draft key questions**. EDQIT members considered how each step of the existing process could affect the "quality" of the environmental document and identified the following questions:
 - What guidance do local agencies and their consultants use when preparing environmental documents?
 - Have local agencies had an opportunity to follow the Local Assistance Procedures Manual dated February 1, 1998, and if so, do they feel that these procedures contributed to the preparation of a quality document?
 - Have local agencies attended the Institute of Transportation Studies (ITS) Environmental Analysis for Local Agency Transportation Projects training course, and if so, do they feel the training contributed to the preparation of a quality document?
 - Which environmental reviews are causing the problems?
 - What are the causes of the problems?
 - How long are the delays in the environmental review process?
 - What are your suggestions for improving the quality of environmental documents?
2. The second step was to **develop an informational survey** to obtain answers to the key questions. A hardcopy of the survey (Attachment 4) was sent to all local agency preparers that have entered into a master agreement with Caltrans. Responses were requested via the Internet from OLP's Home Page. This enabled us to build an electronic database, which was the Department's first foray into an on-line survey.
3. The third step was to develop a framework for **analysis of the survey results** by using the electronic database to do data comparisons. EDQIT members identified the following questions as a framework for analyzing the results of the survey:
 - Who is having the problem?
 - What problems are they having?
 - How often do these problems occur?
 - How important are these problems? What level of priority?
 - What impacts do training programs, manuals, consultants, etc., have on the amount of time required to get approval on environmental studies?

4. The fourth step was to develop a **second survey**, based on the responses received from the first survey, to determine what reviewers¹ of local agency documents perceived as the biggest problem relating to a quality document. Survey responses were solicited through **telephone interviews**.
5. The fifth step was to **analyze the information received and summarize common threads**--first, among the variety of agencies responding to both surveys and second, between responses received from first and second surveys. This led to a series of questions or key issues.
6. The sixth step was to **group and prioritize key issues** (Attachment 2). The EDQIT members identified three (3) key issues and one ancillary issue.
 - Develop one standard guidance for the preparation and review of technical reports.
 - Implement policy to deliver local assistance projects in a timely way.
 - Expand and improve existing training for local agencies and consultants.
 - Explore better coordination between programming document requirements (PSR) and Preliminary Environmental Study (PES).
7. The seventh step was to **brainstorm solutions**. The EDQIT members identified three (3) potential solutions (a detailed matrix is presented in Attachment 3) as follows.
 - Identify minimum legal requirements and develop standard guidance for the development and review of technical studies consistent with the minimum legal requirements.
 - Implement policy to deliver local assistance projects in a timely manner.
 - Develop training for consultants, local agencies, reviewing agencies (including Caltrans, FHWA and resource and regulatory agencies).

¹ Selected agency reviewers included: U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (ACOE), State Historic Preservation Officer (SHPO), Environmental Protection Agency (EPA), National Marine Fisheries Service (NMFS), Federal Highway Administration (FHWA), Caltrans district local assistance engineers (DLAEs), and Caltrans district environmental technical specialists.

D. FINDINGS, OBSERVATIONS AND RECOMMENDATIONS

FINDING 1

- Lack of consistent 'minimum standards' review within Caltrans
- Lack of early coordination
- Lack of concurrence among agencies regarding technical report findings
- Insufficient project descriptions

OBSERVATION 1

- Less than half of respondents said that they followed the procedures set forth in Local Assistance Procedures Manual, Chapter 6. However, of those, 80% felt that following those procedures contributed to a higher quality document.
- Resource agencies noted insufficient project descriptions as a recurring problem.
- Resource agencies noted that within their own agency, there was a lack of standard guidelines for reviewing technical reports.
- Local agencies noted that Caltrans' standards exceeded legal requirements.
- Reviewers and local agencies are not using the same resource material in evaluating and writing technical reports, respectively. This inconsistency is not only inter-agency, but also intra-agency.
- Source materials available for review are inconsistent across agencies (Caltrans, FHWA, Resource, and Regulatory Agencies).

RECOMMENDATION 1

Develop one 'minimum standard' reference to be used in the preparation and review of technical reports.

- Identify minimum requirements of Federal law.
- Obtain resource and regulatory agency review standards.
- Determine value added with each review (consultants, local agency, DLAE, District environmental, HQ environmental, FHWA, resource and regulatory agencies).
- Develop standards for project descriptions.
- Distinguish between formal and informal consultations and define local agencies' role in coordinating/informally consulting with resource and regulatory agencies.
- Identify clear separation between NEPA and CEQA guidelines and note that federally funded projects only require NEPA clearance.
- Conduct another survey next year that determines if the quality of documents has improved and measures whether the recommendations of this report have contributed to the improved quality.

FINDING 2

- Lengthy review time

OBSERVATION 2

- Caltrans projects are given higher priority and are reviewed on a shorter timeline than local projects.
- Environmental documents undergo multiple reviews due to poor quality.
- Non-responsive reviewer (perceived and actual regarding CT/FHWA/regulatory agencies).
- Backlog of projects due to workload.
- Survey indicated Caltrans and resource and regulatory agency reviewers were not receiving sufficient advanced notification regarding forthcoming reports.
- There is no statewide database to track local agency project. Some District Local Assistance Engineers (DLAEs) have their own system to track local agency projects.
- Several resource agencies were receptive to working directly with local agencies, during preliminary environmental studies, to confirm or negate the likely presence of a particular resource within the project area.

RECOMMENDATION 2

Implement policy to deliver local assistance projects in a timely way.

- Reaffirm Bob Buckley/Brian Smith memo of 2/23/98 on Local Assistance environmental procedures – send to District Directors.
- Explore options for developing a statewide database to track and monitor local assistance projects.
- Based on the information contained in the database, calculate workload requirements.
- Explore ways to notify reviewers that documents are being prepared. The review time could be shortened with the ability to anticipate delivery of documents.
- Monitor and report biannually to Bob Buckley and Brian Smith on workload and ability of resources to accomplish workload in a timely manner.
- Estimate and develop realistic timeline staff are expected to meet. Caltrans and FHWA consider quarterly reporting to announce average turnaround time by district to stimulate competition.
- Coordinate with FHWA to provide them with the database so that FHWA can monitor and provide input.
- Identify statutory timelines for review by resource and regulatory agencies.
- Conduct follow-up survey of local agencies to measure their perception of the success of Caltrans commitment to reduce review times.

FINDING 3

- Lack of training
- Insufficient quality of consultant products
- Lack of understanding of guidance, processes, and procedures

OBSERVATION 3

- Of the 45% of respondents that had attended the Environmental Analysis for Local Agency Transportation Projects training, provided by Caltrans, through the Institute of Transportation Studies (ITS) University of California at Berkeley, 86% indicated the training contributed to the preparation of a quality document.

RECOMMENDATION 3

Expand and improve existing training for local agencies and consultants.

- Seek approval from RTPAs of increased funding for Cooperative Training Assistance Program (CTAP).
- Increase the number of Environmental Analysis for Local Agency Transportation Projects courses provided each year.
- Provide training on the various technical studies.
- Create joint training programs with FHWA and resource and regulatory agencies.

FINDING 4

- Lack of early consideration of environmental factors when SB 45 projects are programmed.

OBSERVATION 4

- Local agencies want to avoid duplication of environmental effort. Local agencies do not want to have to complete a Project Study Report (PSR) equivalent for SB 45 projects, then have to complete a Preliminary Environmental Study (PES) form and Field Review Form.

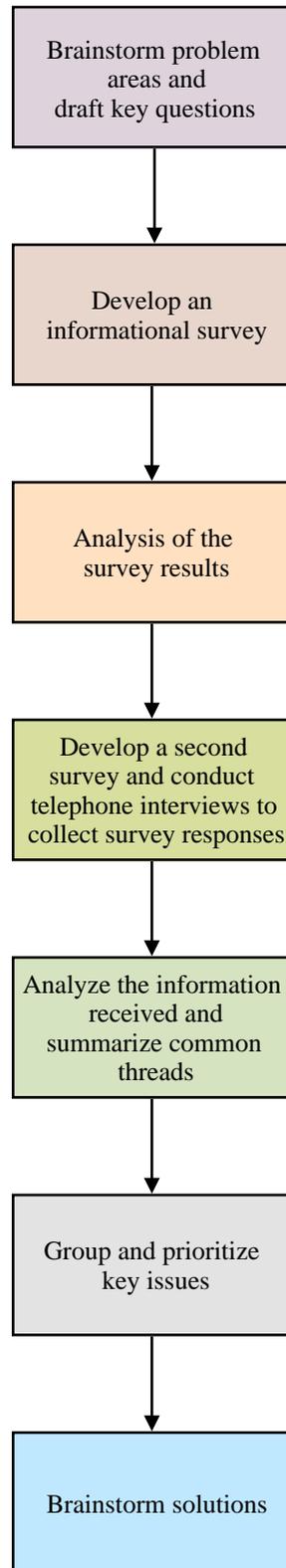
RECOMMENDATION 4

Explore better coordination between programming document requirements (PSR equivalent) for SB 45 projects and Preliminary Environmental Study (PES) form.

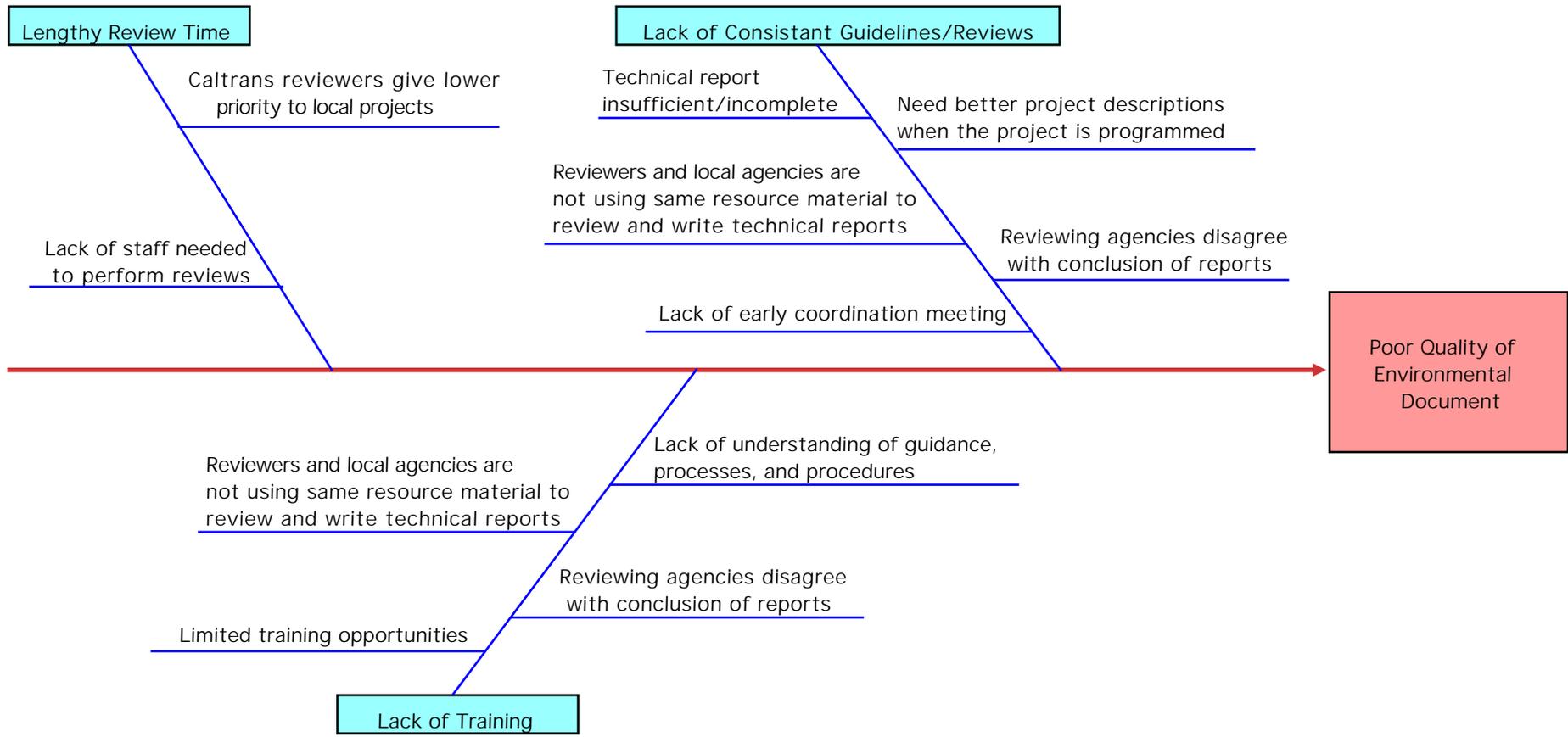
- Define PSR equivalent -- explore options for making PES and Field Review Form satisfy PSR equivalent.
- Coordinate with Planning Program.
- Explore funding for local agencies' preparation of a PSR equivalent document prior to projects' inclusion in a FSTIP.

Attachments (4)

EDQIT Decision Process -7 steps



Cause and Effect Diagram



EDQIT PRELIMINARY RECOMMENDATIONS

Attachment 3

	Issue	Potential Solution(s)	Key Action(s)	Lead	Timeframe
PAPER (Primary)	<p><i>LACK OF CONSISTENT 'MINIMUM STANDARDS' REVIEW WITHIN CALTRANS</i></p> <ul style="list-style-type: none"> • Lack of early coordination among agencies regarding technical report findings • Insufficient project descriptions 	<ul style="list-style-type: none"> • Develop one minimum standard reference to be used in the preparation and review of technical reports • Define agencies roles in early coordinating • Determine value added with each review • Develop standard for project descriptions 	<ul style="list-style-type: none"> • Make recommendation top priority of FHWA/CT Partnering Agreement Emphasis Area for Joint Goals • Identify minimum requirements of Federal law • Obtain resource and regulatory agency review standards • Form team to review and comment 	<p>Germaine Belanger & Denise O'Connor</p>	<p>January – February 1999</p>
PROCESS (Primary)	<p><i>LENGTHY REVIEW TIME</i></p> <ul style="list-style-type: none"> • Caltrans projects are given higher priority and are reviewed on a shorter timeline than local projects. • Environmental documents undergo multiple reviews due to poor quality • CT and resource agencies are not receiving sufficient advanced notification regarding forthcoming reports 	<ul style="list-style-type: none"> • Implement policy to deliver local assistance projects in a timely way • Explore options for developing a statewide database to track and monitor projects • Based on information contained in database, calculate workload requirement • Explore ways to notify reviewers that documents are being prepared • Monitor and report bi-annually • Estimate and develop realistic timelines review staff are expected to meet 	<ul style="list-style-type: none"> • Make recommendation top priority of FHWA/CT Partnering Agreement Emphasis Area for Joint Goals • Form team to explore options for developing database • Coordinate with Roxanne Cargill Local Programs Project Management, and consultant developing all programs database • Identify fields that would need to be tracked, and provide to consultant 	<p>Rick Gifford & Germaine Belanger</p>	<p>Consistent with consultants schedule to develop all-programs database</p>
PEOPLE (Secondary)	<p><i>LACK OF TRAINING</i></p> <ul style="list-style-type: none"> • Insufficient quality of consultant products • Lack of understanding of guidance, processes, procedures 	<ul style="list-style-type: none"> • Look to RTPAs for additional funding for Cooperative Training Assistance Program (CTAP) • Increase the number of ITS courses provided each year • Provide training on various technical studies • Create joint training with FHWA and resource and regulatory agencies 	<ul style="list-style-type: none"> • Secure funding for training program – look to RTPAs for additional funding • Identify funding sources and processes • Identify and develop potential training programs & techniques • Reciprocal agreements with resource agencies. • Coordinate with FHWA (Bob Tally) 	<p>Rick Gifford & Rich Weaver</p>	<p>RTPA Meeting October 1998</p> <p>May-June 1999 & ongoing</p>
PAPER (Ancillary)	<p><i>LACK OF EARLY COORDINATION ON SB45 PROJECTS</i></p>	<ul style="list-style-type: none"> • Require RTPAs to have for RTIP local agencies complete PES (PSR equivalent) 	<ul style="list-style-type: none"> • Ensure understanding of PSR equivalent • Communicate/hand-off to Planning Department • Explore funding for local agencies' PES for RTIP 	<p>Germaine Belanger & Rick Gifford</p>	<p>Consistent with partnering agreement priorities</p>

Caltrans Environmental Document Quality Improvement Team
Stakeholder Survey

This survey is intended to identify factors which may or may not influence the **quality** of technical reports (such as Section 4(f) Evaluations, Section 106 Cultural Resource Reports, Section 7 Biological Assessments, E.O. 11990 Wetland Reports, and E.O. 11988 Floodplain Reports) prepared by local agencies and/or their consultants, in support of **federal-aid** projects **off** the State highway system.

Note: Processing by Caltrans of the preliminary environmental studies (PES) necessary to determine the need for these technical reports was changed significantly with the reengineering of local assistance procedures in July 1995. As described in Attachment 2 of Local Program Procedures (LPP) 95-07, issued at that time, Field Reviews to review the PES were no longer required and assistance from Caltrans environmental specialists was virtually eliminated from this phase of the environmental process.

LPP 96-04 (and Chapter 6 of the new *Local Assistance Procedures Manual*) have provided better clarification of the PES procedures including instruction for preparing and processing other federal environmentally related process necessary to obtain Federal Highway Administration (FHWA) approval. However, detailed instructions for preparing and processing the various technical reports are contained in *Local Programs Manual Volume III*, and have not been changed. It is anticipated that the responses received from this survey will provide valuable information toward revising the *Local Programs Manual Volume III* and providing local agencies the tools they need to develop a “**quality**” environmental report that can be quickly processed and approved.

When completing the survey, please:

- * Consider only those projects that were undertaken within the last three years (or since July 1995).
- * Select a project that has given you the biggest problem.
- * Focus on the problem areas.

Caltrans Environmental Document Quality Improvement Team
Stakeholder Survey

1. Local Agency Name: _____
2. Caltrans District: _____
3. Name, Title, and Telephone Number of Person Completing Survey _____/_____/_____

Agency Population: < 50,000 50,000 – 200,000 > 200,000 NA
4. Specifically relating to projects processed under **Categorical Exclusion**, how many projects have you completed in the last three (3) years (or since June 1995), and how long has it taken from the identification of the Categorical Exclusion to approval?

of Categorical Exclusions, with
Technical Studies, Processed in

Last 3 Years

- 0
 1
 2 - 3
 4 - 10
 10+

Months to Complete

- < 3
 3 - 6
 7 - 12
 13 - 24
 > 24

5. How many technical reports have you completed in the last three (3) years (or since June 1995)?

<u># Completed</u>	<u>Section 4(f)</u>	<u>Cultural Resources</u>	<u>Wetlands</u>	<u>Biological</u>	<u>Floodplain</u>
0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 - 3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4 - 10	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10+	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| 6. Do you prepare technical reports in-house? | ___ | ___ |
| 7. Do you use an on-call consultant? | ___ | ___ |
| 8. Do you have a copy of LPP 95-07, Attachment 2; Environmental Procedures, June 20, 1995? | ___ | ___ |
| 9. Do you have a copy of LPP 96-04, Chapter 6, Preliminary Environmental Studies/Programmatic Categorical Exclusion, August 15, 1996? | ___ | ___ |
| 10. Do you provide your consultant with a copy of LPP 96-04 and the <i>Local Programs Manual</i> , Volume III? | ___ | ___ |
| 11. Do you follow LPP 96-04 when preparing and processing Categorical Exclusions ? | ___ | ___ |
| 12. Do you follow LPM Volume III, when considering the format and content of required technical reports? | ___ | ___ |

13. If not, what guidance do you follow?
- Caltrans *Environmental Handbook*
 - Guidance for Consultants, Procedures for Completing the Natural Environmental Study and Related Biological Reports, April 1990*
 - Guidance for Consultants, Procedures for the Protection of Historic Properties Section 106 Process, August 1988*
 - Other
- | | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| 14. Do you obtain signatures on the PES form before commencing with technical studies? | --- | --- |
| 15. Do you attend a study scoping meeting (in accordance with LPP 95-07, June 20, 1995, p. 7) or an early coordination meeting (in accordance with LPP 96-04, July 1996, Step 10, p. 6-22)? | --- | --- |
| 16. Do you have a copy of the <i>Local Assistance Procedures Manual</i> dated February 1, 1998? | --- | --- |
| 17. Have you had an opportunity to follow the procedures set forth in Chapter 6? | --- | --- |
| 18. If yes, do you feel that these procedures contribute to the preparation of a quality document? | --- | --- |
| 19. Have you attended the Institute of Transportation Studies (ITS) Environmental Analysis for Local Agency Transportation Projects training course? | --- | --- |
| 20. If yes, did you feel that this training contributed to your preparation of a quality document? | --- | --- |

21. In order to develop guidelines to assist in the development of a “quality” technical report, we need to know precisely where the biggest problems are occurring. Considering **one** project that has experienced significant delays and/or problems, answer the following questions:

Identify the Federal-aid Project #: _____.

Then select from the following technical reports, prepared in support of the project, and indicate specific problem areas and/or suggestions for improving the process under each specific document.

Preliminary Environmental Study (PES) Form

Total time to Complete PES form and obtain Caltrans concurrence

- 1 week
- 2 weeks
- 3 weeks
- 1 month
- > 1 month

DLAE* Time to Review

- 1 week
- 2 weeks
- 3 weeks
- 1 month
- > 1 month

Causes for Revision

- Incomplete
- Insufficient supporting information
- DLAE did not concur

Further Reasons For Delays

- Obsolete PES form
- Non-responsiveness on the part of
 - Caltrans
 - FHWA
 - Resource Agency
- Lengthy review time on the part of
 - Caltrans
 - FHWA

Suggestions to Improve Quality

- More detailed instructions
- Attend Early Coord Mtg prior to studies
- Training for:
 - Consultants
 - Local agency
 - Public Works Directors
 - Planning staff
 - Environmental staff
 - Project Managers

Number of times PES was re-submitted to Caltrans:

- 1
- 2
- 3+

* DLAE - District Local Assistance Engineer

□ Section 4(f) - Publicly Owned, Public Park Lands, Wildlife Refuges, and Historic Sites

Number of Section 4(f) documents prepared and processed in last 3 years:: 1 2 3+

Are you familiar with the following Programmatic Section 4(f) Evaluations?

	<u>Yes</u>	<u>No</u>	<u># Processed in Last 3 Years</u>		
Bikeways and Walkways	---	---	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3+
Historic Bridge	---	---	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3+
Minor Use of Parklands	---	---	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3+
Minor Involvement with Historic Sites	---	---	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3+

What guidance do you follow when preparing a Section 4(f) Evaluation of local agency federal aid street and road projects off the State highway system?

- Local Programs Manual*, Volume III, Appendix D, Section 4(f) Evaluations
- Caltrans *Environmental Handbook*

□ Section 4(f) Draft	<u>DLAE Time to Review</u>	<u>Causes for Revision</u>	<u>Other Problems</u>	<u>Suggestions to Improve Quality</u>
	<input type="checkbox"/> 1 week	<input type="checkbox"/> Determined	<input type="checkbox"/> Insufficient # of copies	<input type="checkbox"/> Attend Early Coord Mtg prior to studies
	<input type="checkbox"/> 2 weeks	<input type="checkbox"/> incomplete in:	<input type="checkbox"/> Non-responsiveness	<input type="checkbox"/> Training for preparer
	<input type="checkbox"/> 3 weeks	<input type="checkbox"/> Project/Action	<input type="checkbox"/> on the part of	<input type="checkbox"/> Training for reviewers
	<input type="checkbox"/> 1 month	<input type="checkbox"/> Sec 4(f) property	<input type="checkbox"/> Caltrans	<input type="checkbox"/> Sample consultant contract
	<input type="checkbox"/> 2-6 months	<input type="checkbox"/> Impacts	<input type="checkbox"/> FHWA	<input type="checkbox"/> Sample draft 4(f) document
	<input type="checkbox"/> > 6 months	<input type="checkbox"/> Avoidance	<input type="checkbox"/> Jurisdictional agency	<input type="checkbox"/> Complete and sufficient review
		<input type="checkbox"/> alternatives	<input type="checkbox"/> Lengthy review of	<input type="checkbox"/> checklists
		<input type="checkbox"/> Evidence of	<input type="checkbox"/> draft on the part of	<input type="checkbox"/> Specific content requirements
		<input type="checkbox"/> coordination	<input type="checkbox"/> Caltrans	<input type="checkbox"/> set forth by
		<input type="checkbox"/> with jurisdictional	<input type="checkbox"/> FHWA	<input type="checkbox"/> <input type="checkbox"/> FHWA
		<input type="checkbox"/> agency	<input type="checkbox"/> Jurisdictional agency	<input type="checkbox"/> Caltrans
Total time to prepare Section 4(f)			<input type="checkbox"/> Over looked Sec. 4(f)	<input type="checkbox"/> Standardized document
<u>Evaluation and obtain FHWA approval</u>			<input type="checkbox"/> during PES	<input type="checkbox"/> content checklist
<input type="checkbox"/> 1 month			<input type="checkbox"/> Discovered Sec. 4(f)	
<input type="checkbox"/> 2-3 months			<input type="checkbox"/> involvement after	
<input type="checkbox"/> 4-6 months			<input type="checkbox"/> HPSR/Determination	
<input type="checkbox"/> 7-12 months			<input type="checkbox"/> of Eligibility/Determination	
<input type="checkbox"/> > 1 year			<input type="checkbox"/> of Effect	
<input type="checkbox"/> > 2 years				

Number of times technical report was re-submitted to Caltrans: 1 2 3+

□ Section 106 - Cultural Resources

Type and number of Section 106 documents prepared and processed in last 3 years: 1 2 3+

What guidance do you follow when preparing a Section 106 document (Historic Property Survey Report/Determination of Eligibility/Determination of Effect) for federal-aid projects **off** the State highway system?

- Local Programs Manual, Volume III, Appendix F, Cultural Resources*
- Caltrans Environmental Handbook*
- Guidance for Consultants, Procedures for the Protection of Historic Properties Section 106 Process*
- Other. Please specify _____.

□ Section 106 - Establishing the Area of Potential Effects (APE) Map

Total time to develop APE map and obtain FHWA approval

- 1 week
- 2 week
- 3 week
- 1 month
- > 1 months

DLAE Time to Review

- 1 week
- 2 weeks
- 3 weeks
- 1 month
- 2-6 months
- > 6 months

Causes for Revision

- Incomplete
- Insufficient
- Unacceptable to CT
- Unacceptable to FHWA
- Biased

Other Problems

- FHWA disagrees with Area of Potential Effect (APE) Map
- Caltrans disagrees with Area of Potential Effect (APE) Map
- FHWA Agrees/ Caltrans Disagrees with APE Map
- FHWA Agrees/ SHPO Disagrees
- Overlooked Sec. 106 during Preliminary Environmental Studies
- Caltrans Disagrees with Minimal APE
- Non-responsiveness on the part of
 - Caltrans SHPO
 - FHWA ACHP
- Lengthy review time on the part of
 - Caltrans SHPO
 - FHWA ACHP

Suggestions to Improve Quality

- Attend Early Coord Mtg prior to studies
- Training for preparer
- Training for reviewers
- More authority to work with the SHPO
- Sample consultant contracts
- Consultant qualifications
- Standardized document content checklists
- Sample technical reports
- Specific content requirements set forth by FHWA or SHPO

Number of times APE was re-submitted to Caltrans:

- 1
- 2
- 3+

□ Section 106 - Historic Property Survey Report (HPSR) and Determination of Eligibility

Select one:

- Archeological Site
- Architectural
- Historic Resource
- Historic Bridge

- | | |
|---|--|
| <p><u>Time to Review</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> 1 week <input type="checkbox"/> 2 weeks <input type="checkbox"/> 3 weeks <input type="checkbox"/> 1 month <input type="checkbox"/> 2-6 months <input type="checkbox"/> > 6 months | <p><u>Causes for Revision</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input type="checkbox"/> Insufficient <input type="checkbox"/> Caltrans does not concur with findings <input type="checkbox"/> FHWA does not concur with findings |
|---|--|

- Other Problems
- Insufficient # of copies
 - Non-responsiveness on the part of
 - Caltrans
 - FHWA
 - Resource Agency
 - Lengthy review time on the part of
 - Caltrans
 - FHWA
 - SHPO
 - ACHP

- Suggestions to Improve Quality
- Attend Early Coord Mtg prior to studies
 - Training for preparers
 - Training for reviewers
 - More authority to work directly with the SHPO
 - Sample consultant contracts
 - Consultant qualifications
 - Sample HPSR
 - Specific content requirements set forth by
 - SHPO
 - FHWA
 - Standardized document content checklist

Total time to prepare HPSR/Determination of Eligibility and obtain SHPO/ACHP concurrence

- < 3 months
- 3-6 months
- 7-12 months
- > 1 year
- > 2 years

If your Historic Property Survey Report (HPSR)/Determination of Eligibility was prepared for a Historic Architectural or Historic Resource (such as a road, canal, trail, etc.), and determined to be incomplete by Caltrans, FHWA, SHPO or the ACHP please indicate which required component was missing:

- APE
- Review of existing information on historic properties potentially affected
- Views of the SHPO on the identification of historic properties
- Efforts to identify to historic properties
- Evaluate the historic significance using the National Register criteria
- Description of the resource
- Statement of significance
- Photographs
- Map
- Classification of the resource (site building, object structure, district, etc.)
- Establish boundaries
- Level of significance (Local, State or National)
- Time period of significance
- Which National Register criteria the property was found to be eligible under
- Physical description of the property (name, location, ownership, etc.)

If your Historic Property Survey Report (HPSR)/Determination of Eligibility was prepared for an Archaeological Site, and determined to be incomplete by Caltrans, FHWA, SHPO or the ACHP please indicate which required component was missing:

- | | | |
|---|---|--|
| <input type="checkbox"/> Site boundaries | <input type="checkbox"/> Description of the project | <input type="checkbox"/> Survey methodology |
| <input type="checkbox"/> Site trinomials (given by info center) | <input type="checkbox"/> APE | <input type="checkbox"/> Description of the site and reasons why it is significant |

Number of times technical report was re-submitted to Caltrans: 1 2 3+

Section 106 - Determination of Effect

Select one:	<u>Time to Review</u>	<u>Causes for Revision</u>	<u>Other Problems</u>	<u>Suggestions to Improve Quality</u>
<input type="checkbox"/> Prehistoric Archaeological Site				
<input type="checkbox"/> Historic Archaeological Site	<input type="checkbox"/> 1 week	<input type="checkbox"/> Incomplete	<input type="checkbox"/> Insufficient # of copies	<input type="checkbox"/> Attend Early Coord Mtg prior to studies
<input type="checkbox"/> Historic Architectural Property	<input type="checkbox"/> 2 weeks	<input type="checkbox"/> Insufficient	<input type="checkbox"/> Non-responsiveness on the part of	<input type="checkbox"/> Training for preparers
<input type="checkbox"/> Historic Bridge	<input type="checkbox"/> 3 weeks	<input type="checkbox"/> Caltrans disagrees with conclusions	<input type="checkbox"/> Caltrans	<input type="checkbox"/> Training for reviewers
<input type="checkbox"/> Historic Resource (roads, canals, linear features)	<input type="checkbox"/> 1 month	<input type="checkbox"/> FHWA disagrees with conclusions	<input type="checkbox"/> FHWA	<input type="checkbox"/> More authority to work directly with the SHPO
	<input type="checkbox"/> 2-6 months	<input type="checkbox"/> SHPO disagrees with conclusions	<input type="checkbox"/> SHPO	<input type="checkbox"/> Sample consultant contracts
	<input type="checkbox"/> > 6 months	<input type="checkbox"/> ACHP disagrees with conclusions	<input type="checkbox"/> Lengthy review time on the part of	<input type="checkbox"/> Consultant qualifications
		<input type="checkbox"/> Caltrans disagrees with Memorandum of Agreement	<input type="checkbox"/> Caltrans	<input type="checkbox"/> Sample request for determination of effect
			<input type="checkbox"/> FHWA	<input type="checkbox"/> Specific content requirements set forth by
			<input type="checkbox"/> SHPO	<input type="checkbox"/> CT
			<input type="checkbox"/> ACHP	<input type="checkbox"/> FHWA
				<input type="checkbox"/> SHPO
				<input type="checkbox"/> ACHP
				<input type="checkbox"/> Standardized document content checklists

If your **Determination of Effect** document was determined to be **incomplete or insufficient** by Caltrans, FHWA, SHPO or the ACHP please indicate which required component was missing:

- Description of the undertaking
- Description of the historic property that might be affected
- Description of the efforts used to identify the historic property
- Application of criteria of effect (So if no adverse effect, explain why)
- View of the SHPO on the effect determination as well as local governments, Indian tribes, federal agencies and the public
- If effect, description of the undertakings effect on the historic property

Please indicate which agency determined the documentation to be **incomplete or insufficient**

- Caltrans District
- Caltrans Headquarters
- FHWA
- SHPO
- ACHP

Number of times technical report was re-submitted to Caltrans: 1 2 3+

□ E.O. 11990 - Wetlands

Type and number of Wetland Evaluations prepared:

	<u># Processed in Last 3 Years</u>		
<input type="checkbox"/> Categorical Exclusion with Protection of Wetlands Statement	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3+
<input type="checkbox"/> Wetlands Only Practicable Alternatives Finding	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3+

What guidance do you follow when preparing a Wetland Evaluation for federal-aid projects **off** the State highway system?

- Local Programs Manual*, Volume III, Appendix H, Wetlands
- Caltrans Environmental Handbook
- Consultants Guidance for Natural Environment Studies (NES)
- Other. Please specify _____.

<u>Total time to complete the wetland evaluation and obtain FHWA finding</u>	<u>Time to Review</u>	<u>Causes for Revision</u>	<u>Other Problems</u>	<u>Suggestions Improve Quality</u>
<input type="checkbox"/> < 3 months	<input type="checkbox"/> 1 week	<input type="checkbox"/> Incomplete	<input type="checkbox"/> Insufficient # of copies	<input type="checkbox"/> Attend Early Coord Mtg prior to studies
<input type="checkbox"/> 3-6 months	<input type="checkbox"/> 2 weeks	<input type="checkbox"/> Insufficient	<input type="checkbox"/> Non-responsiveness	<input type="checkbox"/> Training for preparers
<input type="checkbox"/> 7-12 months	<input type="checkbox"/> 3 weeks	<input type="checkbox"/> Caltrans	on the part of	<input type="checkbox"/> Training for reviewers
<input type="checkbox"/> > 1 year	<input type="checkbox"/> 1 month	disagrees with	<input type="checkbox"/> Caltrans	<input type="checkbox"/> Sample consultant contracts
<input type="checkbox"/> > 2 years	<input type="checkbox"/> 2-6 months	wetland boundary	<input type="checkbox"/> FHWA	<input type="checkbox"/> Consultant qualifications
	<input type="checkbox"/> > 6 months	<input type="checkbox"/> FHWA disagrees with wetland boundary	<input type="checkbox"/> Resource agency	<input type="checkbox"/> More authority to work with ACOE and FWS
		<input type="checkbox"/> Army Corps of Engineers disagrees with wetland boundary	<input type="checkbox"/> Lengthy review time on the part of	<input type="checkbox"/> Sample wetland evaluation
		<input type="checkbox"/> Disagrees with determination of minimal effect	<input type="checkbox"/> Caltrans	<input type="checkbox"/> Specific content requirements set forth by
		<input type="checkbox"/> Caltrans	<input type="checkbox"/> FHWA	<input type="checkbox"/> ACOE
		<input type="checkbox"/> U. S. Fish and Wildlife Service (FWS)	<input type="checkbox"/> Resource agency	<input type="checkbox"/> FWS
		<input type="checkbox"/> Army Corps of Engineers (ACOE)	<input type="checkbox"/> Other. Specify _____	<input type="checkbox"/> FHWA
		<input type="checkbox"/> Evaluation did not:		<input type="checkbox"/> Standardized document content checklists
		<input type="checkbox"/> Identify wetland boundaries		<input type="checkbox"/> Assess wetland values and significance
		<input type="checkbox"/> Evaluate project impacts		<input type="checkbox"/> Contain alternatives to avoid
		<input type="checkbox"/> Contain measures to minimize harm		<input type="checkbox"/> Report prepared by biologist without wetland evaluation experience
		<input type="checkbox"/> Evaluation undertaken outside growing season		

Number of times technical report was re-submitted to Caltrans:

- 1 2 3+

Section 7 - Biological Assessments

Type and number of Biological Reports prepared:

- Biological Survey
 Biological Assessment

Processed in Last 3 Years

- 1 2 3+
 1 2 3+

What guidance do you follow when preparing a Biological Report for federal-aid projects **off** the State highway system?

- Local Programs Manual*, Volume III, Appendix I, Guidelines for Compliance with the Endangered Species Act of 1973
 Caltrans Environmental Handbook
 Consultants Guidance for Natural Environment Studies (NES)
 Other. Please specify _____.

Total time to complete the Biological Assessment and Obtain opinion from FWS

- < 3 months
 3-6 months
 7-12 months
 >1 year
 > 2 years

Time to Review

- 1 week
 2 weeks
 3 weeks
 1 month
 2-6 months
 > 6 months

Causes for Revision

- Incomplete
 Insufficient
 Local agency delayed initiating Biological Assessment
 Report conclusions
 Inaccurate or
 Biased
 Reviewers determined BA did not contain:
 Project description
 Summary of findings and recommendations
 Survey results
 Background information
 Certification by Biologist
 Appropriate maps

Other Problems

- Insufficient # of copies
 Non-responsiveness on the part of
 Caltrans
 FHWA
 FWS/NMFS*
 Lengthy review time on the part of
 CT
 FHWA
 USFWS
 NMFS
 Caltrans not certain as to when to request technical assistance
 Missed survey window

Suggestions to Improve Quality

- Attend Early Coord Mtg prior to studies
 Training for preparers
 Training for reviewers
 Sample consultant contract
 Consultant qualifications
 More authority to work with Fish and Wildlife Service and National Marine Fisheries Service
 Specific content requirements of the Biological Assessment set forth by
 FWS
 NMFS
 FHWA
 Standardized document content checklists

Number of times technical report was re-submitted to Caltrans:

- 1 2 3+

* FWS - Fish and Wildlife Service/ NMFS - National Marine Fisheries Service

□ E.O. 11988 - Floodplains

Type and Number of Floodplain Evaluations prepared:

Processed in Last 3 Years

- | | | | |
|---|----------------------------|----------------------------|-----------------------------|
| <input type="checkbox"/> Categorical Exclusion with Summary of Floodplain Encroachment Form | <input type="checkbox"/> 1 | <input type="checkbox"/> 2 | <input type="checkbox"/> 3+ |
| <input type="checkbox"/> Floodplain Evaluation | <input type="checkbox"/> 1 | <input type="checkbox"/> 2 | <input type="checkbox"/> 3+ |

What guidance do you follow when preparing a Floodplain Evaluation for local agency federal-aid street and road projects off the State highway system?

- Local Programs Manual*, Volume III, Appendix J, Floodplain
- Caltrans Environmental Handbook
- Other. Please specify _____.

Total time to complete Floodplain Evaluation and obtain FHWA Finding

Time to Review

Causes for Revision

Other Problems

Suggestions Improve Quality

- | | | | | |
|--------------------------------------|-------------------------------------|--|---|--|
| <input type="checkbox"/> < 3 months | <input type="checkbox"/> 1 week | <input type="checkbox"/> Incomplete | <input type="checkbox"/> Insufficient # of copies | <input type="checkbox"/> Attend Early Coord. Mtg prior to study |
| <input type="checkbox"/> 3-6 months | <input type="checkbox"/> 2 weeks | <input type="checkbox"/> Insufficient | <input type="checkbox"/> Non-responsiveness on the part of | <input type="checkbox"/> Training for preparers |
| <input type="checkbox"/> 7-12 months | <input type="checkbox"/> 3 weeks | <input type="checkbox"/> Did not check NFIP maps | <input type="checkbox"/> Caltrans | <input type="checkbox"/> Training for reviewers |
| <input type="checkbox"/> > 1 year | <input type="checkbox"/> 1 month | <input type="checkbox"/> Technically inaccurate | <input type="checkbox"/> FHWA | <input type="checkbox"/> Sample consultant contracts |
| <input type="checkbox"/> > 2 years | <input type="checkbox"/> 2-6 months | <input type="checkbox"/> Biased | <input type="checkbox"/> Lengthy review time on the part of | <input type="checkbox"/> Consultant qualifications |
| | <input type="checkbox"/> > 6 months | <input type="checkbox"/> Conclusion inaccurate | <input type="checkbox"/> Caltrans | <input type="checkbox"/> Sample technical reports |
| | | <input type="checkbox"/> Other | <input type="checkbox"/> FHWA | <input type="checkbox"/> Specific content requirements set forth by FHWA |
| | | <input type="checkbox"/> Reviewer commented that evaluation did not: | | <input type="checkbox"/> Standardized document content checklists |
| | | <input type="checkbox"/> Determine encroachment | | |
| | | <input type="checkbox"/> Evaluate impacts | | |

Number of times technical report was re-submitted to Caltrans:

- 1 2 3+

Comments

Identify any other specific problems you encountered in the development and processing of technical reports for this federal-aid project that are not covered by questions of this survey.