

Comments and Frequently Asked Questions - ITD 654		ITD Response
Form and Instructions - General Comments	both 654 and 649 - need revisions for LHTAC Districts. Have had some confusion, users want to select ITD District then don't know what to list for Local Sponsor.	Added new drop down for selection of the "LHTAC" District location. Also added instructions. Added space between the ITD/LHTAC/ ACHD selections for ease of use.
	July 2020 - new issue. Signatures have been revised to only 2 signatures from the District, none from the consultants. So if the Consultant fields are left blank, how do the reviewers know when a consultant was used?	If the fields are left blank, this indicates to the ITD HQ reviewer that the document was completed in-house.
	the form is locked, so the following are problems: no spell check, no multiple selections for drop downs, no tracked changes versions, no adding to tables.	To unlock the document: Go to the Review tab at the top, then click on Restrict Editing. A panel should come up to the right side. Hit the button on the bottom that says Stop Protection. If it asks for a password, hit enter – there is no password.
Project Description and Purpose and Need	No comments or questions to date.	
	Maps and photos - locked document does not allow for as many maps and photos as I want to add. Instructions are not helpful.	Save the document as a pdf and insert maps and photos to replace those pages. Add signatures last.
Environmental Summary General	Suggestion: would help reviewers if the user would add a note in the Comment column : "See Analysis Sheet" when one is attached.	agreed. Added throughout the instructions.
Land Use - Management, Agencies, Tribal	This section is confusing. Regular scoping occurs on projects, should every agency be listed here?	This section is meant to capture management and jurisdictional interests on lands. Those agencies and tribes with lands would be included here; all other agencies with interests pertaining to resources will be noted and captured on other analysis sheets.
Coord and Outreach	On Instructions Page 11 it says the Public Outreach Planner (POP) "should be accessed to determine the level of public involvement necessary for a project". It also says, "Ensure that the POP has been accessed, either by the Project Manager or by the Environmental Planner, and document the POP level of the project." DEPs have not used the POP, may need training?	The POP link is provided in the instructions. The ITD Public Involvement Guide states that ITD uses this tool to determine the level of involvement warranted for the type of project. ITD Environmental has not used the tool consistently and now is the time to implement it. It is a straightforward tool to help guide the process, and the idea is to complete the tool early and then coordinate with the PM on the outcome. Documenting the POP level is just the first step in what already occurs in some shape or form. The language will be modified, though - "should" will be changed to "encouraged".
Cultural	I believe that another option is needed in the 654 Cultural Resources section under Comment. Additional area and actions were added after SHPO-concurred 1502 was approved. additional area and actions information was submitted to HQ Cultural (Marc) which resulted in him communicating with SHPO. In an email, SHPO acknowledged the slight change and determined "Overall project actions will remain with a determination of no adverse effect to historic properties". Marc provided an email as SHPO's comment documentation and requested that I include the email in the environmental document. Question is how to document on the new 654.	Instructions have been revised to read: Go through the process to obtain an ITD Determination of Significance and Effect (1502) form to determine if historic properties/sites (eligible for or listed on the NRHP) are present in the project impact area and check the appropriate "Yes" or "No" box to indicate presence. Next, indicate whether the project will have any effect on eligible sites (ANY effect = "yes"). Indicate the documentation required for Section 106 compliance in the Comment column (the checkboxes match what is marked on the ITD 1502). Use the blank text box in the comment column to list any other required documentation that is attached or saved to ProjectWise. Indicate whether mitigation is required. The Analysis Sheet is the ITD 1502 and/or equivalent.
	Instructions: "use the 1500..." revise to Determination of Eligibility - match the 1502.	see above response. Also added a third row in the left column for "effect".
	When we have easements across BLM or Forest Service lands, those agencies provide section 106 clearance for the sections of roadway across those lands and Marc provides clearance for the non-federal land. Attached is an email from Marc presenting the BLM and ITD section 106 clearance for a 28 mile seal coat project and requesting that both be included in the environmental document.	see above response. Indicate that additional documentation is attached from BLM with the 1502.
	Summary Sheet - cultural is missing "effect" question	Added.
4f	Table needs adjustments. Agency concurrence isnt required most of the time. Maybe pull out temporary and constructive and exceptions as separate from use?	Table revised and agency concurrence removed. Temporary and constructive uses are separate from the other uses, and exceptions will be noted.
6f	No comments or questions to date.	
Farmland	No comments or questions to date.	
Hazardous Materials	The level of risk is unclear and subjective.	This manual section to be reviewed and revised in Fall/Winter 2020.
	For the Hazardous Materials Evaluation Sheet, the instruction state that Terradex lists agency contacts for each site (EPA, Health, DEQ assumed). I did not see an explicit contact for the EPA on its website. Is there a particular person that ITD has coordinated contacting for the form?	No POC at the EPA. Contact the ITD HQ SME (Vicky Jewell) for more information.
	How to find groundwater level or flow direction? Need to provide links.	See response below.
	Need definitions for this and all sheets. Load bearing structures, asbestos containing?	This manual section, including definitions, to be reviewed and revised in Fall/Winter 2020.
	Paint striping obliterated? Isn't that all projects?	This section will be updated with the manual updates.
	Maybe an example is needed for suspected land uses.	This manual section, including definitions, to be reviewed and revised in Fall/Winter 2020.
	I was not able to get a one mile radius search around the project. I just had to guess. There is no measuring tool to tell you the 1 mile radius. Is there another way to get the radius and how does one save the map? I went to the IDWR groundwater levels site to "determine the local depth of groundwater and general flow direction". I could not find a well anywhere near the project site to determine the depth to groundwater. There is no instruction on how far and wide you are supposed to look (something like find a well within 3 miles, 5 miles, etc. would help, but it doesn't say anything; and then you are just guessing that those wells within X distance are consistent with the groundwater elevations close to the project area, which is definitely a guess). Then it talks about general flow direction. I couldn't find anything on the site giving general flow direction of water anywhere. Please provide specifically how to determine general flow direction for remote areas.	The directions given on the 649 form apply to the 654 form as well. Will update to copy to both. The Terradex site has a scale at the bottom of the page as well as a button on the upper left titled "Advanced" with a drop down including "Radius Search" that can get you a 1-mile radius on the map. Then print the screen and save. Step by step instructions now include steps: topographical context, groundwater levels and flow direction.
FAA	Need to add to instructions a distance to determine if an airport is in the vicinity. What is the vicinity? 2 miles? 1 mile? Should not have to guess and use the Notice Criteria tool if an airport is not nearby. What about Airport Area of Influence?	Revised the instructions to "vicinity". Add a footnote with a link, ITD and FAA instructions give a 20,000-ft distance as the farthest to be of concern.
Noise	No comments or questions to date.	
Air	No comments or questions to date.	
Visual	The list of project activities and sites/resources in the summary sheet is extensive, and will be costly to projects compared to the actual impact... which will be very little to none.	This manual section, including definitions, to be reviewed and revised in Fall/Winter 2020.
	Visual - what about lighting changes? Example is a 4-way stop changing to a full intersection with lighting. This can be documented in visual.	This is a minor effect but one that should be documented. The visual analysis page has new language from the FHWA VIA website stating that the analysis can conclude "no effect". This way, the CE still documents the change but still no effect to the visual quality of the area.
	Analysis Sheet - this bulleted list is loaded with potential work.	This manual section, including definitions, to be reviewed and revised in Fall/Winter 2020.
Social, Econ, Community	No comments or questions to date.	
EJ	No comments or questions to date.	
Waters and Wetlands	No comments or questions to date.	

Floodplains and Floodways	No comments or questions to date.	
Wild and Scenic Rivers	Wild and Scenic Rivers - how does the reviewer know that this was reviewed?	It is the responsibility of all ITD Environmental Planners and consultants to know the processes involved, as well as the guidance and best available data. In this example, the reviewer must have an understanding of the wild and scenic rivers in Idaho and can review maps/lists of these resources if unsure. It is not the responsibility of the preparer to access all websites and copy all data available to prove the research was conducted (don't have to "prove the NO").
Sole Source Aquifer	No comments or questions to date.	
T&E species	Would like to be able to select "no ground disturbance" in the dropdowns.	Added.
EFH	Please add link in instructions to new mapper.	Added, and EFH mapper will still be used. Hyperlinks to both in footnotes. Some of analysis sheet for this section has been revised to incorporate EFH into the T&E, and Freshwater Salmon EFH added to the dropdown menus.
	Some essential fish are not included in the dropdown.	Item added to dropdown: "Freshwater Salmon Essential Fish Habitat"
SGCN	SGCN conservation planning tool/analysis - Where is the protocol, or procedure, what to do and how to do it. I have logged into the IDFG site, then what?	Conservation planning tool/analysis - For the conservation planning tool, use the link: https://idfg.idaho.gov/ifwis/conservationplanner/ Once you get the list for just the Tier 1 species, contact (by email) your local IDFG Rep and ask if he/she has any recommendations for these species. If they do, then add them to the Idaho Species of Greatest Concern table in the 654. If no recommendations, leave the table blank or state "no recommendations". Then if ITD agrees to implement any measures based on the recommendations, add those to the commitments page.
Federal Species	No comments or questions to date.	
Migratory Birds, Bald and Golden Eagles	Revise instructions. Summary sheet instructions give a specific commitment that includes April-August. General commitments are now in the Standard Specs.	This section has been revised and removed from the Analysis Sheet entirely. District Planner is responsible for getting a commitment together, if different from specs.
Construction - Temporary	No comments or questions to date.	
Permits	Should add Coast Guard and levee permits	Added to Summary Sheet and Analysis Sheet.
	NPDES - summary sheet does not have a space for no ground disturbance.	Summary Sheet - added a blank text box that can be used for this type of situation or for more than one segment.
Commitments/Mitigation	No comments or questions to date.	

EPM = Environmental Process Manual; SME = Subject Matter Expert

Comments and Frequently Asked Questions - ITD 654		ITD Response
Form and Instructions - General Comments	just an overall comment, the spacing is very tight on instructions. It makes it a little difficult to read. Are we trying to save pages? Also the headers and font size seem to be out of proportion.	The instructions are an attempt to provide some brief information on a particular item without being overwhelming in pages. The spacing may be adjusted in future versions.
	Signatures - digital? Bluebeam and adobe lock the document.	Revised in version 2. The instructions have been clarified to state the digital signature, which can be a certificate or a stamp, is required.
	Signatures - the number of consultant and agency signatures is too much.	Revised in version 2. Changes: the consultant name and company can be typed, no signatures from consultants required. Two Preparer signatures are required prior to the Approver signature.
	649 form - should have some statement on the form and on instructions that points the user to the 649 when doing a minor project.	Revised in version 2.
	the form is locked, so the following are problems: no spell check, no multiple selections for drop downs, no tracked changes versions, no adding to tables.	
	Instructions have links that don't hyperlink. Can this be changed?	The version of Adobe may be a factor. The instructions found on ITD Form Finder has active hyperlinks..
Project Description and Purpose and Need	ROW - What does "and affects the function of the primary use of the property? What is the benchmark to analyze this by?	Definitions are currently being compiled. Work with the team to build a clear understanding of these terms, and use FHWA resources.
	Changes in Access and Access Control - Have we defined this somewhere? I see a many interpretations of what a change in access means.	Definitions are currently being compiled. Work with the team to build a clear understanding of these terms, and use FHWA resources.
	Changes in traffic patterns - Need definitions. What's the benchmark for adversely affected?	Definitions are currently being compiled. Work with the team to build a clear understanding of these terms, and use FHWA resources.
Land Use - Management, Agencies, Tribal	Area vs. project area vs. study area?	Definitions are currently being compiled. Work with the team to build a clear understanding of these terms, and use FHWA resources.
Coord and Outreach	Public Coordination and Outreach - how to complete the checkboxes on LEP, minority and low-income populations? What if these populations are present in the project area but no additional outreach was conducted? NEPA may not require, EJ may not require due to the PA, but ITD and FHWA may still require. How to proceed in this document?	THE EPM will require further guidance and instructions will follow. For now, information will be included in a blank comment box to indicate whether additional outreach was conducted. This form is not intended to give guidance on what is required but how to document what has been done.
Cultural	No comments or questions to date.	
4f	Analysis Sheet - needs revision to show that official with jurisdiction must concur, not FHWA.	Revised the analysis sheet extensively. Analysis sheet has been reconfigured. The table in the analysis sheet will capture the documentation for each 4f resource, including the final coordination/concurrence by the official with jurisdiction and/or FHWA.
	Analysis sheet and Instructions - need revision. Temporary occupancy is not a "use". Also analysis sheet is difficult to complete when more than one resource is present and impacted. See 4f Policy Paper.	Revised the analysis sheet extensively. Analysis sheet has been reconfigured. The table in the analysis sheet will capture the documentation for each 4f resource, including the final coordination/concurrence by the official with jurisdiction and/or FHWA.
6f	No comments or questions to date.	
Farmland	No comments or questions to date.	
Hazardous Materials	The level of risk is unclear and subjective.	This section to be reviewed and revised in Fall 2020.
	For the Hazardous Materials Evaluation Sheet, the instruction state that Terradex lists agency contacts for each site (EPA, Health, DEQ assumed). I did not see an explicit contact for the EPA on its website. Is there a particular person that ITD has coordinated contacting for the form?	
	How to find groundwater level or flow direction? Need to provide links.	
	Need definitions for this and all sheets. Load bearing structures, asbestos containing?	
	Maybe an example is needed for suspected land uses.	
FAA	Is there a distance limit to civil aviation airports? I.e., if over 5 miles, then no impact?	The FAA requires coordination when construction will occur adjacent to an airport and when structures such as cranes over 200 ft in height are used during construction in proximity (FAA guidance states "...structure will be in proximity to a navigation facility"). The FAA Notice Criteria Tool is the best way to determine whether the FAA sees a risk. If there is an airport in the vicinity, go to the tool and follow the instructions.
Noise	No comments or questions to date.	
Air	No comments or questions to date.	
Visual	The list of project activities and sites/resources in the summary sheet is extensive, and will be costly to projects compared to the actual impact... which will be very little to none.	This section may be updated in the future.
	Analysis Sheet - this bulleted list is loaded with potential work.	
Social, Econ, Community	"If new ROW is required..." - So the district planner will have to coordinate with FHWA and get a sign off?	No. Projects with ROW acquisition that also affect the primary function of a property may be determined to be no-programmatic and go to FHWA for approval. When this situation occurs, further analysis of community impacts may also be warranted.

	Define these resources and provide examples.	Definitions are currently being compiled. Work with the team to build a clear understanding of these terms, and use FHWA resources.
	Define short term and permanent changes to roadway access.	Definitions are currently being compiled. Work with the team to build a clear understanding of these terms, and use FHWA resources.
EJ	More definition needed, specifically when there are known populations in the project area but the EJ Programmatic indicates no analysis is warranted.	Definitions are currently being compiled and HQ is working on guidance. Work with the team to build a clear understanding of these terms, and use FHWA resources.
Waters and Wetlands	Summary Sheet: Add mention of USCG bridges here?	Revised. Instructions may include further reference to permits sheet and comment column may include list of permits required or reference to permits sheet. Will be shown in version 2.
Floodplains and Floodways	No comments or questions to date.	
Wild and Scenic Rivers	No comments or questions to date.	
Sole Source Aquifer	<ul style="list-style-type: none"> Going through the new 654 form for sole source aquifers (SSA), it does not look like we need an EPA review. The boilerplate finding in the 654 form is a little vague though, as it does not say exactly how deep penetration into the ground is allowed. Given that the depth to water in the area is somewhere around 200 feet in a few groundwater wells I looked up, our excavation or penetration will not even come close to that (I'm told around 50 feet max). Also, no boxes needed checked in the SSA analysis sheet in the 654 form. 	the prudent thing to do is to go to the EPA anyway. The language in the finding where no EPA review is necessary states: "Project activities are limited to minimal grading and/or excavation and no activities that will involve penetrating deeply into the ground..." Generally.... whenever disturbance could be considered more than "minimal" ... let's encourage the consultants to complete the SSA checklist and go to the agency for a quick review.
T&E species	FHWA expressed concern with the "No Effect Determination" table, and no requirement to analyze the effect on the species.	No change at this time.
EFH	New link to be added for EFH mapper.	Revised; new link given on form and in instructions in version 2.
SGCN	This section is written for ITD internal users only. Consultants do not have access to the Conservation Planning Tool. Should either be revised for IFWIS use or planners can get the SGCN list and provide to consultants as part of the scope.	This section may be updated as access is provided to consultants in the future.
Federal Species	No comments or questions to date.	
Migratory Birds, Bald and Golden Eagles	No comments or questions to date.	
Construction - Temporary	Detours in AQ non-attainment or maintenance area - "coordinate with ITD HQ". What then?	Work with HQ SME and District SME to determine a course of action in this situation.
Permits	No comments or questions to date.	
Commitments/Mitigation	No comments or questions to date.	

EPM = Environmental Process Manual; SME = Subject Matter Expert

	New 654 Document Process Categorized Comments and HQ Responses Sept 2020	HQ Response
Intro	<p>Issues with the New 654 form(s) brought forward from Senior Environmental Planners (SEP) and Consultants. The names of the SEP and the consultants who provided comments were removed so focus would be on the comment rather than who made the comment.</p> <p>Below is a short list of question that were asked of SEP and consultants. Provide the following:</p> <ol style="list-style-type: none"> 1. Items in the NEW 654 that are confusing concerning what is asked for and how to provide it. 2. Anything in the NEW 654 that has a process that is not clear or you think needs more clarification to the protocol we are supposed to follow. 3. Anything in the NEW 654 that you think just doesn't work. 4. Anything in the NEW 654 where you think some training might help you to understand how to do the process or clarification on what to do. 5. Also looking for input you can provide that gives input on consultant contracts and the cost and time to do the NEW 654 process compared to the old process. <p>Comments received were put into categories based on the format and layout of the New 654 form. If comments were received that did not align with a specific category in the New 654 form then the comments were given their own section title and those sections are list here first in italics.</p>	<p>Red text throughout the document are responses from HQ ENV. Any place where there is an *, changes have been made to either the instructions, the form, or both.</p>
Training Needs	<p>Many new processes and procedures are now required to complete the New 654 form. Training is needed to train the SEP and EP in the new processes and at a minimum filling out the new form. Analysis needs to be simplified not more confusing, more difficult and much more time consuming. Training for all involved on the use of the Public Outreach Planner (POP) is needed.</p> <p>Training on visual quality and the amount of information on purpose and need and logical termini. It is required more and more but there is no spot for it.</p>	<p>This is subjective, as what may seem new to one EP may not be new to another. What we heard during our many statewide meetings on this form was that there are processes and procedures that the majority were aware of but did not follow, or were following but the use was inconsistent. As we never had any procedures written down before, in a way, all is new. However, all EPs were able to complete documents in the past. We also heard and decided that training would wait until all could dig in and use the form, develop an understanding of how it functions, and then bring their input.</p>
New 654 Process and Roll Out	<p>The revocation of the old 654 form and when to start using the new 654 form has been confusing. A meeting with all EP's took place on January 23, 2020 and it was stated by HQ at that meeting: "If you have started the 654 process before today then continue with the old form and process". HQ is now saying since the old 654 form has been removed from form finder all new environmental documents must follow the new process since the old form is no longer available. Projects that were started under the old process now must be changed to follow the new process. This change has caused delays in project delivery due to the new environmental document process and form(s).</p>	<p>If the project was scoped and started prior to January, the old form and method of documentation is still acceptable, assuming some writing has already occurred and information has been entered into the old form. The intent was that if the 654 was not started, the new one could be used. It was also made clear that it was the District prerogative to decide whether to have a consultant change and follow the new process if the old was already in place.</p>
General New 654 Form Comments	<p>The 654 form does not allow the spell check function to work. This should be fixed.</p>	<p>*This is a function of the form being locked, which is necessary to prevent the user from modifying the script of the form. Instructions on how to "unlock" the document have been sent out, so if it is necessary to do a spell check that can happen.</p>
	<p>I specifically tried to focus on things that I perceived as new items in terms of data requirements and/or questions and instances where the guidance isn't clear enough or is incomplete. These are the sort of problems that can lead inconsistency in terms of District preparation and HQ review as well as increase outsourcing costs, which I think we have already seen. All in all, I think the revision effort has been worthwhile but I do think there should be a group review or training session based on our collective experience with the form thus far; and it should be recognized that more time for beta testing is needed. I also want to have a chance to experience more consultant negotiations related to using this form</p>	<p>Beta testing could go on indefinitely, because we will be in transition to an online version. As we work through reviews at HQ, we are trying to align what the reviewers are looking for thus reducing some of the inconsistency, but it will take some time to bring all into alignment.</p>
	<p>The form does not allow you to modify tables and in many cases, we need to add rows to tables (e.g. supporting documents).</p>	<p>*The form is locked, so tables cannot be altered. The form can be easily unlocked and instructions have been distributed out to all EPs.</p>
	<p>The tables in the "Environmental and Engineering Commitments/Mitigation Measures Sheet" run out of the text box, also causing format issues.</p>	<p>*Version 2 contains additional blank text boxes. In addition, the form can be unlocked.</p>
	<p>Because of the formatting issues and it being a restricted document, you cannot delete unneeded pages in the Word document which results in wasted space. For example, if we check the 'no' box in the environmental summary for 4(f) resources, we could delete the entire page of the document making it a cleaner end product.</p>	<p>*This has been clarified with all users - the document must be saved to pdf prior to final approval. Therefore, any unused pages can at that time be deleted.</p>
	<p>Please combine the instructions for the analysis sheet(s) with the respective instructions for each 654 topic. Doing so would reduce the amount of scrolling necessary within the forms as well as some instances of redundancy.</p>	<p>Agreed. This has been realized, however, because we will be transitioning to the online form (and that will have instructions immediately underneath each question), it was decided that a change in format would not be appropriate at this time.</p>
	<p>I generally support the concept of the new form and see that it is in line with the NEPA intent that says you don't need a giant resources inventory but a focused discussion on the impacts. I think this new 654 form is a step toward that. Honestly, the new 654 or old 654, EA or EIS is not the issue in the cost or time in gaining project approval. It is the variability in the reviewers and the issue of reviewing for preference not compliance. This is the consultant community at large opinion. Many of us work for other DOT's and for other Divisions of FHWA and can tell you that ITD and the Idaho SHPO sit at the top of the hill for preference reviews. That costs the department a lot of time and money. Clearly we all make mistakes and at times the consultants work product is not up to par. That aside, compliance based reviews would be more attainable if all the reviewers were less a professional reviewer and had actually done NEPA and AHSR document work for the Department. What I mean by that is SHPO, HQ and the Districts should all be regularly clearing work for the districts not just commenting on district and or consultant work. Many comments are an attempt to second guess what the final reviewer will catch. If the District is okay with the submittal, unless there is a very clear fatal flaw or miss application of guidance, the document should move forward. You can rank the preparer after the fact and then give constructive criticism. I get that most folks are currently overtasked and don't have time for "one more thing". ITD has several high performers that should be shaping the path forward they just need more time to do it I think. I think offloading these right folks to allow them time to shape policy could be very beneficial.</p>	<p>The hope is to eliminate a lot of the writing that has been required in the past; therefore the subjectivity has also been reduced. With that, the hope is that the reviews will be shortened and smoother. I am trying to get to the point that the review at HQ is to make sure the administrative record is complete. This process has only been in place for under a year and it will take some time.</p>

	<p>As far as costs go for following the new 654 process, we need more data to see if it saves any effort. It seems like it will in time but has not yet. Certainly we are investing more time to “get up to speed” but that is expected.</p> <p>I do think it is cheaper but still have a learning curve so can’t effectively compare prices yet. Maybe half the price? I would imagine it is at least half the price just because we eliminated subjective editorial comments and different levels of detail. Putting together the information in a pdf, deleting out pages and organizing the info in PW and renaming all takes more time than you would think.</p> <p>Regarding the new 654 CE form and how it can be improved to better the department and efficiency with the 654 CE form. We had the following issues with the form and mappers when we drafted the 3-4 documents we have been involved with so far:</p> <p>Due to the grey field in your draft template, it is review restricted and it makes it difficult to change formatting so bullet points, etc., don’t align/nor look congruent in areas such as the project description field and throughout the rest of the document. I suggest getting rid of the grey field and only having the questions be review restricted. Such as the attached CE form utilized at the Alaska Department of transportation (AKDOT). AK DOT CE Form 07.08.2020.doc I like the Alaska document because it removes the subjectivity to some degree and it’s all on impacts.</p> <p>Clarify if you want citations for utilizing mappers and/or provide links to mappers you prefer (both local and federal) to be referenced in the CE form, such as the attached example Alaska DOT CE form. It gives you clarification as to what mappers each district would like the individual that is developing the form to cite.</p> <p>We also had issues with a few local mappers as follows. Local mappers we had issues with that were reviewed but appeared to not have sufficient data to asses an impact are the following:</p> <p>The IDEQ Leaking Underground Storage Tank Database Mapper doesn’t allow you to review any previous reports or documentation of LUSTS to give</p>	<p>This is not a specific requirement of the 654 and not a recent change. IDEQ is the keeper of this data and ITD has no authority over how this mapper functions.</p>
	<p>The IDEQ ground water quality monitoring and protection mapper had several red dots listed to click on, however, when you clicked to get reports, there were none available.</p>	<p>This is not a requirement of the new 654.</p>
	<p>The National Wetland Information USFW GIS mapper is aligned incorrectly. Furthermore, the NWI mapper is outdated for the area. Thus, making it difficult to assess environmental impacts to wetlands and Waters of the U.S. without doing a field review. While I understand we are completing and assisting in developing a local mapper to indicate wetlands, at this point in time a field review is necessary.</p>	<p>While reconnaissance-level reviews are sometimes acceptable, for the most part, assessment of environmental impacts will always require field review and verification. The use of existing available data is encouraged for scoping a project and if the project area is not well known by the consultant, extensive communication with the District Environmental Planner is required to gain better perspective of the site for scoping purposes.</p>
	<p>There are no local Golden or Bald Eagle Act GIS mappers indicating the location of potential nests. We can make an argument as to why there is low potential to encounter eagle nests based on specific vegetation in the area that is suitable for eagle nests, but it has been our experience that USFWS would like some form of documentation of this. Which, I would assume would be a small report (depending on project area). This also takes time and effort.</p>	<p>We do not ask for use of a mapper, it relies on the information in the IPAC data.</p>
	<p>More guidance on the naming convention for all files is needed and tied into the new form.</p>	<p>*Guidance issued 8/5/2020</p>
	<p>The use of ProjectWise needs to be tied down and incorporated more fully into the 654, is this the administration record or not?</p>	<p>*Yes, ProjectWise is considered the administrative record. HQ is requiring the use of PW for document submittals. Guidance issued 8/5/2020.</p>
	<p>Previously I had complained that there should be a standard naming format and file folder formats in ProjectWise to organize the documents and information so that the wrong document isn’t pulled. I think I saw some guidance come out about that however.</p>	<p>*Guidance issued 8/5/2020. We are working to address, however there is disagreement between the districts what the environmental folder should contain. I cannot make a recommendation to Beau until we have some sort of agreement.</p>
	<p>Some guidance is needed on how to deal with future reevaluations would be great.</p>	<p>The process for handling re-evaluations has not changed and is laid out in a joint agreement between FHWA and ITD, issued April 2019. This was also discussed during the bimonthly calls and is on the list to tackle an update.</p>
	<p>There are issues with the cells and not being able to add rows which results in combining several different document names and topics into the same cell.</p>	<p>*The form is locked, so tables cannot be altered. The form can be easily unlocked and instructions have been distributed out to all EPs.</p>
	<p>You should be able to add comments or use track changes during reviews. Otherwise we end up having to make new tools or word versions of the 654 to facilitate commenting.</p>	<p>*Guidance issued 8/5/2020. Submittals are now required to be pdf versions in order to make and respond to comments. Tracked changes are not possible on the word document.</p>
	<p>With all the macros corruption is going to be an issue at some point.</p>	<p>I would like to learn more about this, but as we move to the online version, this should not be an issue.</p>
	<p>No ability to track changes and or comment is very cumbersome. This would greatly help the review process if you could track changes and have comments between the author and the reviewer. If you can’t do this a single standard process of how comments are made and resolved is desperately needed at the district level and at HQ and agencies.</p>	<p>*Guidance issued 8/5/2020. As stated above, pdf for all versions.</p>
	<p>We need clarification on how the final document will be submitted. Can we convert it to .pdf and assemble the document body with supporting figures and photos, or does ITD intend on having the document live in Word format.</p>	<p>*This information is contained in the instructions and has since been clarified in ENV Memo 20-1</p>
	<p>Can the form be made so it is more useable/editable? It would be very helpful if all the standard word tools were not greyed out and inaccessible. Tracked changes, spellcheck, comments, highlighting, etc... are all disabled.</p>	<p>The word form is locked to keep people from changing it to fit their needs. We are working on trying to fix some of the issues associated with the locked form.</p>
<p>Categorical Exclusion Form - Instructions</p>	<p>QA/QC Requirements ITD Districts do not have QA/QC staff and personnel have been downsized so the only QA/QC review will be by the SEP (Senior Environmental Planner) in the District which may be the person who authored the 654 document. The direction that all documents must include a QA/QC prior to submittal to ITD is unclear what that means without QA/QC staffing.</p>	<p>The intent as laid out by the ITD QA/QC for CEs (shared with all ENV on 12/5/18) is that the District Planner acts as the QA/QC for consultant documents. If the planner created the document then they can have their HQ planner perform the QA/QC during their review.</p>
<p>Instructions</p>	<ul style="list-style-type: none"> - Need to know when listed items are “always required” vs “as applicable”. - In the Environmental Summary form, some confusion comes from assuming that, in the same row, items on left side are relating to items on right side. Not sure how to reconfigure to resolve that. 	<p>I would like to know more about this, as I may not understand the issue.</p>
	<ul style="list-style-type: none"> - If there’s a checkbox or comment option listed for something, direction should be provided as to how to fill that out in the instructions. 	<p>The instructions should cover what is needed, but without specifics, it is hard to address.</p>
	<ul style="list-style-type: none"> - Why are crucial links listed as footnotes rather in with the topic paragraph? 	<p>We considered this as a team and decided to format it this way. In the future online form, links may be included with the instruction immediately under the question.</p>

Categorical Exclusion Determination – Signature Page	Final digital signatures have been difficult working with pdf, acrobat pro certificates and signatures. There must be an easier way where several signatures from consultants, engineering leads, and SEP are not required. The Districts should be able to fill out the electronic form and get the required several signatures from a variety of signatories, scan the form with the signature and send the form to HQ for their review and final signature.	*Issues have been worked through. Digital signatures can be either adobe or Bluebeam and can be a stamp as long as a date and time are attached to the signature. We do not want scans because it reduces the quality of the document and is not optically optimized. In addition, only signatures needed are the PM and the ENV planner.
	You can't paste in signatures on the signature page.	*Correct, digital signatures are needed that show the date and time applied.
Project Description		
Purpose and Need	Purpose and need (P&N) is not something Project Managers (PM) know how to develop or what the requirements of a good P&N is and they usually don't develop one for simple Categorical Exclusion (Cat Ex) projects. Having the requirement of a P&N for Cat Ex projects is not needed. A good project description is always produced for several parts of the Cat Ex document (1500 document= cultural clearance document initiation) by a PM and a project description can be developed and usually is by the PM. The requirement should be for a project description rather than for both a P&N and project description.	This is not a new requirement; it was a part of the old 654; the planner should be guiding the PM as to what is needed for the environmental document.
Project Description and Scope of Work	Bullet #3 asks for identification of staging/stockpiling areas, detours and temporary access routes. Contractor "use areas" are not typically known at the time of project development/environmental clearance process. I suggest qualifying this concern by adding "if known" at the beginning of the bullet. Or install a check box asking if at the time of the 654 preparation, the staging, detours, and material sources were known.	Sometimes they are known and if they are, they should be included
	Bullet #5 asks for the number and location of where trees will be removed. This is a new level of detail that was not requested in the past. Why is this necessary to make a DCE/review determination? In some cases this information will require added analysis that will be subject to some variability, particularly as projects progress through final design. Also, is "tree" defined by some minimum size? If so, what is that size? If the need for this information is driven by MBTA or visual concerns, please let the practitioner use their qualitative judgement to address those types of concerns.	I do not believe this is a new requirement either. If known, tree removal has always been part of the project action, so as to identify habitat impacts, etc. DEPs have always assessed this.
Changes in Access or Access Control	Temporary Changes in Access and related questions about Changes in Traffic/Travel Patters: Aside from issues of closing road or planning for off-site detours, this section(s) is asking for details on construction related access changes, traffic control and detour impacts that typically will not be known at the stage of making a CE determination. In fact, much of this type of information will only be determined during construction. Assuming this line of questioning is to ferret out whether or not a project could result in "substantial" changes as defined by FHWA, and therefore have implications on a project's ability to quality under the PCE, why not simply ask y/n if the project will result in "substantial" changes per the implied definition (with a comment box to elaborate). Currently the 654 and its instructions (including the analysis sheet for construction) include redundant questions that can only be answered by guesswork (that will not reflect what will really happen in construction. These sections need to be simplified and refocused based on information that would be important to making a PCE determination or CE determination generally.	Access control information is needed to determine who will sign the document; change to access control will send it FHWA. In addition, I believe we have always attempted to answer these questions for the CE, and these were always checkboxes on the old 654. That being said, the focus on only substantial changes would leave out all discussion on things such as a minor traffic pattern shift. Not a FHWA-approval level issue but still something that ITD needs to address.
Maps and Photographs	Maps and photos. The insert maps box is only good for one map. Many projects have many locations and multiple maps are needed. The insert photos format also needs to be changed to allow photographs to be inserted along with descriptions referring to the photographs.	*Additional pages can be added once it is a pdf. Instructions give details on how to accomplish this.
	Once photos are uploaded, there is no way to add a caption unless you modify the photo in a different program and then upload that to the form, requiring further processing time.	*654 gives details on how to accomplish this. Create a separate photo page in word (as has always been done in the past) and add caption and text where necessary. Then when the document is saved as a pdf the page is inserted.
	Project figures were difficult to put into the form. The form requires a JPEG and it is challenging to convert an Adobe or Bluebeam figure into the image so that we can then put it into the form. Our IT department was able to do it, but it took a great deal of effort. Even after converting the file, the form didn't want to accept it.	*Instructions say to convert to jpeg and then insert. We have realized this doesn't work. Version 2 makes it clearer - save the entire document as a pdf then insert new pages of maps and photos.
	Having to add the photos rather than just inserting them in a word document adds steps so if that could be fixed, that would be great.	* Responses above on the fix for now. The new online version will simplify this process.
Environmental Summary	Environmental Summary: The 4 th statement implies that guidance for making a y/n determination can be referenced in the EPM. Such guidance should be sufficiently provided in the instructions (based on definitions, criteria and/or appropriate web links), or at least that should be the goal. The EPM should be a reference for those looking to make a deep dive into regulatory background and technical analysis and such, particularly for projects requiring technical reports, EAs and EISs.	As we discussed at the beginning of this process, the instructions tell you how to use the form, the EPM will be ITDs way of interpreting the regulations or requirements. The decision to delay was a group decision and the EPM is currently under review and revision.
	Environmental Summary – 6(f): The Section 6(f) list of properties should be hot linked to the instructions for ease of reference.	Link is in the instructions as a footnote.
	Environmental Summary – Prime and Unique Farmland, and Farmland of Statewide or Local Importance-Most of the road projects that do not require right-of-way or are sliver cuts, a Farmland Conversion Form (AD-1006) should not be required by the project. This is mostly a tracking tool for USDA and not sure there is a lot of value added or mitigation proposed so it seems a bit pointless. It is needed if there is a potential to divide/segment farmland, eliminate farm access or other bigger impacts but those are typically associated with a new alignment and not typically a Cat Ex. Can we eliminate or reduce the requirement to have USDA/ITD do the AD-1006?	Noted, and because the EPM is currently being drafted, this can be explored. ITD does not currently have an MOU with the NRCS to programmatically clear projects.
	Environmental Summary – HAZMAT: The question "Mitigation required?" would be more appropriately termed "Special Provisions" because we don't really mitigate HAZMAT issues in a regulatory sense; we pay contractor to file notifications, manage HAZMAT exposure and dispose accordingly via SPs or contractor notes when necessary.	When contamination is discovered, excavated, disposed of, etc. we are mitigating the issue.
	Environmental Summary – FAA: Provide method(s) or criteria for determining whether the project area is in an airspace. When notification is required, the 7460-1 form requires certain data that would be provided by the contractor which is why we utilize an SP that requires the contractor to provide the notice to FAA. That said, the notification date as required on the 654 will not be available at the time of the CE approval and should be deleted from the 654.	*Version 2 fixed. The need to provide detailed instruction on airspace has been identified and the next version will include instruction on airspace. Notification and concurrence date removed.
	Environmental Summary – Air Quality: The attainment area map link does not work. Provide more clarification in the instructions as to how to answer y/n to "PM – Not a Concern".	*Version 2 - this has been fixed. *Agreed. Clarification has been provided on the exemptions.
	Environmental Summary – Social, Economic, and Community Resources: Please specify further the phase "require right of acquisition (as defined in the PCE agreement)" in the instructions. What is the threshold for right of way acquisition whereby a social, economic or community resources review would be necessary. Numerous projects require right of way acquisition but not to any extent that would necessitate these types of review. More guidance is needed here.	The EPM is in review and further guidance will come. For now, the threshold is when a project involves ROW acquisition that affects the function of the primary use of the property or involves relocation or displacement. Per the instructions, the analysis sheet would be used to conduct a review if any of the bulleted items are part of the project action: change in access control or traffic patterns, ROW acquisition (per stipulation above) or closures/detours.
	Environmental Summary – Aquatic Resources: The Idaho Navigable Lakes & Rivers map link doesn't work. Please provide additional guidance in the instructions for answering y/n for "mitigation required" (i.e., applicable thresholds, agency policies, etc.).	*This link is fixed. Mitigation required is simply a Yes or No. This assists the reviewer and also provides a snapshot for those that want to just use the summary as an overview of the CE.

	Environmental Summary – Wild and Scenic River: How can a river be considered a 4(f) resource? How does this status get determined? Further specify the criteria for this determination.	See FHWA guidance (link in instructions).
	Environmental Summary – Biological: EFH Mapper Tool does not work. Why do we address EFH and how do we find out where the EFH is located.	*This mapper and other "protected resources app" have been added. Essential Fish are listed in the IPaC, then the mappers are used to identify where the project is in relation to EFH.
	Environmental Summary – Species of Greatest Conservation Need: Please provide the link to the IDFG Conservation Planning (IFWIS) website tool, or explain the process for requesting access. Please seek out IDFG recommendations for SGCN species conservation measures and address this topic on a state-wide programmatic basis. We have already discussed this topic with the IDFG reps and they have stated they would generally not recommend conservation measures within ITD RWs to avoid potential conflicts with highway operations. New habitat impacts from proposed projects may be worthy of coordination/SGCN consideration as well as state-wide programmatic-based conservation efforts, otherwise coordination with IDFG on project by project basis has shown to be mute to both agencies.	*HQ is currently working with IDFG on access, but for the time being, consultants are now able to get free information for ITD/LHTAC/ACHD projects. If IDFG do not recommend measures then note it. We have seen measures recommended for pollinators-different seed mix, and there have been discussions around the development of a state-wide list of conservation efforts.
	Environmental Summary – MBTA: This section implies that all projects involving migratory birds will require work restrictions between April & August and that determinations to the contrary will not be granted for reasons of contractor convenience. What about for reasons of project constructability? This “would be” mitigation requirement should be deleted from these instructions and reference should be made to an appropriately written standard specification that has gone through interdisciplinary ITD review, including by ITD management.	*This form was being developed along with changes to the specification. Those specification changes are now final. Changes made to V2 state the EP adds a commitment where necessary.
	Environmental Summary – Bald & Golden Eagles: Please define the term “near” in this section’s context. Also please provide a data link in the instructions. Also, why do we only have a Midwest reference to this topic?	*This has been updated and the Midwest reference removed.
	Environmental Summary - FAA Facilities and/or Airspace FAA notice criteria tool – add tips on filling out form into instructions? (e.g., list height from pavement elevation not actual elevation, etc.)	Did not want to duplicate what is already provided on the link in the instructions.
Coordination and Outreach	All Cat Ex projects are now required to provide documentation and review of the Public Outreach Planner (POP) including providing a copy of the POP worksheet. District Public Information Officers, PM’s and SEP’s do not have any idea what this worksheet is and that it is a requirement for environmental project documentation.	*Information is included in the instructions. There is no requirement that is any different than what has always been, which is that the NEPA document should reflect the public involvement activities that have occurred. Most of the time, the CE will just document that outreach was not needed. Version 2 revision: “POP not accessed?” is a checkbox and a blank text box provided. User can state "N/A". Please share back with the District Public Information Officers that the ITD Guide to Public Involvement for Programs, Planning & Projects and the POP worksheet are located on the Office of Communication page.
	Public Coordination & Outreach: Why is the POP level important to this checklist?	POP level determines the level of outreach that is needed. The Guide to Public Involvement and the POP were developed for the agency for use during project development; the guide indicates that these tools are used by the Districts to accurately identify the need for public involvement.
	In general the Public information requests are problematic. The fire and health districts that we are required to contact do not typically answer any questions and typically see the calls as bothersome. It should only be required if there are potential, obvious or known/recorded sites.	These were included because if there are closures or detours they typically want to know to be able to plan if an emergency occurs.
Hazardous Materials	The Hazardous materials evaluation process (using Terradex Facility Mapper) has changed and the process is not clear concerning why for Cat Ex projects depth to the water table and groundwater flow direction is imperative. Training is needed on the use of the Terradex tool and discussion is needed on how far to search around a project looking for well data, how close is close enough, and where to find ground water flow directions and why this information is important for most Cat Ex projects?	*Instructions have been modified to hopefully add clarity. A 1-mile radius around the project is requested. IDWR link has been added to find the groundwater depth. Planners, consultants, etc, can contact SMEs if they are having difficulty navigating this or any processes.
	Hazardous Material Worksheet: Instead of specifically asking for Ground Water depth and flow direction...simply ask if there is potential for potential adjacent pollutant plumes to migrate into the RW and will the work have the potential to encounter contamination.	It was determined that by asking for groundwater depth, this would help in the justification of interaction or not. This step is now only required if topography question does not satisfactorily complete the process.
	What is the relevance of paint striping obliteration to RCRA metals? Does striping paint contain RCRA metals and does ITD become a generator if and when striping is obliterated? And under what circumstances does striping get obliterated?	Striping paint has been known to contain lead and other RCRA metals. Is now covered in the specifications.
	The hazardous materials data and level of effort should be “appropriately sized” for the project. If there is a suspected or known site it makes sense to interview agencies and fire districts and look into groundwater data but if there is no potential site or specific question to ask them it is not useful to generally ask agencies if there are any hazardous materials concerns in a corridor. If there are suspected sites that require further investigation and investigation of groundwater flows, perhaps a Phase 1 or appropriately sized investigation would be the next step beyond an administrative review or consideration of acceptable/standard language for dealing with these issues during construction.	*Changes have been made to be more in line with the 649 with some initial questions. Contacting fire districts is not required.
	Hazardous Materials administrative review sheet: • Seems to be some Terradex vs Enviromapper data discrepancies. If neither are comprehensive, then why terradex over enviromapper? Should we be checking both?	No, it was determined that Terradex provided the information that we needed for CEs.
	• When is the ‘site information’ required, given depth to water table and ground water flow direction may not be readily available for a given site, or the entirety of a project footprint. Do we need to include instructions on how/where/when to research this? And, if required, should we be asking for geotechnical work to provide that information?	Information on where to get groundwater levels is contained in the instructions. Geotechnical should not be required for CE level work. If this information is available it can be used to help with the justification.
	• Other hazardous materials box – when is asbestos and RCRA metals testing required? Items listed on right hand side makes it look like those are required for the left hand actions – probably would be better to have them just listed below in their own rows (example, paint striping and RCRA metal testing – do we need to test removed paint striping for RCRA metals?).	Instructions cover when it is needed. If you check the yes boxes, then testing is needed either before the contract is let and include the information here or include it for the contractor.
	The Hazmat sheet is a little confusing. The pdf instructions could be more specific as to where to look for certain information. For instance there are some new boxes compared to the old 652.	*The instructions have been modified to hopefully clarify what information is needed and from where to find it.
	• Where do we find depth to water table Groundwater flow direction, and topography?	*Link has been added.
	• Are agency contacts really necessary? The local fire departments may be worth contacting but every time I call DEQ or EPA they just direct me to do a PRR or FOIA and generally seem annoyed that I am even calling them. I have yet to receive any valuable information from them.	Fire department is not a requirement. After reviewing the Terradex data, if there are sites that can be of concern, you should be requesting records from DEQ.
	• Should an asbestos survey be done prior to 654 approval? It is not typically done until further in design or construction. Maybe that could be added to mitigation? Same with RCRA testing.	It is better to know the information going into the contracting process, but doing this testing is at the discretion of the District.

Visual Resources and Aesthetics & Analysis Sheet	Visual Resources and Aesthetics is a confusing topic with little explanation on the process and evaluation needed to complete this part of the form. There are issues in this topic which will cost ITD potentially big dollars. There is a list: Does the project involve any of the following, including several items that are confusing about what they mean including: Cut of Fill Slopes > 10-ft difference in elevation; removal of vegetative screen; known concerns with visual aspects such as aesthetics, light, glare or night sky? There is no direction on these concepts and how any of them matter on most of our Cat Ex projects but we are still required to provide this documentation, which is new. Almost all projects remove some form of vegetation, what qualifies as a vegetative screen, there is no definition of that term. Another large issue under this topic is a short discussion on what color to stain concrete of structures on federal lands as an example of mitigation measures for visual impacts. ITD may be required to color all concrete poured anywhere our roads cross federal lands, which could be a big and laborious expense.	The list was compiled as a group and the requirement is not new, it just was never completed or enforced. Based on the FHWA training last year, we should be doing much more than this form is even proposing. The EPM is in development; further guidance will be provided when the manual is completed.
	Instructions for Visual resources states " If yes to any of the above areas, plans or resources existing in the project area, check "Yes" and go to the Visual Resources Analysis Sheet (unless addressed by another resource; in that case, go to that analysis sheet)." --- it turns out that even though the analysis was covered under the "Wild and scenic rivers, agency-designated or managed scenic rivers " , the information also needed to be repeated under the Visual Resources Analysis sheet. This is simple to repeat but would be faster if the needed documentation in both places to get ITD's signature was clear to start with.	I think this is something that we might be able to accomplish with the new online form.
	Visual Resources Instructions – the list under “does the project involve any of the following” is panic- inducing due to no indication of what the expected course of action is for ‘yes’ to any of those situations. Need to differentiate between ‘hard’ guidance or requirements (ex. wild & scenic rivers, DOI mgmt. plans, etc.) vs potentially controversial (big cut/fill, light glare, public comment)	The list was compiled as a group. If it is included in the form, it needs to be addressed if there is the potential to affect.
Biological Resources Analysis Sheet	Under the topic Biological Resources, species of greatest conservation need (SGCN) is another big topic since these species are not “listed” species under the Endangered Species Act (ESA) and under the jurisdiction of the USFWS or NMFS. Under the SGCN umbrella ITD is required to document Tier 1 listed species, which are species identified in the Idaho State Wildlife Action Plan as at risk for declining populations. This process now requires ITD to ask the Idaho Department of Fish and Game (IDFG) for recommendations on specific conservation measures that should be included in the <i>Environmental and Engineering Commitments/Mitigation Measures Sheet</i> . ITD may be required to follow IDFG's mitigation measures recommendations for SGCN species that have no federal requirement. Here are a few of the species on the IDFG Tier 1 list:	Should is the key word in the quote. It is up to the District to decide if they can accommodate the IDFG suggested requirements.
	A Click Beetle, Morrison’s Bumble Bee, Western Bumble Bee, Suckley’s Cuckoo Bumble Bee, Greater Sage-Grouse, Burbot, Southern Idaho Ground Squirrel, and many, many, more.	
	Under “Tier 1 Species” – since the same bumble bees show across the entire state, why not just make them part of the 654 form so we don’t have to spell it out each time?	This is something that we have broached with IDFG, but have not had a chance to fully address.
	Consultants don’t have access to the work authority numbers in OTIS and a common comment is the inconsistency with OTIS. Can consultants get access or how necessary is it to have WA# that are from OTIS?	That is outside of the scope of ENV. Isn't this a piece of information that the consultant gets from the District when a contract is let?
	Not all of the listed species are on the drop down menus on the biological worksheet. Clarify if you want the document titles or the file names in the different boxes for supporting documents.	*Information has been added to the drop down list on the Essential Fish. If other species are missing, it would be helpful to know which ones. Also a blank text box has been added in order to add species if necessary.
	I think the IFWIS search for Tier 1 species and the requirement to consult with IDFG individually on each project is silly and ineffective since we rarely incorporate their suggestions so it appears we are delaying projects and wasting the agencies’ time and this probably results in mistrust. Instead, we should come up with a list of the species and recommendations that ITD can typically live with, consult with IDFG on them then incorporate them as possible during project.	Most recommendations to date have been for the addition of pollinator species seed mix. To date, I have not been made aware of any project delays due to this requirement.
	Can consultants get access to the conservation tool as the IFWIS data can be overwhelming? The conservation tool is so much more streamlined and you can attach a useful list to the EE/PW if needed.	Right now the consultants have to go through the IFWIS process. We are actively working with IDFG on the tool and are trying to get access for consultants in the future.
Migratory Birds	Another issue under this topic is migratory birds. Under the migratory bird umbrella ITD may be required to restrict construction activities during the bird nesting season (April to August) such as ground disturbance actions (clearing, grubbing, grading, excavation), bridge removal actions, mowing of grass or removal of trees. Which means, projects might be better advertised in the late summer or fall so contactors could start these activities before they are halted during the April to August season. Again, mitigation measures for migratory birds will be included in the <i>Environmental and Engineering Commitments/Mitigation Measures Sheet</i> .	
	Under Migratory Birds – Is the following a true statement “Migratory bird breeding and nesting season generally occurs between April and August. The contractor shall avoid activities that have the potential to impact migratory birds during these times. If avoidance is determined to be infeasible, the contractor shall coordinate with the Engineer, District Environmental Planner and USFWS to minimize and/or mitigate impacts to migratory birds. Avoidance infeasibility determinations will not be allowed strictly for contractor convenience.” As a SEP, I don’t want the contractor contacting the USFWS. This statement should be replaced by one that refers to the ITD spec book for MBTA.	*Language has been revised since the 2020 specs have been revised to include appropriate language for MBTA.
Construction Related Impacts Analysis Sheet	Construction-Related Impacts Analysis Sheet – How can this ever be marked no???? Are there ITD construction jobs that do not require “traffic control measures”? When are the “traffic control measures” known before the Final Design review? As the instructions state, “Traffic Control Measures - Briefly describe construction-related traffic impacts, and traffic control measures required to minimize impacts for construction.” How can we describe these accurately?	I believe this is meant to be a snapshot, to capture what we know at the time of approval. ITD has always done this, this is not a new requirement.
Permitting Analysis Sheet	Under “Permitting Analysis Sheet” -- Since an IDFG permit is needed if Fish will be handled, why not add that to the list for a check box?	*Added to version 2.