# Standard Operating Procedure 23-2

*Highway Development*

## Basic Information

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|---|---|---|---|
| SOP Title: | Environmental Document Submissions | Date | 11/3/2023 |
| Preparer: | Wendy Terlizzi | Preparer's Title | Environmental Manager |
| Short Description of Procedure: | Submittal requirements and procedures for environmental documents tied to environmental evaluations and re-evaluations, including Planning and Environmental Linage (PEL) studies. | | |

## Related Document Links

| Title of Document | Location |
|---|---|
| Programmatic Agreement Approval of Actions Classified as Categorical Exclusions for Federal-Aid Highway Projects | ITD Environmental Website |
| NEPA Re-evaluations and Environmental Commitments | |
| Environmental Document Naming Conventions | ITD Environmental Website |

## Relevant Idaho Code

| Title of Document | Location |
|---|---|
| | |

## SUPERSCEDES 20-1

### Submit Documents

**Consultants/Contractors:**
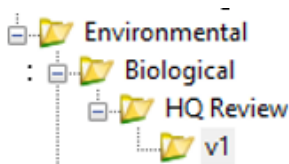
a. Complete an internal QC review of a document prepared by qualified staff.
b. Unless otherwise approved, submit final documents. A complete document package includes (or references) final technical reports and approvals. [Requests for review of incomplete documents may be approved at the discretion of the reviewer and based on available staff resources.]
c. Submit ITD projects or ITD local projects to the District Project Manager or District Environmental Planner (DEP). Consult with the Project Manager to determine the District preference. Submit non-ITD (LHTAC or ACHD) local projects to the LHTAC/ACHD Project Manager.
d. Communicate the desired action, anticipated response time, and any requests for expedited turnaround. [Approval of requests for expedited turnaround is at the discretion of the reviewer and based on available staff resources.] The anticipated response time should be based on early discussions with the reviewer, used to develop the project schedule.
e. <u>Format</u>: electronic copy (.docx or .pdf). Use .docx when the use of track changes is beneficial to the review cycle. A saved .pdf is required to optimize size and preserve graphic quality. Update revised documents with a version control method (date).
f. <u>Naming</u>: Utilize the NEPA naming convention when saving and naming documents for ProjectWise.
g. **DO NOT make direct transmittals to FHWA, SHPO, USACE, NMFS or USFWS**.
h. Delineation reports and/or 404 permit applications where collection of data is part of the scope of work must include shapefiles/data set as a deliverable to be saved to ProjectWise.

### Transmit to HQ Environmental

**NEPA** and related
a. All documents, including permit applications and support documents, should be considered ready for approval with quality control complete and all attachments and signatures (when appropriate) included. Any requests for Draft review must receive prior approval by the HEP.
b. <u>Naming</u>: Utilize the NEPA naming convention when saving and naming documents for ProjectWise.
c. <u>Format</u>: electronic copy (.docx or .pdf). Use .docx when the use of track changes is beneficial to the review cycle. A saved .pdf is required to optimize size and preserve graphic quality. Electronic signatures (<u>digital certificate or</u> <u>stamps are acceptable)</u> are <u>required</u>. Update revised documents with a version control method (date or other ID).
d. <u>Submittal</u>: Documents should be placed within the ProjectWise "HQ Review" folder located under its respective resource folder. (Create the appropriate resource subfolder if one does not already exist.)

Environmental Example:                                      PEL Example:
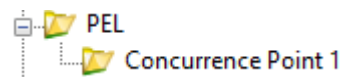
Support documents should be linked using ProjectWise "sets." Sets can be created in the HQ Review folder to direct the reviewer to all support documents regardless of their location. To create sets:

- Navigate to the appropriate HQ Review folder
- Select "Sets" under the "Document" tab
- Create a unique Set name using key number, name and date. Example: "12345 Support Documents 01012020".
- Drag and drop all support documents from other locations into the Set dialog box. This creates a link to the original document as one "set".

e. ITD/LHTAC/ACHD – Submit the request by the DEP via email to NEPA@itd.idaho.gov (copy the Headquarters Environmental Planner [HEP]). Convey to the HEP any specific instructions or information needed to process the request.

**Cultural Resource**
- ITD/LHTAC-Submit via email to Cultural@itd.idaho.gov

Requests for source or waste site clearances during construction need to go through the DEP.

**<u>Reviewer responsibilities</u>**

Immediately <u>notify the sender if response time expectations cannot be met</u> and communicate the modified schedule.

- If expectations cannot be met due to a change in the volume of the document since the time of the initial project schedule.
- If expectations cannot be met due to workload, projects will be given priority based on: prior communication of a well thought out schedule for environmental tasks.

For schedule efficiency, <u>complete a cursory "completeness" review</u> ASAP within 5 working days and return to sender if obviously incomplete. An incomplete document will result in an incomplete review.

Incomplete includes:

- Missing parts (including response to comments)
- Missing precursor approvals
- Multiple errors that indicate a lack of QC review

<u>Document comments</u> using one of the following methods, as mutually agreed:
- HEP will not revise documents unless extremely minor in nature and agreed upon by the DEP.
- Convey clear and concise comments <u>in writing</u> (in order of preference).
- Using BlueBeam
- Using.pdf comment capabilities
- Using .docx track changes

Comments and approvals will be sent back to the agency personnel (ITD, LHTAC, ACHD). If consultants are copied, they will be removed. It is up to the District or Local Agency to notify the consultant of what changes they wish to see.

Requests by a Project Manager to receive a copy of the comments or copies of transmittals will be honored.

## Review Cycles

Standard document review cycle.
1. Review by district/LHTAC.
2. Revise based on district review. Resubmit to District/LHTAC/ACHD for a response to comments check. Transmit to HQ.
3. Review by HEP.
4. Revise based on HEP review. Resubmit to District/LHATC/ACHD to transmit to HQ for a response to comments check prior to transmittal to ESM or FHWA.
5. Review by ESM/FHWA (or other relevant agency).

The following alternate review cycles may be done upon request, at the discretion of the reviewers.

Sequential review cycle. Used for documents that result in <u>limited</u> minor comments. Make request with submittal. Example: Review by district. District forwards document with district comments to HQ without revisions. Ditto for FHWA review.

Concurrent review. Used for second review (back check) cycles or critical projects. There is an expectation that the sender has addressed prior comments. Make request prior to submittal, preferably early when initiating the project schedule or modifying a schedule.

## Turnaround Times

**Report Review Allowance (not counting holidays)**

| | |
|---|---|
| District Environmental Planner* | 14 calendar days (CE) |
| | 21 calendar days (EA) |
| | 28 calendar days (EIS) |
| Headquarters* | 14 calendar days |
| FHWA* | 14 calendar days |
| State Historic Preservation Office | 30 calendar days |
| US Army Corps of Engineers | 60-90 calendar days |
| Permit applications | 10 calendar day completion review 35 calendar day application complete |
| Delineation reports | No set timeframe |
| USFWS | 90 calendar days |
| NMFS | 90 calendar days |

*Headquarters and FHWA timeframes mimic the District Environmental Planner.

## Second Bites of the Apple

This phrase originates from legal jargon. For our purposes, it refers to taking a second shot and something that one should have brought up the first time. While "second bites" are discouraged, if an error is found on a "second bite", the preparer is responsible to correct the error.

### Note on Quality
The consultant contract outlines the prime consultant responsible for overall quality, including error and omissions. The distribution of environmental tasks between the prime and sub-consultant varies widely

by project. Environmental tasks are often completed by a sub-consultant. The Prime shall ensure all staff is working within their area of expertise.

**Note to Project Managers**
The successful PM has a cursory understanding of environmental issues which affect the project scope, schedule, budget, and risk.
- Engage in early communication with the environmental practitioner(s) on the Project Team, and staff at HQ Environmental, to set a reasoned baseline.
- Engage in continued communication with the environmental practitioner(s) to manage change and proactively mitigate risks to the project scope, schedule and budget.

**<u>Re-Evaluations</u> Changes:**
1. The re-evaluation[1] is prepared by the District and submitted by the DEP to the HEP for review.
2. The re-evaluation is then submitted to the ESM for review and approval.
3. A copy of the re-evaluation and the approval are placed in ProjectWise.

**No Change:**
The DEP sends an email to the Project Manager stating that there are no changes to the current approved environmental document is still valid. The HEP are copied on the email so that OTIS can be updated. The email is then saved in the project file on ProjectWise before ROW and/or construction funds can be obligated.

**IPAC list:**
If the IPAC list is 90 days or older, a new list needs to be requested and checked for changes. If it has changed, the environmental document needs to be updated. Save the new list to ProjectWise folder.

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[1] This is for CE re-evaluations. A consultant typically prepares EA and EIS re-evaluations.