Summary of Caltrans First Self-Assessment Under the Surface Transportation Project Delivery Pilot Program, December 2007

Introduction

Section 8.2.6 of the Caltrans/ Federal Highway Administration (FHWA) Surface Transportation Project Delivery Pilot Program (Pilot Program) Memorandum of Understanding (MOU) requires Caltrans to perform a formal process review or "self-assessment" of its quality control and quality assurance (QC&QA) activities related to its project decisions, environmental analysis, project file documentation, checks for errors and omissions, and legal sufficiency reviews. As part of these self-assessments, Caltrans is required to determine whether its QC&QA processes are working as intended, identify areas needing improvement, and take corrective actions necessary to address areas needing improvement. These self-assessments are to be conducted every six months for the first two years of the Pilot Program and no less than annually thereafter. The results of the self-assessment are to be summarized in a report and submitted to FHWA at least one month prior to the date of the scheduled FHWA audit of the Pilot Program. This report summarizes the findings of Caltrans first self-assessment preceding FHWA's first audit, to be conducted from January 29-February 1, 2008.

Scope of the Self-Assessment

The first self-assessment includes the following components:

- A program-level review to determine if the statewide foundations for Pilot Program success, including new program-wide tools, staff training, and additional staff resources, are in place and working effectively. The program-level review also included an assessment of Caltrans' progress toward implementing the commitments it made in its Pilot Program application.
- A District/Region review to assess the effectiveness of new policies, procedures, and tools in meeting Pilot Program requirements, including staff adherence to policies, procedures and tools. This review addressed the following general areas:
  - Are Caltrans' new QC&QA policies, procedures, and tools working as intended?
  - Are Caltrans' District environmental staff, local agency partners, and consultants appropriately implementing new QC&QA procedures and using new QC&QA tools?
- An evaluation of Caltrans' progress toward meeting the performance measures identified in the Pilot Program MOU.
- Identification of corrective actions, where the reviews indicated that program-wide tools and resources and District/Region implementation of new procedures and tools are not providing optimal results. Future self-assessments will assess the success of these corrective actions.

- A statement by the Caltrans Chief of the Division of Environmental Analysis concerning whether the QC&QA processes are ensuring that the responsibilities Caltrans has assumed under Part 3 of the Pilot Program MOU are being carried out in accordance with the MOU and all applicable federal laws and policies.

This first self-assessment is based on only five months of QC&QA activities under the Pilot Program, and therefore, an extremely small sample of approvals and decisions made by Caltrans. On all but five of the projects for which Caltrans has made decisions under the Pilot Program, FHWA had some role in reviewing the environmental documents. Due to the limited time that the Pilot Program has been in effect and the transition that these ongoing projects have undergone from pre-Pilot Program to Pilot Program requirements, this self-assessment focuses primarily on whether the needed tools and procedures are in place to ensure Caltrans' success under the Pilot Program. Future self-assessments will address more closely whether these tools and procedures are working as intended.

Program-Level Review

The program-level review focused on the following:

- Content review of Chapter 38, "NEPA Delegation", of Caltrans Standard Environmental Reference (SER);
- Summary of training that Caltrans has provided or made available to its staff, local agency partners, and other interested parties related to its responsibilities under the Pilot Program;
- Summary of additional staff resources that have been provided to implement the Pilot Program; and
- An assessment of Caltrans' progress to date on meeting the commitments it made under the Pilot Program application.

These items are addressed below.

Content Review of the Standard Environmental Reference

Caltrans Standard Environmental Reference (SER) is Caltrans' primary tool for disseminating guidance on the content and procedural requirements of environmental documents. Since initiation of the Pilot Program, Chapter 38, on "NEPA Delegation", was added to the SER. This chapter discusses new policies, procedures, and requirements under the Pilot Program.

As part of this self-assessment, three District/Region senior environmental practitioners conducted an independent evaluation of Chapter 38 to assess its comprehensiveness on Pilot Program policies and procedures, usability, organization, readability, and internal consistency. The reviewers generally found Chapter 38 to be comprehensive, well written, organized, technically accurate, and easy to use. They made a few minor editorial suggestions and recommended that a summary of links and acronyms be provided at the beginning of the chapter. Changes will be made to Chapter 38 in response to their suggestions within the next two months.

Training Summary

The goal of Caltrans training program related to Pilot Program requirements is to ensure that District/Region staff with Pilot Program responsibilities are sufficiently prepared to implement the Pilot Program successfully across California. Caltrans provides Pilot Program training on both a formal and informal basis to its own staff, local and regional agency partners, consultants preparing environmental documents for Caltrans, and other interested entities. Formal training is typically initiated by Caltrans Headquarters Division of Environmental Analysis and tracked via the Caltrans Learning Management System. Training provided to date in support of the Pilot Program includes NEPA Delegation workshops, NEPA compliance training, categorical exclusion workshop, FHWA audit training, and legal sufficiency training. The NEPA Delegation Manager, Division of Environmental Analysis Division Chief, Headquarters Environmental Coordinators, Headquarters Local Assistance NEPA Delegation Coordinator, District Local Assistance NEPA Delegation Coordinators, and District senior staff and managers also provide formal and informal presentations to environmental, design and project management staff, local and regional agency partners, and consultants on Pilot Program requirements on an as-requested and as-needed basis. These include such venues as monthly teleconferences; presentations to internal staff, local and regional agencies, and consultants; meet and greets; briefings at Project Development Team (PDT) meetings; and one-on-one meetings. Table 1 provides a summary of training provided to date related to Pilot Program requirements.

Additional Staff Resources

Caltrans Headquarters Division of Environmental Analysis established two new positions, the NEPA Delegation Manager and the Statewide Audit Coordinator, to implement the Pilot Program. Headquarters Division of Local Assistance also added six new staff personnel-years including a supervising environmental planner position (the statewide Local Assistance NEPA Delegation Coordinator) and five new District Local Assistance senior-level staff for Pilot Program coordination. The Districts are using the Capital Outlay Support (COS) program work plan process to identify any additional resources needed for State Highway System (SHS) projects under the Pilot Program.

Progress in Meeting Pilot Program Application Commitments

Caltrans evaluated the progress it has made in meeting commitments specified in the Pilot Program application and has concluded that it has met or is in the process of meeting all of them. Caltrans has not yet had to implement some commitments (such as those related to implementing a formal conflict resolution process and determining projects that require prior concurrence). However, procedures and guidance have been developed for these commitments, and they will be implemented as the need arises.

Formal guidance is currently being developed to meet the commitments described below:

- To expand the QC review of technical studies prepared under Section 7 of the federal Endangered Species Act, Caltrans is developing QC guidance for Section 7 documentation that will be posted on Caltrans SER. This guidance will document the minimum requirements for Caltrans biologists who review and approve Section 7 documentation. It will also outline an internal QC review process for Section 7 documents.

- To meet its commitment related to Section 7 and Essential Fish Habitat training, Caltrans Headquarters has commenced discussions with the U.S. Fish and Wildlife Service and National Marine Fisheries Service to identify available training opportunities and to collaborate with these agencies on augmenting Caltrans' existing training program for biologists. To date, Caltrans biologists have attended National Conservation Training Center training on writing Biological Assessments. FHWA-presented Biological Assessment training is scheduled for January 2008 and again later in 2008.
- To meet its commitment to host a statewide meeting for District Local Assistance Engineers and Local Assistance environmental staff to discuss Pilot Program requirements, Caltrans has conducted one statewide meeting with Local Assistance environmental staff for general Pilot Program awareness and specific training on LP 2000, the Local Assistance data tracking tool. Caltrans used existing regularly scheduled statewide meetings and training for District Local Assistance Engineers and staff to discuss Pilot Program requirements. Caltrans will continue to use these venues to provide updated information as the Pilot Program progresses. In addition, Caltrans is planning to hold a statewide off-site meeting with Headquarters and District/Region Local Assistance environmental staff in the spring of 2008.

District Review

The District/Region review assessed whether Caltrans' new policies, procedures, and tools for preparing environmental documents are working as intended. Specifically, the following areas were reviewed as part of the District/Region file reviews and staff interviews:

- Caltrans environmental staff, local agency staff, and consultant awareness of procedural changes and new tools under the Pilot Program;
- Proper use of environmental document QA&QC preparation and review tools by Caltrans environmental staff, local agency staff, and consultants, including the following:
  - Environmental document annotated outlines,
  - Environmental Document Quality Control Review Certification Form, including completion of each required QC review;
  - Environmental Document Preparation and Review Tool;
- Effectiveness of the environmental document QC review process;
- Proper use of documentation tools for categorically excluded projects by Caltrans staff, local agency staff, and consultants;
- Proper use of environmental milestone tracking tools by Caltrans staff;
- Timeliness of environmental decisions;
- Staff awareness of available training;
- Proper use of environmental record keeping system (Uniform File System [UFS] for Environmental Analysis) by Caltrans staff;

- Procedures for document management, project file retention, project file access, and transferring project files to other Caltrans environmental staff; and
- Progress in meeting the Pilot Program performance metrics.

Process for Self-Assessment and Areas Reviewed

Visits were made to those eight Caltrans Districts that, between July 1 and October 1, 2007, completed NEPA documents and/or made NEPA decisions under the Pilot Program. At each District, project files were reviewed based on a checklist of identified parameters. A total of 32 project files were reviewed. Caltrans completed NEPA documents and/or made NEPA decisions on 12 of these projects (Districts 8 and 12 jointly sponsored one of the 12 projects.). FHWA was involved in environmental document review (ranging from reviewing portions of the environmental document to reviewing and commenting on the entire administrative draft environmental document) on seven of these 12 documents. [For two Findings of No Significant Impact (FONSI), FHWA was involved in reviewing the environmental assessments, but Caltrans independently approved the FONSIs; these two approvals were counted as independent decisions made by Caltrans.] Those projects that only had a Notice of Intent issued were not reviewed. The remaining 20 projects, without completed NEPA documents, were randomly selected for a more limited review of the project files.

During the District visits, 36 Caltrans environmental staff members were also interviewed. These staff worked on the reviewed projects with completed NEPA documents or supervised staff that worked on these documents. Since none of the projects with completed NEPA documents were Local Assistance projects (local agency projects off the SHS using Federal aid funds), an additional 5 Local Assistance staff were interviewed to gain an understanding of the effectiveness of Pilot Program procedures for Local Assistance projects. Information was obtained from staff members through a series of set questions, as well as through open discussions.

Findings

The results of the District project file reviews and staff interviews are summarized below.

Awareness of New Procedures and Tools

District staff are generally aware of the Pilot Program's new procedures and tools, including the expanded environmental document QC review procedures, updated environmental document annotated outlines, new environmental document QC certification form, and the new environmental document preparation and review tool. District staff have been made aware of these new procedures and tools through a variety of formal and informal approaches including updates to Caltrans SER; policy memoranda and "tool kits" distributed by Caltrans Headquarters; active presence of Headquarters Environmental Coordinators in the Districts; District/Region staff attendance at the NEPA Delegation workshops and NEPA Compliance training sessions; monthly NEPA delegation teleconferences; and informal sharing of information between Caltrans staff. District staff are also reaching out to local agency partners and consultants to make them aware of new Pilot Program procedures and tools through sharing of information at project development team (PDT) meetings; presentations on Pilot Program

requirements at public agency and professional organization meetings; and outreach to local agencies and the District Local Assistance Engineers by the new Headquarters NEPA Delegation Local Assistance Coordinator and new District NEPA Delegation Local Assistance Coordinators.

Proper Implementation of New Procedures and Tools

The new environmental document preparation and review tool was fully completed for seven of the 12 completed environmental documents. FHWA's draft environmental document checklist (used prior to the initiation of the Pilot Program) was fully completed for two documents, since they were completed prior to initiation of the Pilot Program. The new checklist was partially completed for two environmental documents, and not completed at all for one document.

The QC certification form was fully completed for four environmental documents and nearly fully completed for another six documents. The most common missing signatures on the nearly completed forms were the NEPA QC reviewer, environmental document preparer, and/or Environmental Branch Chief. One nearly completed form lacked a peer reviewer signature, and two lacked some technical specialist certification signatures. These missing signatures may be due to the following:

- Four of the six documents were for projects in transition between pre-Pilot Program and Pilot Program requirements. For two projects, in addition to partially completing the new Pilot Program certification forms, Caltrans' "pre-Pilot Program" environmental document QC review certification forms were also completed because the reviews of these documents commenced before the Pilot Program began. A supervisor and/or Environmental Branch Chief signature(s) certification appeared on the "old" forms for these two projects. On the other two projects, FHWA had conducted some level of review of the administrative draft environmental document prior to initiation of the Pilot Program. Under the "pre-Pilot Program" process, FHWA review would occur after completion of the Caltrans QC process.
- The format of the Pilot Program certification form may have resulted in some confusion over the need for the NEPA QC Reviewer signature. A couple of interviewed Caltrans staff indicated that they understood that the NEPA QC reviewer signature was needed only for final environmental documents since the "Final Environmental Document only" certification for public review comments appears immediately above the NEPA QC Reviewer signature line.

Two of the 12 environmental documents had no certification forms. For one of these projects, FHWA had reviewed and commented on the administrative draft environmental document.

Two of the 12 projects with approved environmental decisions were draft EISs. Based on the file review and interviews for these two projects, both projects followed the required Pilot Program QC procedures for EISs in terms of required reviews being conducted, and required certifications obtained. None of the 12 projects involved Section 6005 Categorical Exclusions (CEs), and therefore proper use of the documentation tools for CEs could not be checked.

Interviewed staff indicated that the environmental document QC review process, including the review checklist and QC certification forms, is effective in producing quality environmental

documents that meet federal requirements and standards. The spring 2008 self-assessment will include interviews with the District NEPA QC reviewers and Headquarters Environmental Coordinators to gather their views on the effectiveness of the environmental document QC process. The spring self-assessment will also be more comprehensive, as it will involve the review of a greater number of environmental documents and decisions by Caltrans under the Pilot Program.

Proper Use of Environmental Milestone Tracking Tools

Dates found in project files related to the environmental document QC process and environmental approvals generally corresponded with tracking spreadsheet dates provided by the Districts to Headquarters for use in preparing the Section 6005 Quarterly Report. Minor data issues (such as problems in transferring data from the Local Assistance tracking data base, LP2000, to the tracking spreadsheet; clerical data entry errors; and missing data) that were encountered during preparation of the initial Section 6005 Quarterly Report were addressed and resolved quickly leading to accurate environmental milestone data.

Proper Use of Environmental Record Keeping System

The majority of the project files reviewed were consistent with the UFS requirements. Three of the 19 project files that were reviewed for consistency with the UFS did not have organization that allowed easy retrieval of documentation and did not follow the UFS. The remaining reviewed projects contained the required files.

Timeliness of Environmental Decisions

For the report to the California legislature pursuant to Section 821.1 of the California Streets and Highways Code, Caltrans evaluated the environmental review timeframes for the last 35 environmental assessment and environmental impact statement (EIS) projects reviewed and approved by FHWA immediately prior to enactment of the Pilot Program waiver of sovereign immunity on May 19, 2006. The environmental timeframes for these 35 projects were compared with five projects for which Caltrans has independently made environmental approvals as the federal lead agency, without FHWA involvement, between July 1 and October 1, 2007. This comparative analysis showed the following:

- Since initiation of the Pilot Program, a 59% time savings has been achieved for review of draft environmental documents. The three draft environmental documents independently reviewed by Caltrans were approved in a median time of 2.5 months, as compared to 6.1 months prior to the Pilot Program.
- A 71% time savings has been achieved for review of final environmental documents. The two final environmental documents independently reviewed by Caltrans were approved in a median time of 0.7 months, as compared to 2.4 months prior to the Pilot Program.

Staff Awareness of Available Training

Based on the District interviews, staff seemed to be aware of available training opportunities. Most staff felt that they were receiving the training they needed. A couple of staff members indicated that workload can be a deterrent to attending available training.

Procedures for File Management and Retention

Regarding document management procedures, the supervising seniors who were interviewed in

each of the Districts indicated that District staff are required to use the UFS. Each District has its own procedures for project file management and storage. Most Districts centrally file hard copies of all project files after the project is constructed (including downloads of important electronic files and email). The seniors in each District typically act as back-up project file "owners" in the event of extended absences by the project generalist.

The supervising seniors were asked how long environmental records are retained. Some answered at least 3 years, and others answered, "as long as needed". No one specifically mentioned the records retention requirements of the Pilot Program MOU section 8.3.

Progress in Meeting Pilot Program Performance Metrics

This self-assessment also evaluated progress toward meeting the performance measures identified in section 10.2 of the Pilot Program MOU. Attachment 1 presents each performance measure identified in the MOU, components and desired outcomes of the measures, tools for measuring performance, and the performance metrics. For each component of these performance measures, progress toward meeting the associated performance measure metrics is summarized below:

Compliance with NEPA and Other Federal Laws and Regulations

Documented compliance with the environmental procedures and processes set forth in the Pilot Program MOU is measured by the following:

- **Percent of self-assessment reports submitted to FHWA:** It is too early to measure this metric, but it will be addressed in future self-assessments.
- **Percent of identified corrective actions that are implemented:** It is too early to measure this metric, but it will be addressed in the spring self-assessment.

Documented compliance with the requirements of federal laws and requirements is measured by:

- **Percent of projects with completed environmental document preparation and review tool in file**: This tool is a checklist documenting that required compliance documents have been prepared for each project under applicable federal environmental laws. As noted above, 9 of the 12 (75%) environmental documents reviewed had completed checklists, two (17%) had partially completed checklists, and one (8%) had no checklist.
- **Percent of projects with completed QC certification forms in files:** These forms certify that project environmental documents meet all federal laws and regulations. As noted above, four of the 12 (33%) environmental documents reviewed had complete certification forms, six (50%) had nearly completed forms, and two (17%) had no forms.

Attainment of Supportable NEPA Decisions

Legal sufficiency determinations are measured by:

- **Percent of final EIS/Section 4(f)s with legal sufficiency determinations in file:** It is too early to measure this metric as there were no final EISs or Section 4(f) evaluations approved by Caltrans during the period of this assessment. This metric will be evaluated in future self-assessments.

Compliance with Caltrans environmental document content standards and QC review procedures is measured by:

- **Percent of projects that followed the environmental document annotated outlines based on environmental document preparer signatures appearing on QC certification forms:** The environmental document preparer certifies that the environmental document was prepared consistent with the applicable environmental document annotated outline contained on the SER. Seven of the 12 projects (58%) reviewed had certification forms with the environmental document preparer's signatures certifying compliance with the annotated outline. As part of the self-assessment, at least one environmental document from each of the 8 Districts that were visited, or a total of 10 documents, were reviewed for consistency with the applicable annotated outline. This review indicated that all 10 documents generally followed the annotated outlines in terms of chapter and section organization. Therefore, it is likely the missing certifications are not indicative of noncompliance with the annotated outlines.
- **Percent of projects with completed and signed QA/QC certification forms in file:** The form certifies that the required environmental document QC review steps were followed. As indicated above, four of the 12 (33%) environmental documents reviewed had complete certification forms, six (50%) had nearly completed forms, and two (17%) had no forms.

Documentation of project records for projects under the Pilot Program is measured by:

- **Percent of sampled EA/EIS project files following established UFS:** Sixteen of the 19 (84%) project files reviewed were consistent with the UFS.

Effectiveness of Relationships with Agencies and the General Public

The change in communications among Caltrans, federal and state resource agencies, and the public is measured by:

- **Compare Gallup poll and public survey data related to relationships with resources agencies and the public over time:** Neither a Gallup poll surveying relationships with agencies nor a public survey assessing relationships with the public under the Pilot Program has yet been undertaken. This metric will be evaluated in future self-assessments.

Caltrans responsiveness to substantive comments received from public and interest groups on NEPA documents is measured by:

- **Percentage of final document QC forms with public review comments box checked:** One measure of the effectiveness of relationships with the public is whether public review comments on draft environmental documents have been appropriately addressed. The QC certification form includes certification that comments have been appropriately addressed.

  Two of the four projects (50%) with final environmental documents had a certification form that indicated that public review comments had been appropriately addressed. On another project, FHWA reviewed the administrative final environmental document. The fourth final environmental document lacked the certification form.

Caltrans ability to effectively resolve external conflicts is measured by:

- **Date that formal conflict resolution process began to date resolution reached:** This metric cannot be measured since a formal conflict resolution process was not initiated on any of the reviewed projects. This metric will be evaluated in future self-assessments.

Timely Completion of NEPA Process

Timely NEPA document approvals under the Pilot Program are measured by:

- **Compare time from administrative draft environmental document to draft environmental document approval before and after delegation:** As indicated above in the "Timeliness of Environmental Decisions' section, under the Pilot Program, a 59% time savings has been achieved for review and approval of draft environmental documents. The three draft environmental documents independently reviewed by Caltrans were approved in a median time of 2.5 months, as compared to 6.1 months prior to the Pilot Program.
- **Compare time from administrative final environmental document to final environmental document approval before and after delegation:** As indicated above in the "Timeliness of Environmental Decisions' section, a 71% time savings has been achieved for review and approval of final documents since initiation of the Pilot Program. The two final environmental documents independently reviewed by Caltrans were approved in a median time of 0.7 months, as compared to 2.4 months prior to the Pilot Program.

Timely completion of interagency consultations under the Pilot Program is measured by:

- **Compare time from submittal of complete biological evaluation/biological assessment to receipt of letter of concurrence or biological opinion before and after delegation:** It is too early to measure this metric since approvals related to the federal Endangered Species Act have not been made under the Pilot Program. This metric will be evaluated in future self-assessments.

Summary of Areas Needing Improvement

In summary, this first self-assessment indicates that the following areas need improvement:

- 100% compliance is needed for the following:
  - *Completion of the Environmental Document Preparation and Review Tool.* The project generalists on two of the three projects without a completed checklist were aware of this tool, and had a partially completed checklist in the project file. It appears that schedule may have been a factor leading to incomplete checklists. In general, Caltrans staff appear to be aware of the requirement to complete the checklist, but adherence to this requirement needs to be improved.
  - *Completion of the Environmental Document Quality Control Review Certification Form*. Projects in transition between pre-Pilot Program and Pilot Program requirements, confusion over the timing of the NEPA QC review, and schedule likely played a role in the number of incomplete or absent certification forms. In general, Caltrans staff appear to be aware of the requirement to complete the certification form, but adherence to this requirement needs to be improved.

- *Project files consistent with the UFS*. District staff appeared to aware of the requirement to establish files following the UFS, and nearly all reviewed project files were consistent with this requirement. The reason for less than 100% compliance can be largely explained by ongoing projects in transition between pre-Pilot Program and Pilot Program requirements. Adherence to this requirement is relatively good, but needs to be improved.

- The format of the environmental document QC certification form is causing confusion for some environmental generalists over when the NEPA QC reviewer signature is needed.
- Caltrans supervising senior answers to the interview question related to record retention provided a number of answers ranging from "3 years" to "as long as needed". It is unknown whether staff are fully aware of the record retention requirements specified in section 8.3 of the Pilot Program MOU.

Corrective Actions

Caltrans will undertake the following corrective actions for the identified areas needing improvement. Future self-assessments will evaluate the success of these corrective actions:

- To achieve 100% compliance in completion of the environmental document preparation and review tool and the QC review certification form, and 100% compliance with the UFS, Caltrans will:
  - Reinforce these requirements through a variety of means including, emails from Headquarters to District/Region staff reminding them of these requirements; ongoing verbal reminders by Headquarters Environmental Coordinators during District visits; distribution of follow-up memoranda to the Districts regarding the self-assessment findings; reminders at the monthly NEPA delegation teleconferences; and continued formal and informal networking between Headquarters and the Districts/Regions and within the Districts/Regions reinforcing Pilot Program environmental document QC requirements.
  - For one District, a new form will be developed that will need to be signed by the Office Chief for Environmental Assessment and the District Deputy Director for Environmental, certifying that the environmental document QC review process requirements have been met, prior to approval of all draft and final environmental documents.
- The environmental document QC certification form will be revised to clarify the two certifications that must be made by the NEPA QC reviewer. Specifically, the form will be revised to clarify that the certification related to compliance with federal policies, guidance, and requirements is required for both draft and final environmental documents, whereas certification that public review comments have been appropriately addressed is only required for final documents.
- Caltrans Headquarters will issue an email to the Districts/Regions reminding them of the record retention requirements of section 8.3 of the Pilot Program MOU.

Statement by Chief, Division of Environmental Analysis

Based on this first self-assessment of Caltrans QA&QC processes under the Pilot Program, I find that Caltrans processes are working to ensure that the responsibilities Caltrans has assumed under part 3 of the Pilot Program MOU are being carried out in accordance with the Pilot Program MOU and all applicable federal laws and policies. This self-assessment indicates that, although Caltrans Pilot Program QA&QC processes are not yet being implemented as intended 100% of the time, Caltrans' NEPA documents and decisions meet all applicable federal laws, requirements, policies, and standards.

Signed: _____

Jay Norvell, Chief, Division of Environmental Analysis
California Department of Transportation

Date: Dec. 21, 2007

Table 1. Training Summary Related to Pilot Program Requirements

Course/Presentation	Date	Audience	Approximate Attendance
Formal Training for Caltrans Staff			
NEPA Delegation Workshop	January and March 2007	Generalists	240
NEPA Compliance Training	July and September 2007	NEPA QC reviewers	50
Environmental Analysis Intensive	December 2007	Generalists	24
Categorical Exclusion Workshops	September and December 2007	New staff, journey-level environmental staff	70
Local Assistance Academy	March 2007	Local Assistance engineers and environmental planners	50
Kingvale Academy	May 2007	District Local Assistance engineers and design engineers	40
FHWA Audit Training	January and August 2007	District audit coordinators, District Local Assistance NEPA Delegation Coordinators, and Headquarters NEPA Delegation staff	20 (January) 25 (August)
FHWA Section 4(f) Training	September 2007	Generalists, Headquarters Environmental Coordinators, and attorneys	50
USFWS National Conservation Training: Developing Biological Assessments	November 2007	Biologists	10
Informal Training for Caltrans Staff			
Pilot Program Awareness Presentations	Approximately 7 presentations in August–October, 2007	Environmental staff in Districts 1, 2, 3, 4, 7, 8, and 12	Various
FHWA Audit Awareness Presentation	Approximately 4 presentations in August–October, 2007	North Region environmental staff	100
NEPA Delegation Teleconferences	Monthly since July 2007	Statewide environmental staff	Approximately 10–20 staff per teleconference
Caltrans Design Senior Seminar	July and September 2007	Statewide design engineers	170
Caltrans Project Delivery Advisory Committee	January and July 2007	Statewide District Directors and Project Delivery Division Chiefs	20
Design Management Board	May 2007	Statewide design engineers	25
Project Management Board	May 2007	Statewide project managers	25
LP2000 Database Training	April 16 and 17, 2007	Statewide District Local Assistance staff	18
Division of Local Assistance Implementation Offices	July 2007	Headquarters Local Assistance staff that process funding requests	20
District Local Assistance Engineers Council	Every other month	Statewide District Local Assistance engineers and office chiefs	18
District/Region internal workshops and briefings (management briefings, planning workshops, team building workshops, meet and greets, etc.)	March–December 2007	Districts 1, 2, 3, 5, 7, 10, 11, and 12	Various

Table 1. Continued

Course/Presentation	Date	Audience	Approximate Attendance
Training for Local Agency Partners			
Local Partner Pilot Program Awareness Presentations	January 31, 2007	California Transportation Commission (CTC), Rural Transportation Planning Agency (RTPA) meeting (CTC staff, RTPA agency heads and staff, consultants)	60
	November 2007	Self-Help Counties Coalition's annual Focus on the Future conference (local agencies and consultants)	100
	February 2007	Rural Counties Task Force (local agency planning directors) (Districts 1, 2, and 3)	10
	March-December 2007	North Region local agency public works staff	30 (two presentations)
	December 2007	NorCal Teambuilding Group, two presentations (Districts 1, 2, and 3)	30
	September 2007	Sacramento Area Council of Governments Regional Planning Partnership	15
	January and September 2007	Local agencies and regional transportation agencies and associations (Districts 1, 4, 5, 8, and 10)	Various
	March-December 2007	Shasta Planning and Environment Linkages Workshop (District 1)	Various
		Metropolitan Transportation Commission (District 4)	15
		Santa Barbara Council of Governments (COG) Technical Advisory Group, Santa Cruz County Regional Transportation Commission Technical Advisory Committee, and City of Santa Maria (District 5)	Various
		Regional transportation planning agency (SANBAG), local agency and consultant entities (District 8)	75 (seven presentations)
		Merced COG, San Joaquin COG & Technical Advisory Committee, Stanislaus COG, and Stanislaus Public Works (District 10)	Various
		Orange County Transportation Authority (District 12)	5
		South Tehachapi Teambuilding group (local agency public works staff) (Districts 7, 8, 11, and 12)	35
Pilot Program Consultant Awareness Presentation	Approximately 8 sessions between July–December 2007	District 4 consultants	15–20 consulting firms
	November 2007	Consulting Engineers and Land Surveyors of California (CELSOC) Sacramento Chapter	10
Project-specific local partner outreach (one-on-one meetings, PDT meetings, field reviews, etc.)	July–November 2007	Local agency partners and consultants in Districts 5, 6, 8, 10, and 12	Various

Attachment 1. Pilot Program Performance Measures

Performance Measure	Components of Measure	Desired Outcome	Tool/ Indicator to Measure Outcome	Metric
Compliance with NEPA and other Federal laws and regulations	Maintain documented compliance with procedures and processes set forth in the Pilot Program MOU for the environmental responsibilities assumed under the Pilot Program.	Caltrans performs self assessments as required by the MOU	Self assessment report submitted to FHWA	Percent of self assessment reports submitted to FHWA
		Caltrans implements corrective actions as necessary	Subsequent self assessments and FHWA audits	Percent of identified corrective actions that are implemented
	Maintain documented compliance with requirements of all Federal laws and regulations being assumed (Section 106, Section 7, etc).	100% of draft and final complex EAs/EISs have completed environmental document review checklists	Completed draft and final environmental document review checklists in file	Percent of draft and final complex EA/EIS projects with completed checklists in file
		100% of quality control reviewers are certifying compliance with Federal requirements on the QC certification form	Completed QC certification form(s) (internal and/or external) in file	Percent of projects with completed QC certification form(s) (internal and/or external) in file

Table 1. Continued

Performance Measure	Components of Measure	Desired Outcome	Tool/ Indicator to Measure Outcome	Metric
Attainment of supportable NEPA decisions	Legal sufficiency determinations made by counsel on FEISs and individual 4(f) determinations	100% of FEISs and individual 4(f)s determined to be legally sufficient	Legal sufficiency determination in file	Percent of FEIS and individual 4(f)s with legal sufficiency determinations in file
	Compliance with Caltrans environmental document content standards and procedures	Annotated Outline *State Highway System (SHS)*: 100% of NEPA documents follow applicable annotated outline *Local Assistance*: 100% of NEPA documents started after publication of LAPM Chapter 6 follow the applicable annotated outline	Annotated Outline Environmental document preparer signature on QC certification form certifying consistency with annotated outline	Annotated Outline Percent of projects with environmental document preparer signature on QC certification form certifying consistency with annotated outline
			Self assessment team evaluation of a random sample of District/Region environmental documents	Percent of sampled environmental documents that followed applicable annotated outline
		QA/QC Procedures 100% of EAs and EISs that follow environmental document review QA/QC procedures	QA/QC Procedures QC certification form(s) (internal and/or external) are complete and filed appropriately	QA/QC Procedures Percent of projects with completed and signed QC certification form(s) in file
	Documentation of project records for projects under the Pilot Program	100% of EA and EIS projects follow the established Environmental Uniform Filing System	Self assessment team evaluation of a random sample of District/Region EA/EIS files	Percent of sampled EA/EIS project files following established filing system

Performance Measure	Components of Measure	Desired Outcome	Tool/ Indicator to Measure Outcome	Metric
Monitor relationships with agencies and the general public (Effectiveness of relationships with agencies and the general public)	Assess change in communication among Caltrans, Federal and State resource agencies, and the public	Median/average scores on surveys developed to assess communications remain consistent or improve over time	Agency Gallup poll Public Exit survey at public meetings with numeric scoring system	Compare data over time
	Maintain effective responsiveness to substantive comments received from the public, agencies, and interest groups on NEPA documents	100% of final environmental document QC certification forms certify that all public review comments have been appropriately addressed	NEPA QC reviewer signature on final document QC certification form and public review comments box checked	Percentage of signed final document QC certification forms with public review comments box checked
	Maintain effective NEPA conflict resolution processes whenever appropriate	Formal conflict resolution processes lead to timely conflict resolution	Length of time in formal conflict resolution process for: - NEPA/404 - Section 7	Date that formal conflict resolution process began to date resolution reached

Table 1. Continued

Performance Measure	Components of Measure	Desired Outcome	Tool/ Indicator to Measure Outcome	Metric
Timely completion of NEPA process	Compare time to completion for environmental document approvals before and after July 1, 2007	Timely document approvals	Time taken to review and approve draft and final documents for: - SHS projects - Local Assistance projects	For SHS and Local Assistance projects: Compare time from begin Admin. DED District QC process to DED approval before and after delegation Compare time from begin Admin. FED District QC process to FED approval before and after delegation
	Compare time to completion for key interagency consultations formerly requiring FHWA participation before and after July 1, 2007	Timely agency consultation	Time taken for Section 7 consultation	Compare time from submittal of biological evaluations/biological assessments to receipt of letters of concurrences/BOs before and after delegation