

WSDOT Projects - NEPA Documentation Roles

This document defines specific roles and responsibilities of WSDOT project teams, Environmental Services Office (ESO) Discipline and NEPA Specialists, and the Federal lead agency for specific environmental documentation process work activities. The information provided is consistent with the [WSDOT-FHWA Stewardship and Oversight Agreement](#). While it is specific to FHWA projects, it includes general information for non-FHWA projects. Contact the NEPA Specialist about roles or how this information applies to non-FHWA federal lead projects.

Roles and Responsibilities

Project Team

- Allocates resources.
- Resolves comments on document drafts.
- Schedules and coordinates environmental document review cycles.
- Produces high-quality environmental documents (Helpful Tool! sidebar).

Region/Mode Environmental Manager

- Approval authority for NEPA CEs.
- SEPA Responsible Official.

Environmental Coordinator

- Leads the environmental documentation effort.

Subject Matter Expert

- Serves as writer and/or reviewer in the NEPA documentation process (*Subject Matter Expert – a closer look* sidebar).
- Ensures document accuracy and information adequacy, including supporting studies or reports for environmental impacts, and provides independent evaluation of the technical accuracy and completeness of draft and final reports.
- Ensures “right-sizing,” required formatting, and content discussion, as outlined in the Environmental Manual (EM).
- Advises and guides the project team or author on report completeness.

Helpful Tool!

A **Quality Assurance/Quality Control Plan** can assist with:

- Coordinating document writers and reviewers.
- Creating an efficient communication strategy.
- Developing schedules for drafts and reviews.

Subject Matter Expert – *a closer look*

Subject Matter Experts are not document approvers.

Instead, they write and/or review their respective section(s) of the NEPA EA or EIS document to ensure the information is accurately summarized.

WSDOT Projects - NEPA Documentation Roles

ESO NEPA Specialist

- Keeps ESO Director updated throughout environmental documentation process and supports project teams with statewide experience, examples, technical assistance, and general support.
- Participates during scoping, planning, design, and environmental documentation processes for evaluations and re-evaluations.
- Assures document quality before documents are submitted to the Federal lead agency for review and approval.
- Ensures topic discussions are procedurally accurate, substantively adequate, legally sufficient, and address project risks.
- Reviews entire NEPA EAs, EISs, re-evaluations, and SEPA EISs, and checks for required components (*NEPA Specialist Review Components* sidebar)
- Assists development of defensible final documents before ESO Director signs final EAs and EISs.
- Arranges pre-signatory meetings with the project team, answers process questions at document signing and summarizes issues relevant to the ESO Director's concerns.

WSDOT NEPA Document Signatory / SEPA Responsible Official

- *Signatory authority is shared with the federal lead agency.*
- Verifies appropriate level of study are used to describe impacts.
- Assures the procedural requirements of NEPA and SEPA are satisfied, including appropriate public involvement.
- Ensures the project is fiscally constrained (in the STIP).
- Indicates the document is complete and the documentation process meets established guidelines, formats, and environmental procedures.
- The ESO Director is SEPA "Responsible Official" for WSDOT SEPA EISs and ensures adequate and accurate SEPA process and documents.
- The ESO Director signs WSDOT NEPA EAs and EISs as agency Co-Lead, which signifies that WSDOT has reviewed and accepted a document according to the [Oversight Agreement](#).

NEPA Specialist Review Components

The NEPA Specialist reviews / ensures the following:

1. Purpose & Need, logical termini, independent utility.
2. Completeness of alternatives analysis (including the *no-build* alternative).
3. Free of environmental documentation "*common issues*" ([Comment Form Analysis](#) and [Legal Checklist](#)).
4. Evidence of required coordination with federal, state, and local agencies, and appropriate discussion of public involvement.
5. Compliance with applicable NEPA procedures as defined in the Environmental Manual.

Federal Lead Agency, Document Signatory, "NEPA Approver"

- *Signatory authority can be shared with state agency.*
- Approves and signs NEPA documents when WSDOT demonstrates compliance with all relevant federal funding and/or approval requirements.
- Coordinates with project teams on scope and findings of studies and directs teams toward complete documentation.
- Serves as technical and documentation specialist, and document signatory.
- Approves completion of appropriate NEPA documentation process and CEQ NEPA regulations.

WSDOT Projects - NEPA Documentation Roles

NEPA Documentation Role Summary Table for WSDOT Projects – WSDOT and FHWA Roles

NEPA Roles Work Activity	Project Team - Environmental Coordinator	Discipline Specialist	ESO NEPA Specialist	WSDOT NEPA Document Signatory / SEPA Responsible Official	FHWA - Federal Lead & Document Signatory
Determination of NEPA Classification for all projects with Federal funds or FHWA approval.	Makes preliminary determination based on project type and anticipated impacts (or uses determination from Capital Program Development and Management Office found in Project Summary). Consults with FHWA.	n/a	Provides guidance/input to project team as requested.	n/a	Makes final decision on appropriate NEPA classification. <i>Most CE-level determinations are made by the Project Team, without consultation with FHWA.</i>
Categorical Exclusions (CE)	Prepares documentation.	n/a	Provides guidance/input to project team as requested.	Region/Mode Environmental Manager reviews and signs.	Periodic process reviews.
Discipline Reports	Prepares, reviews, and submits to FHWA. (PRO 400-ab3)	Prepares/reviews as requested. (PRO 400-ab3)	Provides guidance/input to project team as requested.	n/a	Reviews and comments.
Section 4(f) and 6(f) Evaluations	Prepares and submits to FHWA for approval. (PRO 457-a)	Prepare or review section of the Section 4(f) or 6(f) document as requested.	Provides guidance/ input to project team as requested. Review prior to signature.	n/a	Reviews and approves.

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Environmental Assessment (EA)	Prepares and submits to FHWA for approval. (PRO 400-a)	Prepare/reviews requested sections of EA.	Provides guidance/ input to project team throughout process. Reviews prior to signature and schedules signature briefing.	Reviews and signs as complete. (PRO 400-ab4)	Reviews and approves.
Finding of No Significant Impact (FONSI)	Prepares and submits to FHWA for approval. (REF 400-a1)	n/a	Reviews EA comment responses. Provides requested guidance/input to project team.	n/a	Reviews, revises, and issues FONSI.
Environmental Impact Statement (EIS)	Prepares and submits to FHWA for approval. (PRO 400-b)	Prepares or reviews sections of the FEIS as requested.	Coordinates NEPA strategy, reviews for completeness, provides comments, ensures comments addressed, schedules signature briefing.	ESO Director reviews and approves. (PRO 400-ab4)	Division Administrator reviews and approves. Posts NOA in Federal Register. (REF 400-ab5)
Record of Decision (ROD)	Prepares Draft ROD and forwards to FHWA. (REF 400-b5)	n/a	Coordinates third-party review, reviews for completeness, provides comment, schedules signature briefing.	n/a	Reviews, revises, signs, and issues ROD.

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Supplemental Draft or Final Environmental Impact Statement (SDEIS or SFEIS)	Prepares and submits to FHWA for approval. <i>Supplement follows same process as document it is supplementing.</i>	Prepares or reviews sections of SDEIS or SFEIS as requested.	Reviews for completeness and assures comments have been addressed.	ESO Director reviews and approves. (PRO 400-ab4)	Area Engineer for SDEIS and Division Administrator for SFEIS reviews and approves.
Re-evaluation	Coordinates with Document signatories to determine if new information exists, changes have occurred to project, and completeness of information. (PRO 400-c)	Prepares or reviews sections of the re-evaluation as requested.	Provides independent, third party, internal review, as requested.	n/a	Area Engineer reviews and approves.
Statute of Limitations (SOL) Federal Register Notice (<i>applies to any Federal project approvals – ROD, FONSI, Corps Permit, CE, etc.</i>)	Consults Attorney General's Office and FHWA regarding decision to publish notice. Drafts notice and submits to FHWA.	n/a	Reviews and contributes, as requested. Provide stools and examples. Reports to ESO Director.	Reviews draft SOL.	Consults FHWA legal counsel if necessary. Publishes notice.