

Environmental Quality Management

Quality Management and Its Relationship to the Schedule
Common Quality Issues with Documentation

QUALITY MANAGEMENT AND ITS RELATIONSHIP TO THE SCHEDULE

Quality management is the consistent and intentional effort to meet or exceed standards for all environmental tasks, documents, and related deliverables. Consultant deliverables are prepared on behalf of GDOT to address all procedures, preferences, and management decisions. Therefore, in-house and consultant documents need to reflect consistent quality that achieves agency approval and supports GDOT project delivery.

When environmental deliverables fail to meet GDOT quality standards, the project schedule is negatively affected. In fact, each additional revision of a technical study, NEPA document, or permit application costs extra days, weeks, and even months that have not been provided for in the project schedule. Office of Environmental Services (OES) has procedures to ensure that consultant and GDOT reviewers are well-qualified and that consistent milestones are followed to review and approve environmental deliverables. These procedures require that all technical staff and document preparers commit to the following:

- > Reduce and remove errors;
- > Address all current procedures; and
- > Submit well-written draft reports on schedule.

When GDOT reviews indicate avoidable errors and missed procedures, quality management has not been implemented correctly or consistently by the deliverable preparer.

Preparing Quality Documents

All environmental studies, technical reports, and documents use methodologies, templates, scope-of-work, and style/format guidance established by OES. Where a document template is not available, consultants should contact the GDOT environmental staff for further guidance. The technical report or document should present the study findings in a logical

manner and not contain contradictory information. Individuals performing reviews also must be intimately familiar with GDOT's policies and procedures.

All studies, reports, and documents must be thoroughly reviewed prior to submittal to OES. The first review is the responsibility of the consultant Environmental Analyst or Environmental Subject Matter Expert (SME) that prepared the document. The preparer must closely review his or her own work before submitting it for an internal review. The second review is performed by a consultant Environmental Analyst or Environmental SME who did not perform the work. The second review must confirm that the technical report or document uses the correct methodology, accurately presents the study findings, and meets all current legal and regulatory requirements. The document also must be reviewed for spelling, grammar, and formatting.

For studies, reports, and documents prepared by a sub-consultant, the contract's prime must review the product prior to its submittal to GDOT to ensure that the entire consultant team is working in tandem.

All project teams, including GDOT environmental staff, consultants, and local governments, must strive to submit high-quality technical documents that can be approved on the first submission. The document preparer is professionally responsible for the content and quality of the studies, reports, and technical documents submitted. *A sloppy presentation calls into question the substantive quality of the evaluations being presented.*

The American Association of State Highway and Transportation Officials (AASHTO) developed a handbook to aid the development of NEPA Documents for transportation projects.

Preparing High Quality NEPA Documents for Transportation Projects, AASHTO Practitioner's Handbook

AASHTO, July 2014

COMMON QUALITY ISSUES WITH DOCUMENTATION

Common Omissions

1. The plans being analyzed during the environmental process do not match the plans being authorized for ROW and construction funds. Each team member must utilize the same plans and project information when conducting their studies.

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2. All technical reports and documents are not prepared in accordance with the most current regulations and methodologies. If changes to the regulations have occurred since the study began, the study must be updated prior to submittal of the environmental document for GDOT approval and any required agency approvals. If methodologies have changed, the preparer must discuss the change with environmental team leaders and managers as well as agency personnel to determine if the study must be redone.
3. Appropriate agency consultations are not conducted.

Additional Common Errors

1. Unsubstantiated and poorly defined conclusions.
2. Lack of consistency between sections.
3. Lack of consistency between text, tables, and figures.
4. Lack of consistency between the plans, the cultural resource analysis, and ecology analysis.
5. Details discussed in the text not displayed on graphics (ROW limits, survey corridor, etc.).
6. Sections missing.
7. Proposed actions not in keeping with GDOT policy statements (e.g. a commitment to improve a historic resource when the historic resource will have No Adverse Effect from the project).
8. Statements not in keeping with regulations (e.g., buffer variance not required since encroachment is the result of a perpendicular crossing, or ineligible evaluations for archaeological sites when the site has not been fully delineated outside the project).
9. Statements not in keeping with federal agency policy (e.g., not addressing all three aspects of logical termini, or not adhering to FHWA's 4(f) policy paper).
10. Graphics and/or tables not cited in the narrative.
11. Inconsistent style (e.g. capitalization convention, acronym use, change in font type/size, "Department" vs. "GDOT").
12. Not clearly defining terms for the general public (writing for the reader).
13. Not spell-checked.
14. Incorrect grammar.
15. Poor readability. Use strong verbs and short sentences.

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16. Not using the most up-to-date templates available.
17. Documents are not reviewed by the prime consultant (when the product is sub-consulted).
18. Comments in previous review not addressed.