OHIO DEPARTMENT OF TRANSPORTATION

NEPA Assignment Self-Assessment #4
4/1/2018 through 3/31/2019

Prepared by the Ohio Department of Transportation, Office of Environmental Services

June 27, 2019

Executive Summary:

This Self-Assessment is to ensure the Ohio Department of Transportation (ODOT) is compliant with the 23 USC 327 Memorandum of Understanding (MOU) between ODOT and the Federal Highway Administration (FHWA). As required by Section 8.2.5 of the MOU, ODOT must submit a Self-Assessment Report prior to each FHWA annual audit. The current Self-Assessment was prepared for the fourth audit. This is the final Self-Assessment that we will perform under the NEPA Assignment Program.

The Review Team conducted a self-assessment of ODOT's environmental and NEPA processes, and of projects approved between April 1, 2018 and March 31, 2019. The Review Team reviewed projects from all 12 Districts and the Ohio Rail Development Commission (ORDC), and conducted a survey with three state and three federal partner agencies, focusing on NEPA processes, roles, and responsibilities. The Review Team also assessed ODOT's program management processes within the Office of Environmental Services (OES), the Districts, and the ORDC by using checklists.

Overall, ODOT is compliant with the MOU and all assumed laws and regulations. However, the Review Team identified Non-Compliance with Executive order 11990 (See page 4 for details).

Results of the Self-Assessment:

Action Area	In compliance: Self-Assessment shows that the state is in compliance with these areas (Include Best Practices, if any).	Observations: Self-Assessment shows potential items that pose a clear and direct compliance issue with a law/regulation or one that if not addressed, could lead to a future full compliance issue.	Findings: Self-Assessment shows non-compliance with these areas.	Not Applicable: This area was not observed during this Self-Assessment period.
General Compliance Results				
Clean Air Act (CAA), 42 U.S.C.	X			

Action Area	In compliance: Self-Assessment shows that the state is in compliance with these areas (Include Best Practices, if any).	Observations: Self-Assessment shows potential items that pose a clear and direct compliance issue with a law/regulation or one that if not addressed, could lead to a future full compliance issue.	Findings: Self-Assessment shows non-compliance with these areas.	Not Applicable: This area was not observed during this Self-Assessment period.
Compliance with the noise regulations at 23 CFR part 772	X			
Endangered Species and Habitat (*i.e. Section 7 of the Endangered Species Act of 1973, Fish and Wildlife Coordination Act, 16 U.S.C., Migratory Bird Treaty Act, 16 U.S.C.*)	X			
Section 106 of the National Historic Preservation Act of 1966	X			
Section 4(f) of the Department of Transportation Act of 1966	X			
Native American Grave Protection and Repatriation Act (NAGPRA)				X
Farmland Protection Act (FPPA)	X			
Clean Water Act	X			
Wild and Scenic Rivers Act	X			
Land and Water Conservation Fund (LWCF) Act	X			

Action Area	In compliance: Self-Assessment shows that the state is in compliance with these areas (Include Best Practices, if any).	Observations: Self-Assessment shows potential items that pose a clear and direct compliance issue with a law/regulation or one that if not addressed, could lead to a future full compliance issue.	Findings: Self-Assessment shows non-compliance with these areas.	Not Applicable: This area was not observed during this Self-Assessment period.
E.O. 11990, Protection of Wetlands			X (See Findings on Page 4)	
E.O. 11988, Floodplain Management	X			
E.O. 13690, Federal Flood Risk Management Standard (FFRMS)	X			
E.O. 12898, Environmental Justice	X			
Section 601 of 42YSC 200(d) (Title VI)	X			
Other	X			

In Compliance:
The Review Team found ODOT's Self-Assessment to be satisfactory overall. District staff illustrated their knowledge of policies and OES guidance documents and how to use them to produce NEPA documents compliant with the laws and regulations assumed under the 23 USC 327 MOU. ODOT has training, guidance, and agency agreements to detail the processes in place to ensure compliance with all state and federal regulations. In addition, all guidance documents are updated to facilitate any changes required by the MOU and NEPA Assignment. Since ODOT had robust programmatic agreements (PA) with various environmental agencies prior to NEPA Assignment (Categorical Exclusion PA, Section 106 PA, etc.), ODOT-OES and District staff have been able to easily continue NEPA studies and approvals with minimal changes, allowing ODOT to remain compliant.

Best Practices:
ODOT's program management, document and records management, training program, and legal sufficiency review processes are compliant with the MOU and assumed laws. ODOT partnered with its resource agencies to develop escalation procedures in preparation for NEPA Assignment; however there has never been a need to implement these procedures. Additionally, further guidance documents and training courses were offered to prepare and

provide information to environmental staff and consultants. ODOT ensures all environmental staff and consultants who work on ODOT projects have the required training and/or prequalification for the work they are performing, and enforces the processes described in OES guidance materials. Furthermore, ODOT's record retention exceeds what is required by FHWA and Ohio Department of Administrative Services policies.

Observations (Areas of Concern):
ODOT's observations are minor issues that could potentially lead to future compliance concerns. ODOT is confident these issues have either already been addressed, or will be addressed and remedied in the immediate future.

- **Project Details:** The NEPA Start Date must be entered on the Project Details Tab in EnviroNet for every project. This was identified as a "Needs Improvement" area due to the high number of projects that did not include this date in the project file. Districts were reminded that the date must be entered on the Project Details Tab for every project.

- **Ecological:** The Standard Response to ODNR and USFWS Comments for the Eco MOA must be included on every project unless it is ecologically exempt. This was identified as a "Needs Improvement" area due to the high number of projects that did not include this discussion in the project file. Districts were reminded that the form must still be completed, even if the project is non-notifying as there may still be waterway impacts. There could potentially be a non-notifying project that is not eco exempt. These projects are considered non-notifying BECAUSE we agreed to consider those MOA conditions.

- **Embedded Legal Staff:** For the past three years, ODOT has placed our Environmental Attorney within the Office of Environmental Services. This approach was noted as a best practice by FHWA and was very effective at proactively addressing potential legal risks and issues that may arise on any project. Recently, ODOT's leadership felt it was best to reassign ODOT's Environmental Attorney to be located within the Office of Chief Legal Counsel. As a result, this change in location requires the Environmental Attorney and OES staff to work harder to engage each other. Thus far, OES and our legal team have continued to proactively coordinate, and no negative impacts have resulted due to this change. Additional future monitoring will be needed to ensure a high level of coordination continues.

- **Findings (Non-Compliance)**
  The Review Team identified one area of non-compliance during the Self-Assessment.

- **Wetland Findings Form:** There were four districts, two with one project and two with two projects, for which the Wetland Findings Form was not uploaded to the project file. This is non-compliant with Executive Order 11990. This was addressed by the district uploading the form and doing a letter re-evaluation to acknowledge the fact that the decision was reconsidered with this information included in the record and the decision remained the same. In the future, the Wetland Findings Form is being built into the Ecological Survey Report enhancements to EnviroNet. This new update will be released later this year and will include a process where the Wetland Findings Report is more automatically generated in the system.

- **Performance Measures:**
  The following is a discussion on how ODOT complied with all other components of the MOU.

  Compliance with NEPA and other Federal environmental statutes and regulations:
  As discussed above, other than the above isolated project-level instances, ODOT is compliant with NEPA and other Federal environmental statutes and regulations.

  Quality Control and Quality Assurance for NEPA decisions:
  Quality control and quality assurance occurred for all required documents and NEPA approvals. ODOT conducted reviews for all technical reports and documents for each NEPA document level as well as peer reviews for all D-level and above documents. Districts or consultants prepared discipline specific reports and OES approved each report or technical document before the NEPA document was approved. ODOT also instituted a peer-review process for all D-level and above documents on March 24, 2016. Depending on the level, the document is either peer-reviewed at the district level (D1) or at OES (D2 and higher) for discipline specific reviews. All peer-review processes are documented in EnviroNet. If peer-review occurred after the interim guidance was issued and prior to the EnviroNet updates, a memo-to-file was included in the project file documenting peer-review.

  Relationships with agencies and the general public:
  ODOT conducted a survey with the Ohio Department of Natural Resources (ODNR), the Ohio Environmental Protection Agency (OEPA), the Ohio History Connection's State Historic Preservation Office (SHPO), the United States Army Corps of Engineers (USACE), the United States Environmental Protection Agency (USEPA), and the United States Fish and Wildlife Service (USFWS) and discussed the results at our annual Partnering Meeting which was originally scheduled for January 2019 but was delayed until April 2019 due to a Federal Government shut down. Overall, the responses were positive regarding the agencies' professional relationship with ODOT, the materials ODOT submits, and ODOT's compliance with the laws each agency regulates.

  Increased efficiency and timelines in completion of NEPA process:
  U.S. Fish and Wildlife Service (USFWS) BA Processing

  Though there have been no formal BAs processed during this review period, ODOT continues to move at much faster pace under NEPA Assignment. ODOT's Section 7 consultation process is much more streamlined because we are working directly with USFWS.

  Project Process Savings:
  The following table outlines each environmental action that would have previously been submitted to FHWA for review prior to implementation of NEPA Assignment. During our Self-Assessment, we identified all approved projects that would have gone to FHWA for review and approval (Including all D3, EA, and EIS projects, as well as the actions [such as 4(f), UPIAR, etc.] for complex D1 and D2 projects). The FHWA review time for most of the actions would have been 30 days except for some of the Section 4(f) actions (de minimis impact finding, no use, etc.) and the Air/Noise Conformity (PM 2.5) documents which would have been for a 15 day non-objection period. Additionally, most items are submitted to FHWA more than once for back-checks, which is typically a 15 day review period. The overall reduction in project review time during our self-assessment period is an estimated 2355 days.

Actions that would have gone to FHWA for review/approval	Total # of Reviews
Policy Actions	
PDP Documents Reviewed	
Draft Purpose & Need (D3 & higher)	0
Alternatives Evaluation Report (D3 & higher)	0
Feasibility Study (D3 & higher)	0
NEPA Documents Reviewed/Approved	
Categorical Exclusion (D3)	1
Environmental Assessment	1
Environmental Impact Statement	0
Environmental Assessment Re-Evaluation	5
Environmental Impact Statement Re-Evaluation	1
Section 4(f) Recreational	
Section 4(f) Miscellaneous Documents	50
De minimis Impact Finding	11
Programmatic Evaluation	0
Individual Evaluation	0
Air Quality Conformity PM2.5 Documents Reviewed	
Air Quality Conformity PM2.5 Documents Reviewed	3
Ecological Actions	
Ecological Documents Reviewed	
Biological Assessment and/or Biological Opinion (ESA - Sec 7)	0
Other Actions	
UPIAR Documents Reviewed	
Underserved Populations Impact Analysis Report	7
Cultural Resources Actions	
Section 4(f) Documents Reviewed	
Section 4(f) Miscellaneous Documents	19
***De minimis* Impact Finding**	5
Programmatic Evaluation	1
Individual Evaluation	0
Section 106 Actions	
Adverse Effects sent to ACHP - effects	0
Adverse Effects sent to ACHP - MOA	0

ODOT's overall program has remained steady at $2.07 billion dollars. Even with ODOT's program growth over the years, we are still primarily focused on small "fix it first" type

projects which means less overall FHWA reviews required per project. However, despite these changes, ODOT continues to realize savings from the NEPA Assignment Program.

The following table shows the conservative estimated cost savings realized as a result of entering into NEPA Assignment. We used our Dashboard numbers as a starting point because the report includes the calculated numbers for all projects OES staff worked on during this review period, including actions for NEPA documents that were not approved during this review period.

From there, we took the numbers from our analysis and divided them up into small, medium or large projects and followed the formula listed in each of the groupings. The total cost savings realized from participating in the NEPA Assignment during our Self-Assessment period is an estimated $4.03 Million.

Project Size	# of Actions	# Days Saved per Review	Total # Days Saved
Small	18	15	270
	5	45	225
	1	60	60
	24	**120**	**555**
Medium	3	15	45
	6	45	270
	4	60	240
	13	**120**	**555**
Large		15	0
		45	0
	4	60	240
	4	**120**	**240**
TOTAL	**41**	**360**	**1350**

		# Days Saved	Amount Saved (Millions)
Small (<$20M)		555	
- Concurrent Reviews	35%	194	
		361	
- Critical Path Reviews	15%	54	**$1.04**
Average Project Amount	$4		
# Projects	48		
Total Cost (Millions)	$197		
Inflation Rate	3.5%		
Annual Savings (Millions)	$6.90		
# Months	12		
Monthly Savings (Millions)	$0.57		
# Days	30		
Daily Savings (Millions)	$0.02		

		# Days Saved	Amount Saved (Millions)
Medium ($20M-$149M)		555	
- Concurrent Reviews	30%	167	
		389	
- Critical Path Reviews	25%	97	**$1.93**
Average Project Amount	$34		
# Projects	6		
Total Cost (Millions)	$204		
Inflation Rate	3.5%		
Annual Savings (Millions)	$7.14		
# Months	12		
Monthly Savings (Millions)	$0.60		
# Days	30		
Daily Savings (Millions)	$0.02		

		# Days Saved	Amount Saved (Millions)
Large (>$150M)		240	
- Concurrent Reviews	30%	72	
		168	
- Critical Path Reviews	25%	42	**$1.07**
Average Project Amount	$261		
# Projects	1		
Total Cost (Millions)	$261		
Inflation Rate	3.5%		
Annual Savings (Millions)	$9.14		
# Months	12		
Monthly Savings (Millions)	$0.76		
# Days	30		
Daily Savings (Millions)	$0.03		

TOTAL SAVINGS   **$4.03**   **Million**

Self-Assessment Scope

The Self-Assessment is designed to ensure environmental documents prepared and approved following the execution of the NEPA Assignment MOU between FHWA and ODOT were compliant with the MOU and assumed laws and regulations. Furthermore, the review ensures all projects were approved at the appropriate document level and that all corresponding NEPA activities were conducted in accordance with federal and state regulations. The checklists indicate all areas reviewed for compliance and the associated results. Each district has a checklist based on project reviews. The statewide checklist is based on ODOT's projects overall. Finally, there is one overall ODOT program management checklist.

OES reviewed 15% of approved C1 and C2 documents and all D1, D2, D3, and EA level documents approved between April 1, 2018 and March 31, 2019. No EIS documents were approved within the review period. The Review Team reviewed projects based on the Project-Specific Checklist and combined all responses into District checklists to reflect the overall results. Districts 1, 11, and 12 also received a more in-depth review which included an interview. Interview questions focused on policies and procedures so the Review Team could obtain a well-rounded view of information on both program management and projects in relation to NEPA Assignment compliance. ODOT also conducted agency surveys with the Ohio Department of Natural Resources (ODNR), the Ohio Environmental Protection Agency (OEPA), the Ohio History Connection State Historic Preservation Office (SHPO), the Ohio Regional Transportation Office of the United States Army Corps of Engineers (USACE), the United States Environmental Protection Agency (USEPA), and the Ohio Division of the United States Fish and Wildlife Service (USFWS).

Self-Assessment Review Team:
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Previous Self-Assessment Resolution/Follow up
Immediately following Self-Assessment and Audit #3, ODOT-OES presented the results at a District Environmental Coordinators (DEC) meeting and at a consultant Environmental Update Meeting (EUM). Both of these meetings offered ODOT-OES an opportunity to provide an overview of the review's findings. The goal of this initial outreach was to provide the state's environmental workforce an opportunity to start addressing the review findings while OES continued to develop and refine an overall implementation plan to address the review findings in more detail, if applicable. Each district and ORDC was sent a copy of the ODOT Self-Assessment and FHWA's Audit #3 for review and consideration.

ODOT-OES worked collaboratively with each district and ORDC individually to review the Self-Assessment and Audit results specific to their district and to discuss what action should be taken to address areas identified for improvement, if any. All districts, ORDC, and OES were provided minor, project-level recommendation to assist in the preparation/completion of environmental documents in the future.

Both ODOT's Self-Assessment #3 and FHWA's Audit #3 identified several areas for improvement from a statewide perspective. Those areas focused on: Environmental Commitments, Environmental Justice and Public Involvement. To address these areas, ODOT took the following actions:

Environmental Commitments:
- The ODOT-OES Environmental Compliance Program Lead position has matured and become a commonly used resource for the districts. This position continues to focus on enhancing our Environmental Justice and Title VI compliance, as well as all other traditionally underserved populations.
- ODOT-OES provided training on the Environmental Commitments tab in EnviroNet and made minor updates to enhance our Guidance for Writing Environmental Commitments
- ODOT-OES presented audit results and new guidance at a District Environmental Coordinator Meeting, a Consultant Environmental Update Meeting, at OTEC, and various other ODOT meetings
- ODOT-OES recently launched a two-year environmental commitment review of all districts focusing on environmental commitment follow-through from inception all the way through construction and beyond. This involves in-field inspections and interviews and is being performed in partnership with FHWA.
- ODOT-OES increased oversight compliance reviews by performing in-field monitoring with consultant and ODOT staff

Environmental Justice:
- The ODOT-OES Underserved Populations Program Lead position has matured and become a commonly used resource for districts. This position continues to focus on enhancing our Environmental Justice and Title VI compliance, as well as all other traditionally underserved populations.
- ODOT-OES released an online Underserved Populations Training Class and recently partnered with the Division of Opportunity, Diversity, and Inclusion to further enhance and refine this training. ODOT-OES also updated its existing training classes (NEPA, CE, PI, and PDP) and converted all but the NEPA Training to an online class.
- ODOT-OES presented audit results and updated guidance and training at a District Environmental Coordinator Meeting, a Consultant Environmental Update Meeting, and during NEPA Chats
- ODOT-OES gave a presentation entitled "Addressing Underserved Populations in ODOT's Project Development Process" at the ODOT Civil Rights Symposium in April 2017 and another entitled "Designing for Environmental Justice" at the ODOT Civil Rights Symposium in April 2018 – update
- ODOT-OES has reached out to the ODOT Division of Opportunity, Diversity, and Inclusion to begin the development of performance measures for PI meetings for increasing diversity at public meetings and improving outreach to these communities

Public Involvement:
- ODOT-OES presented audit results and updated guidance re-emphasizing the PI process and documentation required at a District Environmental Coordinator Meeting, a Consultant Environmental Update Meeting, and during NEPA Chats.
- ODOT has enhanced its Public Involvement Requirements, which were approved by FHWA in April 2018 and continues the process of making sweeping changes and updates to the PI Manual and developing a toolbox with templates
- ODOT-OES continues to work on development of a public comment system as part of ODOT's website redesign project
- ODOT-OES interviewed other states to gain best practices regarding their public comment systems and have determined it is best to step back and look at redesigning ours based on those discussions

District Summaries:
OES reviewed the results of Self-Assessment 3 and Audit 3 with each district individually to discuss areas identified for improvement, if any, and what actions should be taken to address those areas. No district was placed on an action plan following Self-Assessment 3 or Audit 3.

Following is a summary of the areas in each district that were identified as needing improvement, non-compliant, or a best practice in all previous self-assessments:

DISTRICT 1

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Environmental Justice Mapping Maintenance of Traffic during NEPA PI Documenting PI Activities	n/a	n/a
2	Right-of-Way/Utilities Maintenance of Traffic Environmental Commitments Peer Reviews	n/a	n/a
3	n/a	n/a	Floodplains Report is well-organized
4	NEPA Start Date	n/a	n/a

DISTRICT 2

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Public Involvement File Management	n/a	n/a
2	Right-of-Way/Utilities Environmental Justice Public Involvement Environmental Commitments File Management	n/a	Following through with Environmental Commitments after approval
3	Environmental Commitments	n/a	n/a
4	n/a	n/a	n/a

DISTRICT 3

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Project Description NEPA Assignment Language Documentation of Floodplain Coordination Environmental Commitments ROW Plan Note	n/a	n/a
2	Project Description and Right-of-Way/Utilities Need Elements Environmental Commitments Section 4(f) and Environmental Justice Public Involvement File Management	n/a	n/a
3	NEPA Start Date	Wetland Finding Form Missing	n/a
4	n/a	n/a	n/a

DISTRICT 4

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Environmental Justice Mapping Public Involvement File Management Environmental Commitments	n/a	n/a
2	Right-of-Way/Utilities Maintenance of Traffic Disposal of Excess Right-of-Way File Management	n/a	n/a
3	n/a	n/a	n/a
4	n/a	Wetland Finding Form Missing	n/a

DISTRICT 5

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Environmental Justice Mapping Public Involvement Environmental Commitments Documentation	n/a	n/a
2	Right-of-Way/Utilities Community Impacts Environmental Justice Environmental Commitments Peer Reviews	n/a	n/a
3	Environmental Commitments	n/a	n/a
4	n/a	n/a	n/a

DISTRICT 6

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Project Description Environmental Justice Mapping Permits for LPA Projects Public Involvement File Management Environmental Commitments	n/a	Conceptual idea of MOT prior to NEPA clearance
2	Right-of-Way/Utilities Environmental Justice Maintenance of Traffic Public Involvement Environmental Commitments File Management	n/a	n/a
3	Environmental Commitments	n/a	n/a
4	Discussion of Eco MOA Comments	Wetland Findings Form Missing	n/a

DISTRICT 7

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Environmental Justice/Title VI Environmental Commitments File Management	n/a	Use of Noise Analysis Flowchart
2	Right-of-Way/Utilities Environmental Commitments File Management Miscellaneous	Public Involvement - project with TIP Amendment did not have the required STIP Amendment	n/a
3	Environmental Commitments	n/a	Use of Noise Analysis Flowchart Email to PM documenting Environmental Commitments Use of Farmland Review and Decision Document Includes quantified data in Project Description to justify C-listed projects with no Purpose & Need
4	n/a	n/a	n/a

DISTRICT 8

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Project Mapping Public Involvement Maintenance of Traffic Documentation File Management	n/a	n/a
2	Project Description and Right-of-Way/Utilities Environmental Commitments File Management Purpose & Need Public Involvement Environmental Justice	n/a	n/a
3	n/a	Wetland Finding Form Missing	n/a
4	Discussion of Eco MOA Comments	Wetland Finding Form Missing	Use of Air Flowchart

DISTRICT 9

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Purpose & Need Alternatives Eliminated Section 106 Determination Environmental Commitments Section 4(f) Public Involvement Maintenance of Traffic	Floodplain Coordination not completed	n/a
2	Utilities Community Impacts Public Involvement Environmental Commitments Project File Peer Review	n/a	n/a
3	Cultural Resources	n/a	n/a
4	n/a	n/a	n/a

DISTRICT 10

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Permits Environmental Commitments Public Involvement Environmental Justice Mapping Maintenance of Traffic Title VI Environmental Commitments	n/a	n/a
2	Utiilties and Right-of-Way Environmental Justice Maintenance of Traffic/Public Involvement Permits Environmental Commitments File Management Peer Review	Public Involvement - project approved without being on STIP/TIP	n/a
3	Project Details	n/a	n/a
4	n/a	n/a	n/a

DISTRICT 11

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Public Involvement - Title VI Environmental Commitments	n/a	n/a
2	Utilities and Right-of-Way File Management	n/a	Email to PM documenting Environmental Commitments
3	n/a	n/a	Email to PM documenting Environmental Commitments
4	n/a	n/a	n/a

DISTRICT 12

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Project details Logical Termini and Independent Utility Alternatives Analysis Identification of Historic Properties Farmland Mapping EJ Mapping Public Involvement Environmental Commitments Documentation	n/a	n/a
2	Section 4(f) Utilities and Right-of-Way Environmental Justice Maintenance of Traffic/Public Involvement FIRM Mapping Environmental Commitments File Management NEPA Assignment Language	Section 4(f) - coordination with SHPO not complete prior to document approval	n/a
3	Ecological Stage of Design	Wetland Findings Form Missing	Email to PM documenting Environmental Commitments
4	n/a	Wetland Findings Form Missing	Good Example of Path 2 Project with a Feasibility Study

ORDC

Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Not Reviewed	Not Reviewed	Not Reviewed
2	n/a	n/a	n/a
3	n/a	n/a	n/a
4	n/a	n/a	n/a

OES Self-Assessment	Needs Improvement	Non-Compliant	Best Practice
1	Not Reviewed	Not Reviewed	Not Reviewed
2	Not Reviewed	Not Reviewed	Not Reviewed
3	File Management Project Details	n/a	n/a
4	n/a	n/a	n/a

During the past year, in addition to sending emails via the OES Listserv, ODOT-OES provided various new guidance, clarification to existing guidance, and updated guidance at District Environmental Coordinator and Environmental Update Meetings, during NEPA Chats, at OTEC, and at the Civil Rights Symposium. LTAP continues to include updates in their quarterly newsletter. The most impactful changes include the updating and/or transition of all ODOT-OES Training Classes to an online format and several enhancements to EnviroNet.

Overall, the districts, ORDC, consultants, and LPAs have continued to improve and generally do what is asked of them as long as they are provided clear guidance. The ODOT Self-Assessment #3 and the FHWA Audit #3 identified several opportunities to improve ODOT's overall environmental performance. ODOT-OES brought these items to the attention of each district, ORDC, and OES staff and provided guidance and coaching regarding how to improve. ODOT-OES held discussions with the environmental staff in each district, at ORDC, and in ODOT-OES. All twelve Districts and the ORDC have shown steady and marked improvement in virtually every area over the last four years and are to be commended for their excellent work.

Conclusion:
The Self-Assessment demonstrated that that environmental documents prepared and approved during this review period were compliant with the MOU and assumed laws and regulations. Furthermore, all projects were approved at the appropriate document level and all corresponding NEPA activities were conducted in accordance with federal and state regulations. ODOT continues to monitor the NEPA Assignment Program and updates guidance and training as necessary. ODOT pays particularly close attention to areas needing improvement that were identified in previous Self-Assessments and Audits. We expect to continue to see a positive trend as we move from the Self-Assessments and Audits into Monitoring. ODOT continues to realize savings from the NEPA Assignment Program.

ODOT-OES would like to thank the ODOT-OES, ODOT District and ORDC Environmental staff. They have done an amazing job over the past 4 years and the entire environmental team should be commended for showing continuous improvement over this timeframe. They have performed extremely well under this program and FHWA has often commented about ODOT's excellent performance overall. Once this Self-Assessment and Audit process is closed out, ODOT will be entering a continuous and collaborative ODOT/FHWA monitoring of the NEPA Assignment program. ODOT-OES would also like to thank the FHWA for their support and hard work to make this program a success. ODOT would not have enjoyed the success of the NEPA Assignment Program without the support and guidance of the FHWA.