

DEPARTMENT OF TRANSPORTATION

DIVISION OF ENVIRONMENTAL ANALYSIS

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*Making Conservation
a California Way of Life.*

April 29, 2020

Ms. Emily Biondi
Director
Office of Project Development & Environmental Review
Federal Highway Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590-9898

Dear Ms. Biondi:

I am pleased to transmit the California Department of Transportation's (Caltrans) Monitoring Report under the Surface Transportation Project Delivery Program, which addresses performance during California State Fiscal Year 2018-19.

This report is prepared in accordance with the Project Delivery Program Memorandum of Understanding between the Federal Highway Administration and Caltrans, signed and effective December 23, 2016, as authorized by Title 23 U.S.C. 327, as amended by the Moving Ahead for Progress in the 21st Century Act, and continued under the Fixing America's Surface Transportation Act.

If you have any questions or concerns, please contact Scott Williams, at (916) 653-8369 or by email at scott.m.williams@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Philip J. Stolarski".

PHILIP J. STOLARSKI, Chief
Division of Environmental Analysis

Enclosure

Executive Summary

2019 Monitoring of Caltrans Performance under the Surface Transportation Project Delivery Program July 2018–June 2019

The California Department of Transportation (Caltrans) has prepared this report on monitoring of its performance, under the Surface Transportation Project Delivery Program (commonly known as the NEPA Assignment Program), pursuant to Section 10.2 of the 23 United States Code Section 327 (23 USC 327) memorandum of understanding (MOU) between the Federal Highway Administration (FHWA) and Caltrans. The 23 USC 327 MOU stipulates that Caltrans perform annual self-monitoring of its performance against four performance measures and 10 performance measure components, identified in the MOU, and transmit a report on the results of its monitoring to FHWA. This report documents the results of Caltrans' monitoring reviews of NEPA document approvals made from July 1, 2018 through June 30, 2019 (Quarters 45 through 48 of NEPA Assignment, referred to in this report as the 2019 monitoring period).

A major component of Caltrans' self-assessments and monitoring reviews has historically focused on strict consistency with internal tools and procedures that Caltrans developed upon entering the NEPA Assignment Pilot Program 11 years ago. These tools and procedures, including the environmental document annotated outlines, NEPA documentation checklists, quality control (QC) forms, and Uniform Filing System, were intended to ensure statewide consistency and "best practices" in the environmental analysis conducted and documentation prepared by Caltrans' staff under the Program. In determining consistency with these tools, Caltrans' monitoring reviews have focused on rigorous word-for-word consistency with the annotated outlines, accurate completion of every blank and check box on the checklists and forms, and environmental files that are 100% complete.

With 11 years of successful participation in the Program, Caltrans is evaluating whether these exacting monitoring reviews need to be adjusted based on the maturity of Caltrans' Program, Caltrans' proven abilities to prepare NEPA documents that meet federal environmental requirements, and Caltrans' staff extensive experience using the NEPA documentation tools. Caltrans is also considering the monitoring review procedures being used by other State Departments of Transportation that have more recently assumed NEPA Assignment.

Based on these considerations, Caltrans is shifting the focus of its monitoring reviews in a way that recognizes the maturity of the Program and also continues to ensure compliance with Section 8.2.6 of the 23 USC 327 MOU. This new approach to monitoring reviews will highlight the appropriateness of *substantive* determinations, findings, and approvals made in compliance with federal environmental regulations, rather than focus on strict consistency with Caltrans' internal tools and procedures. As internal tools continue to be important in aiding and training newer environmental staff and facilitating efficient senior staff QC

reviews, in 2019, Caltrans reviewed them for consistency with internal guidance, but irregularities that were found are identified as *non-substantive* findings. These *non-substantive* irregularities were not considered in measuring compliance with the MOU performance measures since they don't affect the soundness and validity of findings and conclusions made under federal regulations. Instead, irregularities in project documentation and in file-keeping, are reported to relevant district staff, together with reminders on best practices and where to find guidance on internal documentation and filing requirements.

Caltrans' 2019 findings are summarized in Table 1. Unlike previous years' monitoring reports, the compliance percentages in Table 1 are based on the *substantive* findings of the 2019 reviews, as measured against the four performance measures identified in Section 10.2 of the 2016 MOU.¹ The four performance measures are labeled A–D to correspond with their identifiers in the MOU (Table 1). Also listed in Table 1 are the “components” of each measure (labeled i, ii, and iii), as also identified in the MOU. Finally, Table 1 shows the measurable “metrics” associated with each component (labeled with Arabic numerals such as 1, 2, and 3).

Table 1 shows that Caltrans exceeded the performance goal for 19 of the 20 applicable metrics² related to the following general areas:

100% compliance achieved in 2019:

- Submittal of an annual monitoring report
- Documentation of compliance with federal environmental regulations
- Completion of legal sufficiency determinations
- Appropriate completion of quality assurance/quality control (QA/QC) procedures, including certification that public review comments on draft environmental documents have been appropriately addressed
- Consistency with the filing system protocols

98% compliance achieved in 2019:

- Signature on the internal certification form certifying consistency with the annotated outline: For one project, the internal QC form containing the preparer's signature was lost when the project was transferred to a new environmental generalist. Caltrans' staff confirmed that this document underwent a Caltrans-compliant QC review process despite the lack of a certifying signature on the internal form.

97% compliance achieved in 2019:

¹ In prior years, the compliance percentages shown in Table 1 were based on what are now identified as, *substantive* and *non-substantive* findings. Because of the maturity of the Program, Caltrans is now focusing on the *substantive* findings.

² Four metrics were determined not to be applicable in 2019. See Table 1.

- Consistency with the environmental document annotated outlines: Two environmental documents did not include the entirety of the NEPA Assignment language that is required by the 23 USC 327 MOU Section 3.2.6. One final environmental document cover and one Finding of No Significant Impact (FONSI) did not include this language. In both cases, the language provided was partially complete, but did not cite the MOU between FHWA and Caltrans. However, in both cases, the complete Section 3.2.6 language was included on the FONSI (in the case of the incomplete environmental document cover) and on the environmental document cover (in the case of the incomplete FONSI).

2019 ratings exceed the historical cumulative average rating for:

- Communications with resource agencies
- Quality of public meeting materials

Median time savings achieved in 2019:

- 14.3 median months saved for approval of FONSI.

The one metric for which the performance goal was not met is described below:

- Quality of public meetings, as evaluated by independent consultants who anonymously attend and review draft environmental document public meetings for ten criteria related to the quality of presentations, responses to public questions, visual aids, and handouts.

The performance goal for this metric is defined as equal to or above the cumulative historical average. For 2019, the rating was 4.3 or 0.2 points below the cumulative rating of 4.5. The 4.3 rating stems from only four meetings being reviewed and a relatively low average rating for one of the ten criteria that were evaluated, related to handouts. Two of the four meetings reviewed had no handouts and received a “neutral” rating for this criterion. Overall, the monitoring review shows that Caltrans effectively provided opportunities for the public to communicate their concerns on Caltrans’ projects and that Caltrans effectively addressed public comments.

This performance metric was originally developed to measure the change in communication between Caltrans and the public. As Caltrans evaluates ways to enhance the Program, it is assessing whether these subjective reviews of public meetings are the most efficient and effective way to measure communications with the public. A number of alternative approaches are being considered including the methods used by other NEPA Assignment States. For example, Texas Department of Transportation reviews this metric by evaluating the number of environmental complaints received, through its complaint telephone line and in correspondence, on its NEPA Assignment Program. Caltrans’ goal is to implement improvements, in the way this performance measure is evaluated, as part of the 2020 monitoring review.

For the twelve applicable percentage-based metrics³, Caltrans achieved an overall rating of 99.8% or approximately 5% over the goal of 95%. These monitoring results show that Caltrans is successfully carrying out the federal responsibilities assigned by FHWA, under the 23 USC 327 MOU, in accordance with all applicable federal laws and policies.

Caltrans' self-monitoring effort continues to find irregularities in its NEPA documentation, such as minor inconsistencies with the environmental document annotated outlines, QC review certification procedures, and environmental filing protocols. To address these inconsistencies, Headquarters will continue to work closely with district staff to train new environmental generalists; clarify and refine guidance, as needed; and provide ongoing reminders regarding areas that need improvement.

As Caltrans enters its 12th year in the NEPA Assignment Program, Caltrans' Division of Environmental Analysis (DEA) recently formed a NEPA Process Improvement Team to assess whether, and how, DEA can modify its policies and procedures to provide more efficiencies in achieving environmental approvals and in delivering projects. One of the team's current efforts is determining how monitoring reviews can be further improved to reflect Caltrans' experience in the Program, achieve greater participation by district staff, and provide more meaningful results that will improve environmental decision-making.

³ To identify the twelve percentage-based metrics, see those metrics with a 95% performance goal in the fifth column of Table 1, "Findings of the 2019 Monitoring Review".

Table 1. Caltrans 2019 Monitoring: Findings and Corrective Actions

Performance Measure ^a	Components of Measure ^a	Metric ^b	Findings of 2019 Monitoring Review	Performance Goal	Goal Met?	Corrective Action
A. Compliance with NEPA and other federal laws and regulations	A.i. Maintain documented compliance with procedures and processes set forth in the MOU for the environmental responsibilities assumed under NEPA Assignment	A.i.1. Percent of self-assessment reports submitted to FHWA	100% of the required self-assessment summary/ monitoring reports have been submitted to FHWA.	95%	Yes	None required
		A.i.2. Percentage of corrective actions identified in most recent self-assessment that have been implemented	Not applicable as all of the findings from last year’s 2018 monitoring review were for minor irregularities in documentation and were, therefore, “non-substantive” findings. As a result, corrective actions were not required in 2018.	95%	Not applicable	Not applicable
	A.ii. Maintain documented compliance with requirements of all federal laws and regulations being assumed (Section 106, Section 7, etc.)	A.ii.1. Percent of final environmental documents (FEDs) that contain evidence of compliance with requirements of Section 7, Section 106, and Section 4(f)	100% of the 30 reviewed FEDs appropriately documented compliance with requirements of Section 7, Section 106, and Section 4(f).	95%	Yes	None required
	(See note at the end of this table for explanation of italicized metrics)	A.ii.1.a. <i>Compliance with other Executive Order 11990; Executive Order 11988; and Section 176(c) of the federal Clean Air Act</i>	<i>100% of 30 reviewed FEDs appropriately documented compliance with Executive Orders 11990 and 11988 and Section 176(c).</i>	95%	Yes	None required
(See note at the end of this table for explanation of italicized metrics)	A.ii.1.b. <i>Compliance with 23 USC Sec.139 (Efficient Environmental Reviews for Project Decision-making)</i>	<i>100%. One reviewed final EIS appropriately documented compliance with 23 USC 139.</i>	95%	Yes	None required	

Table 1. Caltrans 2018 Monitoring: Findings and Corrective Actions (Continued)

Performance Measure ^a	Components of Measure ^a	Metric ^b	Findings of 2019 Monitoring Review	Performance Goal	Goal Met?	Corrective Action
	(See note at the end of this table for explanation of italicized metrics)	A.ii.1.c. <i>Compliance with Traffic Noise Analysis Protocol requirements</i>	<i>100% of 30 reviewed FEDs appropriately documented compliance with the Noise Protocol.</i>	95%	Yes	<i>None required</i>
	(See note at the end of this table for explanation of italicized metrics)	A.ii.1.d. <i>Appropriate Use of Categorical Exclusions</i>	<i>Not applicable since no 23 USC CEs were reviewed</i>	95%	<i>Not applicable</i>	<i>Not applicable</i>
	(See note at the end of this table for explanation of italicized metrics)	A.ii.1.e. <i>Appropriate use of 23 USC 326 versus 23 USC 327 Categorical Exclusions</i>	<i>Not applicable since no 23 USC CEs were reviewed</i>	95%	<i>Not applicable</i>	<i>Not applicable</i>
B. Attainment of supportable NEPA decisions	B.i.a. Legal sufficiency determinations made by counsel (FEISs and individual Section 4(f) determinations)	B.i.a.1. Percent of final EISs and individual Section 4(f) determinations with legal sufficiency determinations completed prior to environmental document approval	100%. One final EIS and one individual Section 4(f) evaluation had legal sufficiency determinations.	95%	Yes	None required
B.i. Maintain internal quality control and assurance measures and processes, including a record of:	B.i.b. Compliance with Caltrans environmental document content standards and procedures	B.i.b.1. Percentage of internal QC certification forms certifying consistency with annotated outline	98% or 57 of 58 DEDs and FEDs had internal certification forms with certification signatures that the documents were reviewed by the environmental document preparer for consistency with the applicable SER annotated outline.	95%	Yes	Caltrans discussed this finding with district managerial staff to ensure that they understand the QC requirements and provided additional training on uploading key documents, such as the QC certification forms, to the STEVE Supercontainer.

Table 1. Caltrans 2018 Monitoring: Findings and Corrective Actions (Continued)

Performance Measure ^a	Components of Measure ^a	Metric ^b	Findings of 2019 Monitoring Review	Performance Goal	Goal Met?	Corrective Action
		B.i.b.2. Percentage of sampled environmental documents that followed applicable annotated outline	97% or 56 of 58 reviewed DEDs and FEDs followed the annotated outlines in terms of chapter and section organization. One environmental document cover and one FONSI failed to include the entirety of the NEPA Assignment language required by the 23 USC 327 MOU Section 3.2.6.	95%	Yes	Caltrans will discuss this finding with affected project staff to ensure that they understand Section 3.2.6 of the 23 USC 327 MOU requires the inclusion of NEPA Assignment language on the cover page of each environmental assessment, FONSI, environmental impact statement, and Record of Decision.
		B.i.b.3. Percentage of DEDs and FEDs for which the completed QA/QC procedures are appropriately completed based on an independent review of the internal QC certification form and follow-up information	100% of 58 reviewed DEDs and FEDs properly implemented and documented QC procedures	95%	Yes	None required
		B.i.b.4. Percent of DEDs and FEDs with completed checklists	100% of 58 reviewed DEDs and FEDs had complete checklists.	95%	Yes	None required
	B.i.c. Documentation of project records for projects under the NEPA Assignment Program	B.i.c.1. Percent of sampled EA/EIS project files organized according to the established filing system	100% of 24 reviewed files conformed to Uniform Filing System (UFS) requirements.	95%	Yes	None required
C. Monitor relationships with agencies and the general public (effectiveness of relationships with	C.i. Assess change in communication among Caltrans, federal and state resource agencies, and the public	C.i.1. Resource Agency Survey: Compare average evaluation ratings for each period and cumulatively over time	82% cumulative average of positive responses	Equal to or above cumulative average of 74% positive responses since first survey in 2009	Yes	None required

Table 1. Caltrans 2018 Monitoring: Findings and Corrective Actions (Continued)

Performance Measure ^a	Components of Measure ^a	Metric ^b	Findings of 2019 Monitoring Review	Performance Goal	Goal Met?	Corrective Action
agencies and the general public)		C.i.2. Public Meeting Material Review: Compare average evaluation ratings for each self-assessment period and cumulatively over time	4.7 cumulative average rating	Equal to or above cumulative average rating of 4.6 (out of 5.0) since 3 rd Self-Assessment	Yes	None required
		C.i.3. Anonymous Third-Party Public Meeting Review: Compare average evaluation ratings for each self-assessment period and cumulatively over time	4.3 cumulative average rating	Equal to or above cumulative average rating of 4.5 (out of 5.0) since 4 th Self-Assessment	No	None required
	C.ii. Maintain effective responsiveness to substantive comments received from the public, agencies, and interest groups on NEPA documents	C.ii.1. Percentage of signed final document internal QC certification forms in file with public review comments box checked	100% of 30 reviewed FEDs had QC certification forms that indicated that public review comments had been appropriately addressed.	95%	Yes	None required
	C.iii. Maintain effective NEPA conflict resolution processes whenever appropriate	C.iii.1. Date that formal conflict resolution action began to date resolution reached	No formal conflict resolution actions were required during the 2018 monitoring review period.	Not applicable	Not applicable	Not applicable
D. Timely completion of NEPA process	D.i. Compare time to completion for environmental document approvals before and after Assignment (July 1, 2007)	D.i.1. For SHS and Local Assistance projects, compare median time from begin administrative DED QC process to DED approval before and after assignment	3.1 (draft EAs) and 3.3 (draft EISs) median months saved	Any savings in time as compared to pre-NEPA Assignment	Yes	None required

Table 1. Caltrans 2018 Monitoring: Findings and Corrective Actions (Continued)

Performance Measure ^a	Components of Measure ^a	Metric ^b	Findings of 2019 Monitoring Review	Performance Goal	Goal Met?	Corrective Action
		D.i.2. For SHS and Local Assistance projects, compare median time from begin administrative FED QC process to FED approval before and after assignment	0.8 (FONSIs) and 4.1 (final EISs) median months saved	Any savings in time as compared to pre-NEPA Assignment	Yes	None required
		D.i.3. Compare median time from begin environmental studies/NOI to DED approval before and after assignment	11.6 (draft EAs) and 25.4 (draft EISs) median months saved	Any savings in time as compared to pre-NEPA Assignment	Yes	None required
		D.i.4. Compare median time from begin environmental studies/NOI to FED approval before and after assignment	14.3 (FONSIs) and 124.1 (final EISs) median months saved	Any savings in time as compared to pre-NEPA Assignment	Yes	None required
	D.ii. Compare time to completion for key interagency consultations formerly requiring FHWA participation before and after Assignment (July 1, 2007)	D.ii.1. Compare median time from submittal of biological assessments to receipt of biological opinions before and after assignment	5.0 median months saved	Any savings in time as compared to pre-NEPA Assignment	Yes	None required

Explanation of italicized metrics: In addition to the metrics developed in conjunction with FHWA (see footnote “b” below), Caltrans also measures and reports on performance of five additional metrics that are related to specific federal environmental regulations. These additional metrics broaden the review of compliance with federal requirements with additional regulations that protect specific sensitive environmental resources. These metrics are identified as A.ii.1.a–e.

^a The four performance measures listed in this table are identified in Section 10.2 of the 2016 MOU (labeled A–D to correspond with their identifiers in the MOU). The 2016 MOU also identifies the “components” of each measure (labeled i, ii, and iii consistent with the MOU).

^b The “metrics”, associated with each component (labeled with Arabic numerals such as 1, 2, 3 etc.), were developed in discussions with FHWA and have been evaluated consistently each year under NEPA Assignment.

Report on 2019 Monitoring of Caltrans Performance under the Surface Transportation Project Delivery Program

July 1, 2018–June 30, 2019

Scope of Monitoring

During the 2019 monitoring effort, Caltrans evaluated all NEPA documents that were approved statewide during the July 1, 2018 through June 30, 2019 monitoring period. Caltrans also physically inspected the environmental files for those projects approved in Districts 7, 11, and 12.

A total of 58 approvals for State Highway System and Local Assistance projects were reviewed against each of the four performance measures, 10 performance measure components, and associated performance metrics (see Table 1). These 58 approvals are identified below by NEPA class of action:

- 28 Environmental Assessments (EAs)
- 29 Findings of No Significant Impact (FONSIs)
- One final Environmental Impact Statement (EIS)

Districts 7, 11, and 12 that were visited for this monitoring review, did not approve any 23 USC 327 Categorical Exclusions (CE), and, therefore, no 23 USC 327 CE files were reviewed for the 2019 monitoring period.

Caltrans also conducted a program-level review of the NEPA Assignment Program to determine if environmental document guidance, policies, tools, and training are up-to-date.

Monitoring Methods

The monitoring findings are based on Caltrans' progress toward meeting performance metrics that Caltrans identified in collaboration with FHWA. Caltrans also measured the performance of five additional metrics, identified in italicized print and labeled *1a*, *1b*, *1c*, *1d*, and *1e* in Table 1, which are related to specific federal environmental regulations. These additional metrics broaden the review of compliance with federal requirements with additional regulations that protect specific sensitive environmental resources.

Substantive and Non-Substantive Findings

During the 2019 monitoring effort, Caltrans identified two categories of findings:

- **Substantive findings:** Substantive findings are the focus of the monitoring reviews and are made for deficiencies related to compliance with federal environmental regulations or

other federal documentation or procedural requirements. Examples of substantive findings could include:

- Failure to obtain an air quality conformity determination prior to NEPA approval, or
- Failure to obtain written concurrence for a Section 4(f) de minimis finding from the agency with jurisdiction over the Section 4(f) resources, or
- Failure to document a Wetlands Only Practicable Alternative Finding for a project that would result in permanent impacts to jurisdictional wetlands.

Corrective actions would be identified for substantive findings. Corrective actions for project-specific findings typically involve completion of a revalidation form that corrects the deficient documentation.

Substantive findings would be quantified in calculating the compliance percentages and determining whether the performance metric goals were met.

- **Non-Substantive findings:** Non-substantive findings are also identified for irregularities in documentation or in implementing procedures per Caltrans' requirements such as:
 - Minor deviations or inconsistencies with the environmental document annotated outlines appear in approved environmental documents. For example, a conclusion in an environmental document does not correspond exactly, word-for-word, with the conclusory language found in the annotated outline, but the meaning of the conclusion is consistent with the meaning found in the annotated outline;
 - Irregularities in completing checklists that provide supporting documentation for Caltrans' decisions. For example, the Air Quality Conformity Checklist is not completely filled out for a project, but an FHWA conformity determination is obtained or a finding is documented that a project is exempt from having to make a conformity determination;
 - Projects follow the required QC review and certification procedures, but the projects' QC documentation incorporates minor irregularities. For example, a check box is left blank on the certification form even though the review was completed;
 - Project environmental files are organized according to Caltrans' Uniform Filing System (UFS) requirements, but not all final documents that were prepared were placed in the environmental file. For example, cultural resources reports were placed in the cultural resources specialists' files rather than the administrative files maintained by the environmental generalist.

In previous monitoring reviews, Caltrans had counted these irregularities as “deficiencies” since the focus of monitoring had been strict consistency with Caltrans’ internal NEPA documentation and QC tools and procedures.

Rigorous conformance with these tools and procedures was important, early-on, to achieve statewide consistency in NEPA documentation, as Caltrans began participation in the Pilot Program. Given the 11 years of experience that Caltrans has with NEPA Assignment, beginning with the 2019 monitoring review, Caltrans is shifting the focus of the monitoring reviews to the appropriateness of *substantive* determinations, findings, and approvals made in compliance with federal environmental regulations.

Reminders for district project staff, which clarify Caltrans’ requirements, are typically provided for non-substantive findings. The purpose of these reminders is to ensure that the irregularities are not repeated in subsequent environmental documentation that is prepared. The reminders include identifying where in the Standard Environmental Reference the related guidance can be found and an explanation of the guidance.

Non-substantive findings were not quantified in calculating the compliance percentages.

The methods used in evaluating each of the four performance measures, identified in the 23 USC 327 MOU, are described below.

A. Compliance with NEPA and other Federal Laws and Regulations

Compliance with this performance measure was judged by the following:

- Determination if all self-assessment and monitoring reports, prepared by Caltrans, have been submitted to FHWA;
- Review of 30 final environmental documents approved statewide against specific review elements related to the following regulations, in order to determine whether the documentation and processes used were appropriate and complete:
 - Section 7 of the Federal Endangered Species Act (FESA)
 - Section 106 of the National Historic Preservation Act (NHPA)
 - Section 4(f) of the U.S. Department of Transportation Act
 - Section 176(c) of the Clean Air Act
 - Executive Order 11990, Protection of Wetlands
 - Executive Order 11998, Floodplain Management
 - Caltrans Traffic Noise Analysis Protocol
- Review of one final EIS against specific review elements related to 23 CFR 139 (Efficient Environmental Reviews for Project Decision-Making); the review of this regulation is conducted by reviewing the project file, and therefore, only EISs approved in the districts that were visited are subject to this review.

B. Attainment of Supportable NEPA Decisions

This performance measure was evaluated based on confirming that the following requirements were met for NEPA approvals during the 2019 monitoring period:

- Legal sufficiency determinations for one final EIS and one final individual Section 4(f) evaluation;
- Consistency in the organization and environmental topics evaluated in 58 approved draft and final environmental documents, as compared to the requirements of Caltrans' environmental document annotated outlines;
- Implementation of Caltrans' QC review procedures for 58 draft and final environmental documents; and
- Review of 24 environmental files (all approved documents and a sample of projects with draft environmental documents in preparation) for consistency with Caltrans' UFS requirements.

C. Monitor Relationships with Agencies and the Public

Agencies

Caltrans conducted a survey of state and federal resource agencies to assess whether the relationships between Caltrans and resource agencies have remained consistent or have changed since initiation of NEPA Assignment. Of the 67 resource agency staff who were invited to participate in this survey, 23 (34 percent) responded to the survey and were polled regarding Caltrans' effectiveness as the NEPA lead agency.

Public

To monitor relationships with the public, Caltrans conducted the following two reviews related to draft environmental document public review meetings:

- Reviews of materials, including meeting notifications and presentation materials, for 17 public review meetings, and
- Caltrans' performance at four public review meetings as evaluated by independent consultant reviewers.

D. Timely Completion of NEPA Process

Caltrans calculated the median number of months it is taking to review and approve environmental documents under NEPA Assignment, as compared with FHWA timeframes for review and approval prior to NEPA Assignment (See Tables 3 and 4).

Program-Level Review

For the program-level review, Caltrans reviews its Standard Environmental Reference (SER) to identify the updates and improvements made to NEPA guidance, policies, and tools, and to evaluate the effectiveness of its NEPA Assignment training plan by determining whether planned training sessions were actually provided. A new program initiated by DEA will also be described in the Program-Level Review section.

2019 Findings

This section summarizes the *substantive* and *non-substantive* findings from the 2019 monitoring review. Caltrans did not find any *substantive* deficiencies. *Non-substantive* findings are narratively discussed under each relevant metric. The project-specific *non-substantive* findings were communicated to all affected environmental staff, and reminders were provided identifying the reason for the inconsistency and the related guidance.

The compliance percentage, relative to the metric's performance goal, is identified in parentheses in the bolded metric titles below. These compliance percentages are based on the *substantive* findings for 2019 and reflect whether deficiencies, related to compliance with federal environmental regulations or other federal documentation or procedural requirements, were found.

A. Compliance with NEPA and Other Federal Laws and Regulations

A.i.1. Percentage of Monitoring Reports Submitted (100%): One hundred percent of required self-assessment and monitoring reports have been submitted to FHWA. The reports from the last three years are available on the Caltrans Division of Environmental Analysis website, and earlier reports are available upon request.

A.i.2. Percentage of Identified Corrective Actions Implemented (Not Applicable)

All of the findings from last year's 2018 monitoring review were for minor irregularities in documentation, and were, therefore, *non-substantive* findings. As a result, corrective actions (that are required for *substantive* findings) were not required.

A.ii.1. Compliance with Sections 7, 106, and 4(f) (100%)

Caltrans did not find any *substantive* deficiencies in its review of Section 7, 106, or 4(f) findings/determinations or procedures. Federal documentation and procedural requirements were adhered to.

A number of *non-substantive* documentation irregularities were found in the reviewed final environmental documents, including the following:

- **Section 7:** For all reviewed environmental documents, the Section 7 consultation processes were implemented, and letters of concurrences and Biological Opinions were

obtained from the resource agencies, as appropriate. However, a number of minor documentation irregularities were found including the following:

- Species lists were obtained, but not placed in the final environmental documents;
 - Species lists found in environmental document were more than 180 days old from the approval date of the final environmental document;
 - Language was included in the environmental documents that erroneously stated that a project area was outside of the jurisdiction of the National Marine Fisheries Service (NMFS). Although these projects were technically located within the area of jurisdiction of one of NMFS' offices, these projects had "No Effect" findings on NMFS-listed species;
 - In making a Section 7 "No Effect" finding on listed species, the conclusions were made using words such as "no impact";
 - "No Effect" findings were not explicitly made for every applicable species on the species lists.
- **Section 106:** For all reviewed documents, the procedural requirements of Section 106 were implemented. However, the following irregularities were found:
 - A few documents did not contain a Cultural Resources section and instead included the "No Historic Properties Affected" findings in the section of the environmental document addressing environmental topics that were dismissed from further consideration;
 - "No Adverse Effect" findings were made without specifying "With Standard Conditions" or "Without Standard Conditions"⁴;
 - A State Historic Preservation Officer concurrence letter was obtained, but it was not included in the final environmental document
 - **Section 4(f):** A temporary occupancy exception concurrence letter was obtained, but it was not placed in the environmental document. A few documents reported the absence of Section 4(f) parks and recreational facilities using language that was inconsistent with the language in the annotated outlines.

A.ii.1a. Compliance with Executive Order 11990, Executive Order 11988, and Section 176(c) of Federal Clean Air Act (100%)

Caltrans did not find any *substantive* deficiencies in its review of findings/determinations made and procedures conducted for compliance with Executive Order 11990, Executive Order 11988, and air quality conformity requirements.

⁴ The latest environmental document annotated outlines require specifying a Finding of No Adverse Effect with Standard Conditions or a Finding of No Adverse Effect.

A number of *non-substantive* documentation irregularities were found in the reviewed final environmental documents, related to the following areas:

- **Executive Order 11990:** A few documents did not include exhibits supplementing the technically-accurate narrative description of the location of jurisdictional waters. Such exhibits are required by the annotated outlines, but their absence did not affect the conclusions made regarding jurisdictional waters.
- **Executive Order 11988:** The reviewed environmental documents made findings, as required by this executive order. However, the language used in describing whether a project was located in 100-year floodplain was not always clear. Also, some conclusions of “no significant encroachment” on a 100-year floodplain were made using language that did not exactly conform with the annotated outlines.
- **Section 176(c):** A discussion describing that a project was exempt from having to make a conformity determination was absent in an environmental document. One check box was erroneously checked in completing one project’s Air Quality Conformity Checklist, but the error did not affect the conclusion made with regard to conformity. Another project did not have a completed Conformity Checklist, but the requirements of Section 176(c) were met, nevertheless.

A.ii.1.b. Compliance with 23 USC Sec.139 (100%)

Caltrans did not find any *substantive* deficiencies in its review of one final EIS for compliance with 23 USC Section 139.

A.ii.1.c. Traffic Noise Analysis Protocol (100%)

Caltrans did not find any *substantive* deficiencies or *non-substantive* irregularities in the documentation prepared under 23 CFR 772.

A.ii.1.d and e. Categorical Exclusions (Not Applicable)

For this monitoring review, Districts 7, 11, and 12 did not approve any 23 USC 327 CEs, and, therefore, none were reviewed.

B. Attainment of Supportable NEPA Decisions

B.i.a.1. Legal Sufficiency Determinations (100%)

Both the final EIS and Section 4(f) evaluation had legal sufficiency determinations prior to NEPA approval.

B.i.b.1. Certifications for Consistency with Annotated Outlines (98%)

This metric relates to whether the internal QC certification forms are signed by the project environmental document preparer, certifying that the documentation was prepared consistent with the environmental document annotated outlines. With the exception of the certification form for one document, all reviewed forms contained this required signature. This

environmental document was transferred from one environmental generalist to another generalist during the review and approval process. The internal QC form was signed by the original generalist, but the form was lost when the project was transferred. Even though the file for this project lacks an internal QC form with a generalist signature, Caltrans staff has confirmed that this project underwent a Caltrans-compliant QC review process.

B.i.b.2. Consistency with Annotated Outlines (97%)

With the exception of two environmental documents, all reviewed environmental documents were generally consistent with the organization and coverage of topics required by the annotated outlines. Both documents that were inconsistent with the annotated outlines did not include the entirety of the NEPA Assignment language that is required by the 23 USC 327 MOU Section 3.2.6. One final environmental document cover and one FONSI did not include this language. In both cases, the language provided was partially complete, but did not cite the MOU between FHWA and Caltrans. However, in both cases, the complete Section 3.2.6 language was included elsewhere in the document, that is on the FONSI (in the case of the incomplete environmental document cover) and on the environmental document cover (in the case of the incomplete FONSI).

In addition to these deficiencies, minor irregularities were also found, as described below. These irregularities didn't alter the conclusions made under NEPA and other federal environmental regulations:

- The Table of Contents of a number of environmental document did not conform with the annotated outline.
- Environmental topics that were not pertinent to projects were not specifically dismissed in the environmental documents per the annotated outline.
- Although not a requirement of the 23 USC 327 MOU, the annotated outlines require that a description of the NEPA Assignment Program be placed at the beginning of the Project Description or Summary Chapter of each environmental document. Not all reviewed environmental documents included this language.

B.i.b.3. Proper Implementation of Environmental Document Quality Control Requirements (100%)

All approved draft and final environmental documents were QC reviewed according to Caltrans' procedures. The irregularities that were found, as described below, didn't alter the conclusions made under NEPA and other environmental regulations:

- Some of the reviewed certification forms had missing certification signatures or boxes were not checked, but the project generalists confirmed that all of the required QC reviews had occurred.
- The date of the Environmental Branch Chief certification signature pre-dated the technical editor's signature on an internal certification form.

- The NEPA QC reviewers reviewed the environmental documents prior to the documents' approvals, but they did not sign and date the certification forms until after the documents were signed. This same situation also occurred with a technical editor review that occurred prior to the approval of the document, but the editor did not sign the internal certification form until after the document was signed.

B.i.b.4. Completed Environmental Document Checklist (100%)

All reviewed environmental documents had completed checklists.

B.i.c.1. Files Organized According to the Established Filing System (100%)

All reviewed electronic and hard-copy filing systems were generally organized consistent with the UFS. As in previous monitoring reviews, NEPA documentation that had been completed and agency concurrences that had been obtained had not been placed in the hard-copy environmental files, but District staff were directed to place missing documentation into the files.

C. Monitor Relationships with Agencies and the General Public

This performance measure is evaluated based on three performance metrics: (1) ratings provided by the resource agencies with whom Caltrans partners; (2) ratings of materials used at public meetings; and (3) ratings of Caltrans' performance at public meetings.

C.i.1. Average Evaluation Ratings from Resource Agency Surveys (82% versus a goal of 74% or higher)⁵

Figure 1 shows the percentage of Resource Agency Survey respondents who rated Caltrans favorably for the following 10 qualities:

- Capable of assuming FHWA's NEPA responsibilities
- Responsiveness
- Listening skills
- Consultation efficiency
- Quality
- Conscientiousness in adhering to federal laws
- Cooperativeness on existing programmatic agreements and MOUs
- Interagency coordination
- Consideration of resource agency mission

⁵ As described in the 2018 Monitoring Report, a number of changes were made to the resource agency survey and assessment methods in 2018 to improve the effectiveness of the survey and usefulness of the survey results. The 2019 results reflect these changes.

- Timeliness

Favorable responses include the following:

- Answers of “yes” (but excludes answers of “no”) on questions regarding whether Caltrans possesses a specified quality;
- Answers of “strongly agree”, or “somewhat agree” (but excludes answers of “neither agree nor disagree”, “somewhat disagree”, or “strongly disagree”) to questions asking if Caltrans possesses a specified quality;
- Ratings of “excellent”, “very good”, or “good” (but excludes ratings of “average” and “poor”) relative to a specified quality.

The goal for this metric is that the average 2019 percentage of favorable responses for all 10 qualities is equal to or exceeds the cumulative average percentage of favorable responses received for all qualities during the surveys undertaken between 2009 and 2019. During the 2019 monitoring period, Caltrans had an average of 82 percent favorable responses for all questions, as compared to 74 percent for 2009-2019. Therefore, Caltrans exceeded the cumulative average rating and has exceeded its 2019 goal for this metric.

C.i.2. Average Evaluation Ratings from Review of Public Meeting Materials (4.7 versus a goal of 4.6 or higher)

Figure 2 shows the average ratings for materials that were used for 17 public meetings held for projects with draft environmental document approvals during the 2019 monitoring period. The following qualities were rated:

- Public notice met SER requirements.
- Adequate opportunities for public to provide comments were available.
- Appropriate specialized Caltrans staff were available to discuss project purpose and need, alternatives, and project impacts.
- Display materials depicting project alternatives were easy to understand.
- Display materials depicting project impacts were easy to understand.
- Meeting was accessible.

The ratings were based on the following five-point scale:

1. Disagree strongly
2. Disagree somewhat
3. Neutral
4. Agree somewhat
5. Agree strongly

The goal for this metric is that the average 2019 rating for all questions is equal to or exceeds the cumulative average rating for all questions for the surveys conducted between 2008 and 2019. In 2019, Caltrans achieved an average rating of 4.7 for all questions, as compared to a cumulative average rating of 4.6 for 2008–2019. Therefore, in 2019, Caltrans exceeded the cumulative average rating and has exceeded its goal in this area.

C.i.3. Average Evaluation Ratings for Anonymous Third-Party Public Meeting Review (4.3 versus a goal of 4.5 or higher)

Figure 3 presents the average ratings of anonymous, independent consultants who attended four draft environmental document public meetings during the 2019 monitoring period. The consultants reviewed the performance of Caltrans’ district staff at these meetings in the following areas (using the same 5-point scale as described above for the public meeting materials review):

- Handouts provided clear information and were understandable to the public.
- Visual aids were beneficial.
- Information needed to understand the project was provided.
- Project staff conveyed their knowledge effectively.
- Project staff responded effectively to questions.
- Project staff treated participants with courtesy and respect.
- Meeting was valuable.
- Meeting was an overall positive experience.

The goal for this metric is that the average 2019 monitoring rating equals or exceeds the cumulative average rating of the reviews that were conducted between 2009 and 2019. In 2019, Caltrans achieved an average rating of 4.3 for all questions, as compared to an average cumulative rating of 4.5 between 2009 and 2019. Therefore, Caltrans did not meet this performance goal in 2019. The 4.3 rating stems from only four meetings being reviewed and a relatively low average rating for one of the ten criteria that were evaluated, related to handouts. Two of the four meetings reviewed had no handouts and received a “neutral” rating for this criterion. In general, the monitoring review shows that Caltrans effectively provided opportunities for the public to communicate its concerns on Caltrans’ projects and addressed public comments.

Caltrans is currently evaluating whether anonymous reviews of public meetings are the most efficient and effective way to measure Caltrans’ communications with the public. A number of alternative approaches for measuring Caltrans’ relationships with the public are being evaluated. Caltrans’ goal is to implement improvements in the way that communications with the public are measured as part of the 2020 monitoring review.

C.ii.1. Percentage of Signed Final Document QC Forms with Public Review Comments Box Checked (100%)

C.iii.1. Date that Formal Conflict Resolution Action Began to Date Resolution Reached (Not Applicable)

No formal conflict resolution action has been initiated on any NEPA Assignment project.

D. Timely Completion of NEPA Process

Review of the four timeliness metrics, as described below, indicates that Caltrans achieved a substantial time savings for each measured environmental milestone.

D.i.1. Draft Environmental Document Review and Approval Median Time Frames

Caltrans achieved a savings of 3.1 (draft EA) and 3.3 (draft EIS) months in the median time that it took to review and approve draft environmental documents that were approved through the 2019 monitoring period, as compared to the baseline of pre-NEPA Assignment approvals by FHWA. These time savings are shown in the first and third rows of Table 2 below.

Table 2. Environmental Document Review and Approval Time Savings

Milestone	Median Timeframe in Months (Number of Projects)		Median Time Savings in Months
	Pre-NEPA Assignment Program Projects	NEPA Assignment Program Projects Through June 2019	
Begin QC of administrative draft EA to draft EA approval	5.4 (29)	2.3 (244)	3.1
Begin QC of administrative final EA to FONSI approval	2.5 (22)	1.6 (227)	0.8
Begin QC of administrative draft EIS to draft EIS approval	9.3 (8)	6.0 (22)	3.3
Begin QC of administrative final EIS to final EIS approval	9.9 (4)	5.8 (21)	4.1

D.i.2. Final Environmental Document Review and Approval Median Time Frames

As shown in the second and fourth rows of Table 2, Caltrans also achieved savings of 0.8 (FONSI) and 4.1 (final EIS) months in the median time that it took to review and approve final environmental documents.

D.i.3. Draft Environmental Document Preparation Median Time Frames

Caltrans achieved savings of 11.6 (draft EA) and 25.4 (draft EIS) months in the median time that it took to prepare draft environmental documents approved through the 2019 monitoring period, as compared to the FHWA baseline (Table 3).

Table 3. Environmental Document Preparation Time Savings

Milestone	Median Timeframe in Months (Number of Projects)		Median Time Savings in Months
	Pre-NEPA Assignment Program Projects	NEPA Assignment Program Projects Through June 2019	
Begin environmental studies to draft EA approval	42.3 (31)	30.7 (257)	11.6
Begin environmental studies to FONSI approval	54.1 (31)	39.8 (226)	14.3
Notice of Intent to draft EIS approval	69.9 (8)	44.4 (22)	25.4
Notice of Intent to final EIS approval	193.9 (5)	69.8 (19)	124.1

D.i.4. Final Environmental Document Preparation Median Time Frames

Caltrans also achieved savings of 14.3 (FONSI) and 124.1 (final EIS) months in the median time that it took to prepare final environmental documents (Table 3).

D.ii.1. Section 7 Consultation Median Time Frames

Table 4 shows the median time savings that has been achieved for Section 7 FESA formal consultations. Caltrans has achieved a savings of 5.0 months for the past 12 years of the NEPA Assignment Program as compared to pre-NEPA Assignment consultations.

Table 4. Section 7 Consultation Time Savings

Milestone	Median Timeframe in Months (Number of Biological Opinions)		Median Time Savings in Months
	Pre-NEPA Assignment Program Projects	NEPA Assignment Program Projects Through June 2019	
Submittal of Section 7 documentation to resource agency to Biological Opinion	11.0 (25)	6.0 (159)	5.0

Program-Level Review

Improved Guidance: Standard Environmental Reference Updates

Caltrans continues to update the SER, Local Assistance Procedures Manual, and the NEPA Assignment external and internal website pages to clarify NEPA Assignment requirements, as needed. The most notable updates to the SER that addressed findings during this monitoring period included the following:

Forms and Templates

- Updates to the Air Quality Conformity Checklist
- Updates to the CE Checklist to incorporate changes related to MAP-21 and the FAST Act and to reflect the most recent dollar amounts for CEs under 23 CFR 771.117(c)(23);

Volume 1 of the SER

- Updates to Chapter 1, “Federal Requirements”, to include a link to FHWA’s Environmental Review Toolkit “One Federal Decision” page;
- Updates to Chapter 32, “Environmental Impact Statement”, to reflect changes to 23 USC 139 process by both the FAST Act and Executive Order 13807 (One Federal Decision);
- Updates to Chapter 38, “NEPA Assignment”, including provision of a link to FHWA’s new guidance for submitting Statute of Limitations to the Federal Register;

Other Guidance

- Updates to the Fact Sheet for Transportation Conformity Requirements for NEPA CEs
- Issuance of a new Fact Sheet on “Different Types of Caltrans Projects”

Training

The FY 2018-19 Caltrans NEPA Assignment Training Plan identified all training courses to be offered to Caltrans environmental staff and technical specialists on an as-needed basis during the fiscal year. These courses included 17 live training sessions that were to be offered one or more times and two on-line courses. All courses identified were delivered except for Air Quality Basics, and Traffic Noise Modeling due to staffing workload.

Caltrans regularly reviews the results of course evaluations submitted by participants and trainers and revises and/or augments course content in response to comments received.

NEPA Process Improvement Team

In October 2019, DEA kicked off a NEPA Process Improvement effort. The purpose of this effort is to review DEA’s current procedures and policies under NEPA and other federal environmental regulations, and other State Department of Transportation’s implementation of NEPA to determine, whether, and how, DEA can modify its procedures and policies to provide more efficiencies and flexibilities in the delivery of federal-aid projects. A core team of DEA Managers and selected District Environmental Chiefs has been formed to make recommendations to DEA Management and District Environmental Deputies in mid-2020. The core team is currently evaluating the 23 USC 327 monitoring review procedures, Caltrans’ environmental document QC review procedures, CE documentation, and the environmental document annotated outlines to determine if these processes and tools can be improved and made more efficient.

Statement by Chief, Division of Environmental Analysis

Based on Caltrans' monitoring of its performance, during FY 2018-2019, under the Surface Transportation Project Delivery Program, I find the responsibilities assumed by Caltrans under the 23 USC 327 MOU are being carried out in accordance the MOU and all applicable federal laws and policies.

Signed:

Philip J. Stolarski
Chief, Division of Environmental Analysis
California Department of Transportation

Date:

Figure 1
2019 Resource Agency Survey Results¹

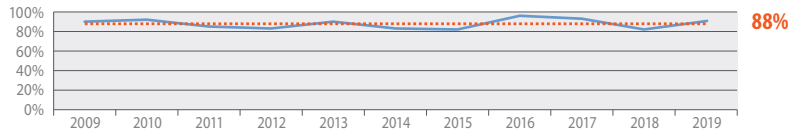
1,2

All questions combined: Cumulative average percentage (2009-2019) – 75%
Cumulative average percentage (2019) – 82%

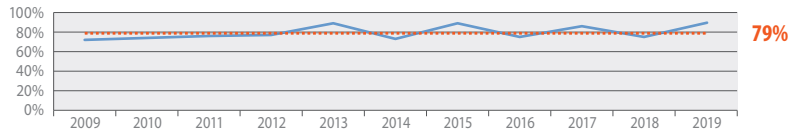
Legend

— Average by year
 Cumulative average (2009-2019)

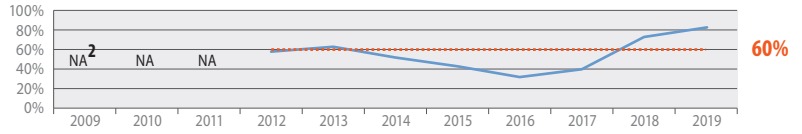
2a. Has Caltrans adequately assumed the NEPA responsibilities of FHWA?
 1 = YES



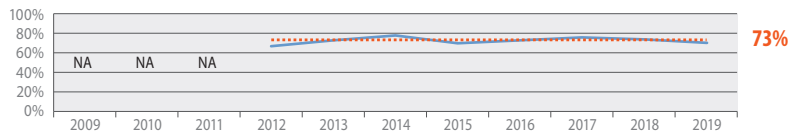
2b. Caltrans is responsive to the concerns expressed by your agency.
 5 = STRONGLY AGREE; 4 = SOMEWHAT AGREE



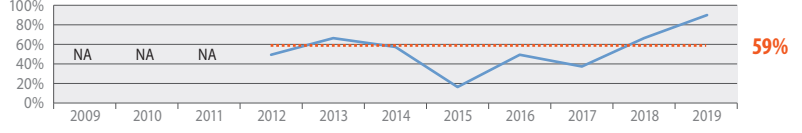
2c. Caltrans listens as well to resource agencies as does other federal NEPA lead agencies.
 5 = STRONGLY AGREE; 4 = SOMEWHAT AGREE



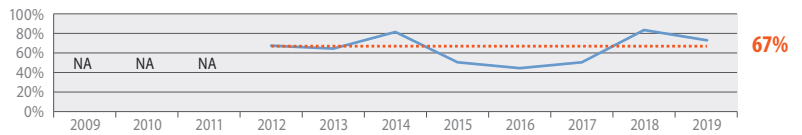
2d. The NEPA and consultation processes are efficient under Caltrans.
 5 = STRONGLY AGREE; 4 = SOMEWHAT AGREE



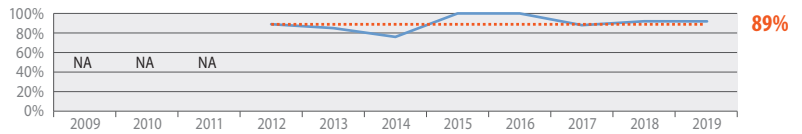
2e. Quality has not suffered without oversight by a federal NEPA lead agency.
 5 = STRONGLY AGREE; 4 = SOMEWHAT AGREE



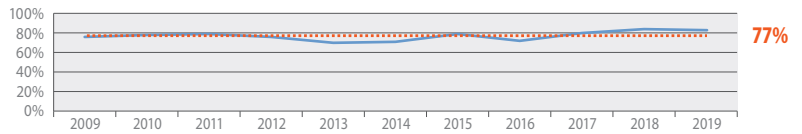
2f. Caltrans has been as conscientious in adhering to federal laws, rules, and regulations as other federal NEPA lead agencies.
 5 = STRONGLY AGREE; 4 = SOMEWHAT AGREE



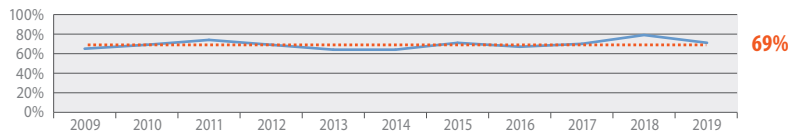
2g. Has Caltrans been cooperative in implementing existing programmatic agreement(s) and memorandum(a) of understanding with your agency?
 1 = YES



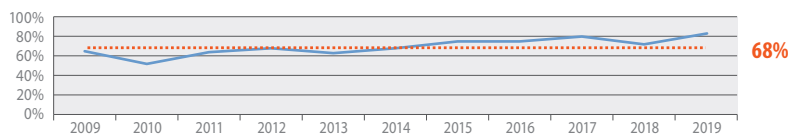
2h. Currently, how would you rate how well interagency coordination is working between Caltrans and your agency with respect to consultation and coordination responsibilities on NEPA Assignment projects under NEPA and other federal environmental laws?
 5 = EXCELLENT; 4 = VERY GOOD; 3 = GOOD



2i. Currently, how would you rate how well your agency's mission is being considered and met with respect to Caltrans' consultation and coordination responsibilities on NEPA Assignment projects under NEPA and other federal environmental laws?
 5 = EXCELLENT; 4 = VERY GOOD; 3 = GOOD



2j. Currently, how would you rate the timeliness in which project resolutions are being reached with respect to Caltrans' consultation and coordination responsibilities on NEPA Assignment projects under NEPA and other federal environmental laws?
 5 = EXCELLENT; 4 = VERY GOOD; 3 = GOOD



¹ Sample sizes for each survey year are as follows:

2009: 49 completed surveys
 2010: 54 completed surveys
 2011: 46 completed surveys
 2012: 46 completed surveys for questions 2a, 2b, 2h, 2i, and 2j; 18 completed surveys for questions 2c through 2g
 2013: 30 completed surveys for questions 2a, 2b, 2h, 2i, and 2j; 15 completed surveys for questions 2c through 2g
 2014: 43 completed surveys for questions 2a, 2b, 2h, 2i, and 2j; 18 completed surveys for questions 2c through 2g
 2015: 30 completed surveys for questions 2a, 2b, 2h, 2i, and 2j; 12 completed surveys for questions 2c through 2g
 2016: 25 completed surveys for questions 2a, 2b, 2h, 2i, and 2j; 12 completed surveys for questions 2c through 2g
 2017: 30 completed surveys for questions 2a, 2b, 2h, 2i, and 2j; 18 completed surveys for questions 2c through 2g

2018: 27 completed surveys
 2019: 23 completed surveys

² NA = Not Applicable, since questions and responses are not comparable to the 2019 questions.

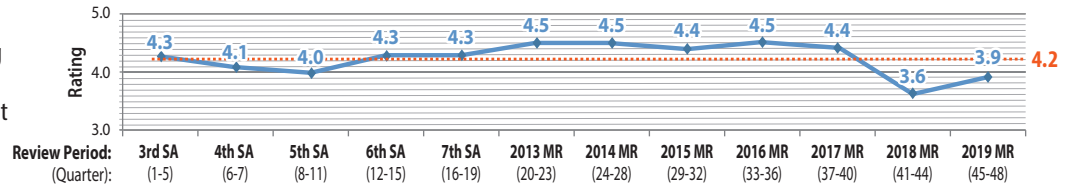
Figure 2
2019 Review of Environmental Document Document Public Meeting Materials¹

All questions combined: Cumulative average percentage (3rd SA-2019) – 4.6
Cumulative average percentage (2019) – 4.7

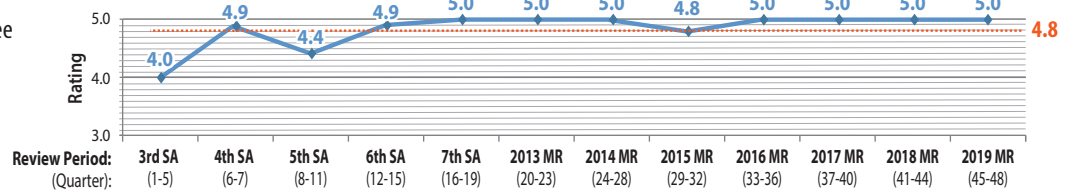
Legend

- Average by year
- Cumulative average (3rd Self-Assessment–2019)

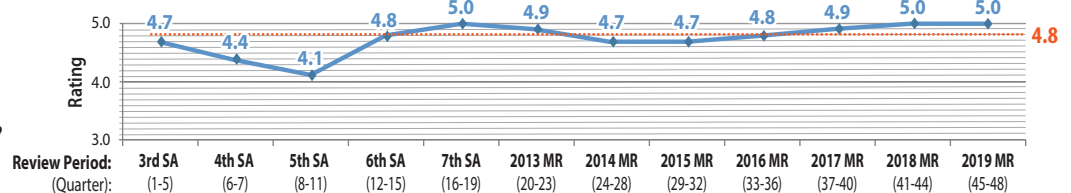
To what extent did the public meeting notice or notice of opportunity for the project environmental document meet SER requirements?



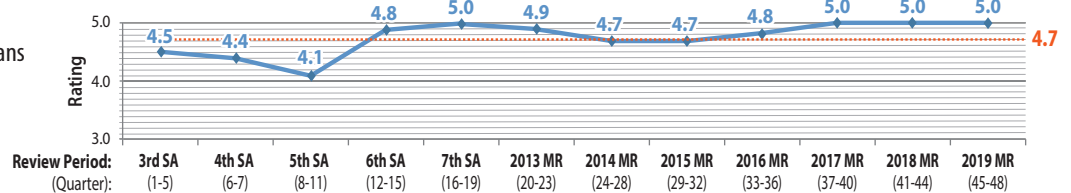
To what extent do you agree or disagree that the public meeting provided adequate opportunity for the public to register written and oral comments?



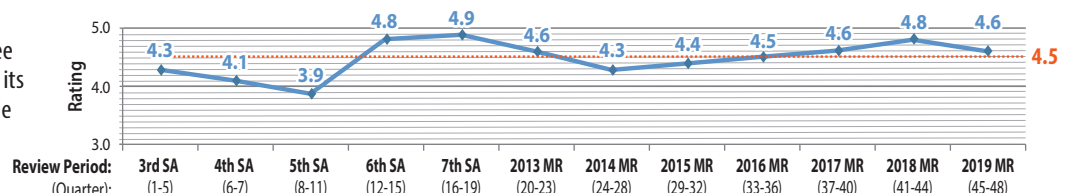
To what extent were appropriate Caltrans specialty staff available to discuss the project, its purpose and need, and alternatives with the public?



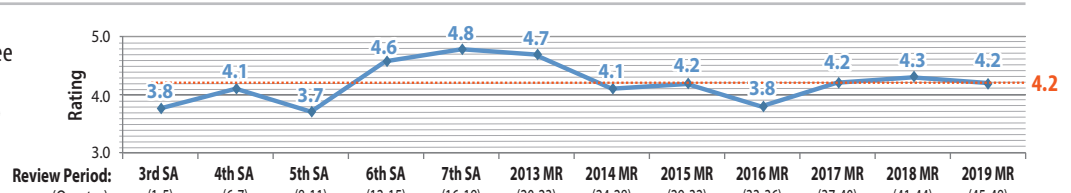
To what extent were appropriate Caltrans specialty staff available to discuss the project impacts with the public?



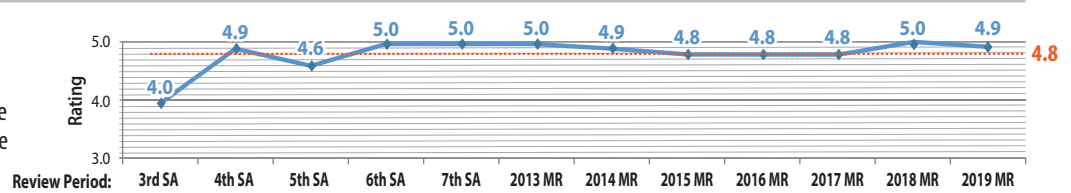
To what extent do you agree or disagree that displays depicting the project and its alternatives were easily understandable to the lay public?



To what extent do you agree or disagree that displays depicting the project impacts were easily understandable to the lay public?



Based on review of the public meeting material and input from the project generalist, to what extent do you agree that the project meeting was accessible to the public?



¹ Sample sizes: 3rd Self-Assessment - 27 projects; 4th Self-Assessment - 8 projects; 5th Self-Assessment - 22 projects; 6th Self-Assessment - 19 projects; 7th Self-Assessment - 16 projects; 2013 Monitoring Review - 17 projects; 2014 Monitoring Review - 15 projects; 2015 Monitoring Review - 15 projects; 2016 Monitoring Review - 17 projects; 2017 Monitoring Review - 23 projects; 2018 Monitoring Review - 23 projects; 2019 Monitoring Review - 17 projects.

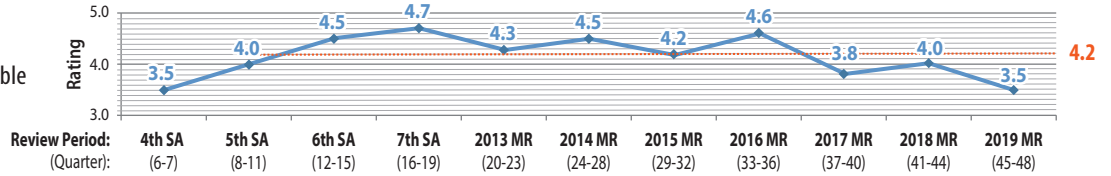
Figure 3¹
2019 Anonymous Review of Environmental Document Public Meeting Performance¹

Legend

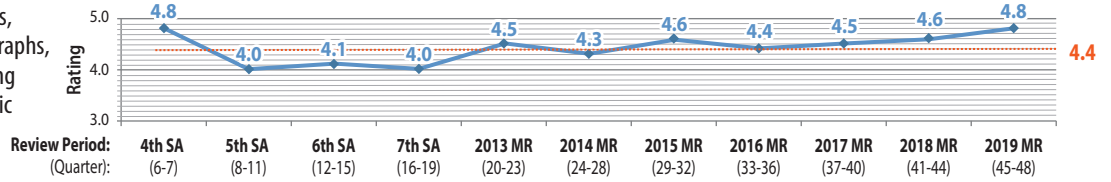
- Average by year
- 2019 Monitoring Review cumulative average

Cumulative average rating for all questions for 4th Self Assessment - 2019 Monitoring Review: 4.5
Cumulative average rating for all questions for 2019 Monitoring Review: 4.3

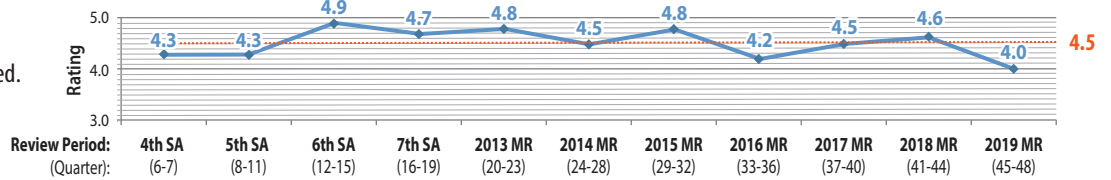
The handouts provided clear information and were understandable to the public.



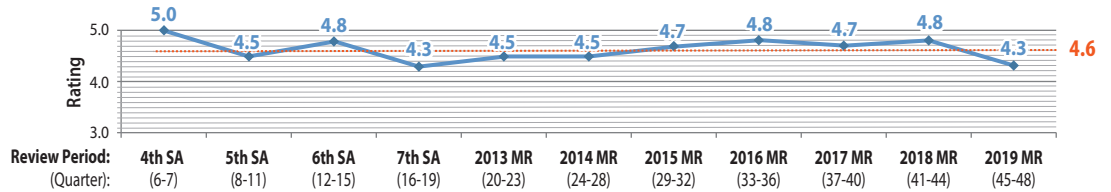
The visual aids (e.g., posters, figures, Power Point presentations, photographs, and maps) were beneficial in helping me and other members of the public understand the project and its environmental impacts.



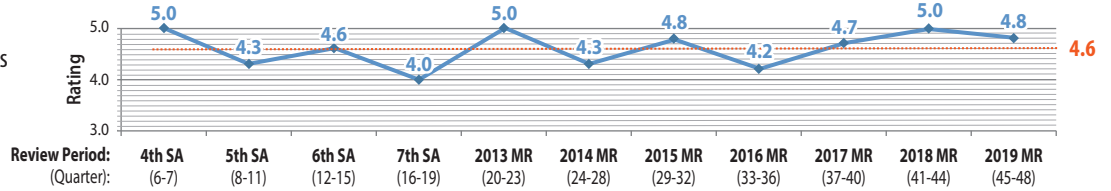
Overall, information I needed to understand the project was provided.



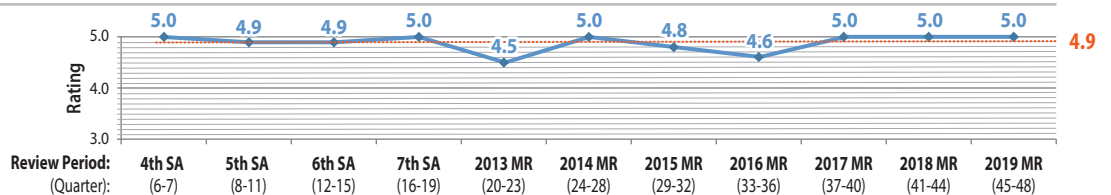
Project staff conveyed their knowledge effectively.



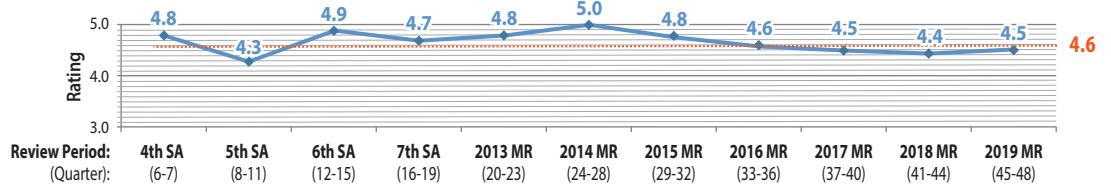
Project staff responded to questions effectively.



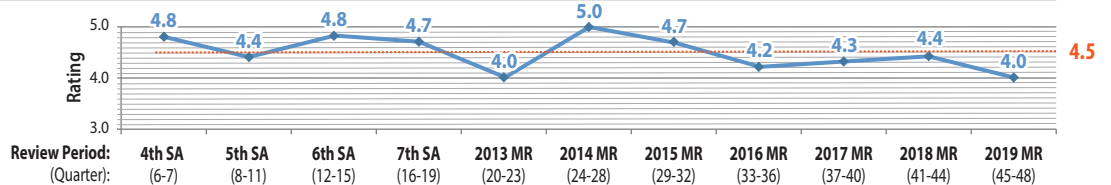
Project staff treated participants with courtesy and respect.



Overall, the meeting was valuable.



Overall, the meeting provided a positive experience.



¹ Sample sizes: 4th Self-Assessment - 4 projects; 5th Self-Assessment - 8 projects; 6th Self-Assessment - 8 projects; 7th Self-Assessment - 3 projects; 2013 Monitoring Review - 4 projects; 2014 Monitoring Review - 4 projects; 2015 Monitoring Review - 9 projects; 2016 Monitoring Review - 5 projects; 2017 Monitoring Review - 6 projects; 2018 Monitoring Review - 5 projects; 2019 Monitoring Review - 4 projects.