

KENTUCKY TRANSPORTATION CABINET STRIVES FOR IMPROVED QUALITY AND ACCOUNTABILITY

The Kentucky Transportation Cabinet (KYTC) and Federal Highway Administration – Kentucky Division (FHWA) have designed and implemented Guidance and Accountability Forms (GAF) to be used during the development of base studies prepared for projects being evaluated under either an Environmental Assessment (EA) or Environmental Impact Statement (EIS). The forms are a result of a coordinated effort between the agencies to improve the quality and consistency of the environmental reports. Contributors to the development of the GAF were staff members from KYTC – Office of Quality, KYTC – Division of Environmental Analysis (DEA), and the agency's Chief Environmental Program Administrator, as well as members of the FHWA technical staff.

GAF have been developed for nine study areas: Air Quality, Cultural/Historic, Archaeology, Aquatic Studies, Terrestrial Studies, Biological Assessment, Noise, Socioeconomic, and UST/Hazardous Materials. The purpose of the forms is to clearly document the expectations of the KYTC and FHWA with regard to the content of these reports. The forms are designed for signature and submittal by the prime consultant for the project as a means of emphasizing the responsibility of the prime in the management of the environmental aspects of the project. Furthermore, the return of the forms to the consultant at stages of document review and upon acceptance provides a means of feedback from the KYTC. The forms also provide a less subjective means of evaluating consultant performance than had previously existed. This tool will be used in the future to feed into the contract procurement process to assure that poor performance is not being rewarded with additional contracts.

The forms consist of a checklist of items that must be addressed in the subject report. The forms also require the identification of any commitments for future activities or investigation, any mitigation that may be required, and any other special issues that should be brought to the attention of the Project Team as the project is advanced. During report review, KYTC staff indicate their agreement or disagreement as to whether the report has adequately addressed each line item of the form. The form is returned to the prime consultant along with a letter identifying, with specificity, any deficiencies that have been identified.

Once a report is accepted by KYTC-DEA reviewers, the GAF and report are sent to the District Environmental Coordinator and the District Project Manager for their signatures. This is meant to assure that the Project Team is aware of any significant issues identified by the study and summarized in the GAF. Upon acceptance by the Project Manager, the form is returned to the prime consultant with instructions that with the acceptance of the report, its contents should be incorporated into the EA or EIS. Upon acceptance of an EA or EIS by the KYTC, the forms are transmitted with the document to the FHWA to demonstrate that the base studies that are the backbone of the document, have been prepared and reviewed for proper content and that all relevant issues have been considered. These latter measures have all been taken to assure

better communication of project issues and commitments and to facilitate improved follow-through on such issues.

A second form has also been developed to be used in conjunction with the GAF. A Supplier Corrective Action Request (SCAR) is generated when reports are determined to be non-compliant with the requirements outlined in the GAF. The SCAR is sent to the prime consultant and requests their explanation of why the inadequate or incomplete report was delivered for approval by KYTC. The SCAR also requires identification of specific measures that, once taken, will prevent a similar problem from reoccurring in future documents.

GAF are currently being developed for both EA, FONSI, and EIS documents. Early indications are that the documentation of FHWA and KYTC expectations has resulted in more thorough and complete reports. This reduces the time required for review and document revisions and better streamlines the environmental process. Copies of the GAF are available on the KYTC – Division of Environmental Analysis web site at www.kytc.state.ky.us/EnvAnalysis. If you would like more information on the GAF development or usage, contact Marc Clark, KYTC Office of Quality at (502) 564-4319, David Waldner, KYTC Division of Environmental Analysis at (502) 564-7250 or Anthony Goodman, FHWA-Kentucky Division at (502) 223-6742.