

PRO 400-a: Preparing an EA

Use these procedures for projects with FHWA as federal lead agency.¹

See also: [EM Chapters 400-460](#)

Effective May 2022

Start procedure: Transportation project identified as needing an EA is assigned to Region/Modal Project Lead.

Assumptions: Project/regulatory changes since ERS was signed have been reconciled, Federal Lead Agency determined, project classification confirmed with Federal Lead Agency.

End procedure: Finding of No Significant Impact (FONSI) issued for project.

Actor	Action
Region/Modal Project Office or Region Environmental Coordinator (REC)	1. Assigned project and reviews ERS database, project description, limits, schedule, and budget.
Region/Modal Project Office or REC	2. Sends memo notifying HQ Environmental Services Office (ESO) Director (with cc to HQ ESO NEPA Specialist) that the Region is beginning work on an EA. Email is an acceptable method of notification. <ul style="list-style-type: none">• Major Action: Places a copy of the notification memo in the Project File.² See EM Chapter 400.10(2).
Region/Modal Project Office or REC	3. Develops EA Project Initiation letter <ul style="list-style-type: none">• An EA Coordination Plan must be established no later than 90 days after the project initiation.• Contacts HQ ESO NEPA Specialist for model scopes of work and discipline methodology memos to assist with EA development (optional).
Region/Modal Project Office or REC	4. Schedules and conducts Project Initiation Meeting <ul style="list-style-type: none">• See TSK 400 ab1: Project Initiation Meeting.• Determines Legislative intent, FHWA (or Co-Lead), permits, Section 4(f) and 6(f) impacts, and potential Discipline Reports needed.

¹ If FTA or FRA are your federal lead agency, the procedures will be different. Consult [FTA guidance](#) or [FRA guidance](#) for projects with these federal leads.

² Assume that throughout the EA process, all memos, notifications, documents, and correspondence noted in this procedural document should be saved in the project file.

Actor	Action
	<ul style="list-style-type: none"> • Coordinates with region/modal communications office to ensure adequate Section 508 compliance for all public documents.³ • Reviews draft EA Coordination Plan. • Reviews draft Project Initiation letter.
Region/Modal Project Office	5. Sends Project Initiation letter to FHWA. <ul style="list-style-type: none"> • Major Action: Saves documents in Project File.
Region/Modal Project Office or REC	6. Meets with local and resource agency staff and the public to discuss the project. (Optional depending on project complexity.) <ul style="list-style-type: none"> • Formal scoping meetings are optional for an EA but recommended for complex and controversial projects. If formal scoping occurs, you may also choose to publish a Scoping Notice in the Federal Register or local newspaper See EM Chapter 300 for additional scoping guidance. • Major Action: Documents results of meetings (if held) in the project file.
Region/Modal Project Office or REC	7. Creates commitment file for the project. <ul style="list-style-type: none"> • Identifies and records environmental commitments made during the life of the project (in meetings, reports, EA, etc.). • Describes methods to ensure commitments are actualized. • Includes commitments in the file.
Region/Modal Project Office or REC	8. Drafts outline for the EA and sends it to the HQ ESO NEPA Specialist for review and addresses comments and revises outline as needed.
HQ ESO NEPA Specialist	9. Reviews and comments on the draft outline.
Region/Modal Project Office or REC	10. Submits revised outline to FHWA for review and comment. <ul style="list-style-type: none"> • Addresses comments and revises outline as needed. • Secures FHWA approval of outline.
Region/Modal Project Office or REC	11. Determines what Discipline Reports are needed. <ul style="list-style-type: none"> • Major Action: Documents the list of discipline reports and the rationale for choosing these disciplines for detailed study in the project file.
Region/Modal Project Office or REC	12. Conducts analyses.

³ Public-facing project documentation discussed throughout this guidance must meet [WSDOT Web accessibility guidelines](#).

Actor	Action
	<ul style="list-style-type: none"> • Writes Discipline Reports if needed. See the NEPA & SEPA webpage for guidance on discipline reports. • Topics that are not complex, significant, and/or controversial are addressed in the environmental document and do not require completion of discipline reports. Supporting documentation may be included in the appendix of the environmental document. • Collects all the Discipline Reports, and pertinent analyses from subject matter experts. • Reviews findings with FHWA and confirms that an EA is the appropriate level of environmental documentation. This may be done by email or with a formal meeting. • Major Action: Includes copies of all discipline reports and confirmation of level of environmental documentation in project file.
<p>Region/Modal Project Office or REC</p> <p>HQ ESO NEPA Specialist</p>	<p>13. Working version of EA.</p> <p>a. Prepares the working version of the EA, which typically includes:</p> <ul style="list-style-type: none"> ○ Area map, vicinity map, site plan, photogrammetric maps (to depict the environmental setting). ○ Project Purpose & Need statement and logical termini. ○ Description of the existing environment, results of the environmental analysis, project benefits, measures taken to avoid and minimize impacts, and proposed mitigation measures. ○ All required agency coordination letters, such as endangered species listings, prime and unique farmland determinations, Section 106/tribal consultation, archaeological/historic reports, and summary of public involvement. ○ Summary of Section 4(f) issues or required USDOT approval, including draft Section 4(f) evaluation. ○ Authors should review the Comment Form Analysis Report to assure that common document issues are addressed during writing. <p>b. Provides guidance and input on working version of EA on request.</p>
<p>Region/Modal Project Office or REC</p>	<p>14. Submits the working version of the EA and discipline reports to appropriate technical specialist and HQ ESO NEPA Specialist for QA/QC review. A phased review of individual chapters and sections is often beneficial in expediting the process.</p>

Actor	Action
WSDOT Technical Specialists and HQ ESO NEPA Specialist	<p>15. Reviews for accuracy and consistency within document and sends comments to Project Office.</p> <ul style="list-style-type: none"> • Reviews the Comment Form Analysis Report to assure that common document issues are addressed during writing. This can expedite document review. • Use WSDOT Comment Form. • Returns reviews and comments to Region/Modal Project Office or REC.
Region/Modal Project Office, REC, or Consultant	<p>16. Addresses HQ ESO NEPA Specialist and subject matter expert's comments and revises document as needed.</p> <ul style="list-style-type: none"> • If a consultant has been hired to write the EA, the Project Office reviews the comments first and provides guidance for responses. • Major Action: Saves copies of comments and responses in the project file.
Region/Modal Project Office	<p>17. Submits preliminary EA (and individual 4(f) evaluation, if applicable) to FHWA for review and comment.</p> <ul style="list-style-type: none"> • Coordinate with FHWA to determine whether concurrent reviews may occur with coordinating and participating agencies. If so, send to other agencies for concurrent review. • Allow two weeks for FHWA Division Office review.
FHWA	<p>18. Reviews preliminary EA and returns document with comments to Project Office.</p> <ul style="list-style-type: none"> • May include legal review. • Use WSDOT Comment form.
Region/Modal Project Office, REC, or Consultant	<p>19. Addresses all FHWA's comments</p> <ul style="list-style-type: none"> • Informs the HQ ESO NEPA Specialist of comments received, and changes made to the document. • If no concurrent review was allowed in Step 17 above, send preliminary EA to cooperating and participating agencies. • Major Action: Documents changes in project file.
Region/Modal Project Office, REC	<p>20. <i>If there is an individual 4(f) evaluation, Submits</i> the 4(f) evaluation to FHWA for legal review.</p> <ul style="list-style-type: none"> • The review typically requires 30 days. More time may be required for very complex projects. • This may also include an optional legal review of the EA. • Receives comments from legal staff. • Sends comments to Project Office.

Actor	Action
Region/Modal Project Office or REC	<p>21. Addresses comments from legal review and revises EA as needed.</p> <ul style="list-style-type: none"> • FHWA reviews documents and agrees that their comments have been adequately addressed. • Reviews may include additional review by legal staff. Repeat this step as needed. • The legal sufficiency review could determine that an EIS is required for the project. If so, see the NEPA & SEPA webpage for more information. • Major Action: Documents changes in project file.
Region/Modal Project Office or REC	<p>22. Schedules signature briefing with HQ ESO Director through HQ ESO NEPA Specialist.</p> <ul style="list-style-type: none"> • See PRO 400-ab4: Conducting ESO Signature Briefing. • Major Action: ESO Director signs EA cover page at Signature Briefing.
Region/Modal Project Office or REC	<p>23. Sends the signed EA to FHWA for signature.</p>
FHWA	<p>24. Signs the EA and returns it to the Project Office.</p> <ul style="list-style-type: none"> • FHWA signature date is the issuance date for the EA. • Major Action: Includes copy of signed EA in project file.
Region/Modal Project Office or REC	<p>25. Prints and distributes copies of the EA and, if applicable, Draft Section 4(f) and 6(f) Evaluations.</p>
Region/Modal Project Office or REC	<p>26. Publishes Notice of Availability (NOA) of the EA and, if applicable, Draft Section 4(f) and 6(f) Evaluations for public review and comment.</p> <ul style="list-style-type: none"> • See REF 400-ab5: Notice of Availability. • Major Action: Documents NOA publish date in project file.
Region/Modal Project Office or REC	<p>27. Holds Open House or Environmental Hearing⁴ (if requested) – Environmental hearings are not required for EAs but may be requested by an agency or organization. A hearing must be held if requested so scheduling a hearing eliminates the risk of a project delay.</p> <ul style="list-style-type: none"> • An open house or environmental hearing for the EA may be combined with another project hearing such as a design or access hearing as appropriate.

⁴ The WSDOT Design Manual uses the term “Environmental Hearing,” to differentiate the event from the many different types of public hearings conducted by our agency. The purpose, format, and goals of an Environmental Hearing complies with all of the requirements of [23 CFR 771.119\(e\)](#) for a public hearing.

Actor	Action
	<ul style="list-style-type: none"> • See TSK 400-ab9: Environmental Hearing and WSDOT <i>Design Manual Chapter 210</i> for hearing format and procedure. • The Environmental Hearing cannot occur until 15 days after the NOA is published. • Major Action: If a hearing is held, includes a record of the hearing and comments received in the project file.
Region/Modal Project Office or REC	<p>28. Revises the EA to reflect changes in the proposed action, impacts, or mitigation measures resulting from agency review public comments (and the environmental hearing, if applicable).</p> <ul style="list-style-type: none"> • Describes coordination efforts and summarizes key issues received from the public and agencies and how they were addressed. • Concludes the Section 4(f) process and prepares final evaluation for distribution with the revised EA or FONSI. Section 6(f) will conclude after the FONSI is issued. • If changes are significant, requiring a revised EA, the HQ ESO Director and FHWA will need to sign the title page of the revised EA. • If changes are minor and do not require the issuance of a Revised EA, the region and FHWA may choose to issue an “erratum” as part of the FONSI, referencing minor changes in the EA. • FHWA may decide that the environmental impacts are significant and warrant completion of an EIS. If so see PRO 400-b: Preparing an EIS. • Major Action: Documents changes in project file.³
Region/Modal Project Office or REC	<p>29. Prepares draft FONSI</p> <ul style="list-style-type: none"> • See REF 400-a1: Typical Content of a FONSI.
Region/Modal Project Office or REC	<p>30. Sends the draft FONSI to FHWA for review and completion.</p> <ul style="list-style-type: none"> • FTA/FRA may choose to complete the FONSI and review it with WSDOT before signature. • FHWA usually requests WSDOT to revise the FONSI as directed and return it for signature.
FHWA	<p>31. Prepares and issues the FONSI by signing document and returns a signed copy to the Project Office.</p> <ul style="list-style-type: none"> • Major Action: Saves documents in project file.
Region/Modal Project Office or REC	<p>32. Distributes the FONSI</p> <ul style="list-style-type: none"> • Prints final copies of the Revised EA and the Final Section 4(f) and 6(f) Evaluations as appropriate, and FONSI.

Actor	Action
	<ul style="list-style-type: none"> • Sends a copy to HQ ESO. • Sends a copy to HQ Access and Hearings Office if an Access Revision Report (ARR) was conducted either prior to, or as part of the analysis. • WSDOT practice is to circulate the FONSI and the Final Section 4(f) Evaluation in the same manner as the EA. • Major Action: Documents who received copies of the documents and notices in the project file.
Region/Modal Project Office or REC	<p>33. Publishes the NOA of the FONSI and the final Section 4(f) Evaluation in the same newspapers previously used on the project.</p> <ul style="list-style-type: none"> • Issue a Notice of Action Taken (NAT) for SEPA Determination of Nonsignificance (DNS) projects and Statute of Limitations (SOL) Notice for NEPA projects. See PRO 400-ab6: Legal Considerations. • Major Action: Records NOA, NAT, and SOL dates in project file.
Region/Modal Project Office or REC	<p>34. Documents the decision by including the FONSI, the EA, and supporting documentation in the project file and the administrative record. See the NEPA & SEPA webpage for procedures and guidance on maintaining an Administrative Record.</p>