

Quality Control and Assurance for Biological Technical Documents

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Prepared by

Division of Environmental Analysis, Office of Biological Studies

The Caltrans biological technical documents, and those authorized under the Federal Aid Local Assistance Program, provide natural resource information and analysis for project delivery team (PDT) decisions, environmental document preparation and public input as well as permits, licenses, agreements or certifications (PLAC). Careful, consistent, and concise quality control (QC) and assurance (QA) procedures allow Caltrans to effectively provide information and respond to public or agency inquiries regarding compliance with policies and regulations, as well as federal environmental responsibilities and consultations pursuant to NEPA Assignment (See SER Vol. 1, Ch. 38). The District Environmental Deputy is responsible to ensure that each biological technical document is prepared by a qualified expert, uses standard formats and content, meets applicable policies and regulations, and the QA/QC process is concisely documented.

Document Preparation and Quality Control (QC) Requirements:

The District Biologist will prepare biological technical documents.

The District Biologist classifications:

- Associate Environmental Planner, Natural Science (AEPNS)
- Senior Environmental Scientist (Specialist) (SESS)
- Senior Environmental Planner with previous AEPNS, SESS or equivalent experience
- Environmental Planners, Natural Science (EPNS)*
- Environmental Scientist (ES)*

*Demonstrating sufficient knowledge, skills and experience for specific projects may prepare these documents at management's discretion.

Consultant Biologist(s) may be approved to prepare documents (under the guidance of the District Biologist) where they have comparable knowledge, skills and experience to that of an AEPNS or SESS in state service with a minimum of three years professional biological environmental assessment experience (e.g., conducting field surveys, preparing biological reports for environmental documents, assisting in endangered species consultations, delineating wetlands, etc.).

All Biological Technical Documents are to be prepared consistently using the standard annotated templates found in the [Standard Environmental Reference \(SER\)](#). Approvals for District/Region specific variants of any standard format found on the SER are to be requested from the Division of Environmental Analysis - Biological Studies Office prior to use. Where a

standard template is not available, a consistent District or Region format should be used. Additionally, terminology used in Biological Assessments must be consistent with language in the Federal Endangered Species Act (as amended) and language in guidance provided by the U.S. Fish & Wildlife Service and National Marine Fisheries Service.

All information provided during informal Endangered Species Act and Essential Fish Habitat (EFH) consultations shall be consistent with the content, analysis and terminology of the BA and EFH templates respectively.

District Biologists and/or their managers conduct federal endangered species and essential fish habitat consultations (both verbal and written). However, project partners are encouraged to participate and consultants may provide information.

The District Biologist preparing BA, NES, NES (MI), Essential Fish Habitat Assessments (EFH), Habitat Mitigation and Monitoring Plans (HMMP) or other stand-alone biological technical documents will consistently and methodically check and adjust documents during preparation to minimize errors and ensure that information is effectively prepared in accordance with requirements.

A final draft shall meet the following criteria:

- The biological technical document type, content, and level of detail must be appropriate for the project and scope of effects using the appropriate standard template (as available)
- All necessary biological issues must be addressed with clear logical analysis that is professionally appropriate, accurate, complete, consistent and supported by data
- Supporting documents such as field notes, mapping, correspondence, administrative records, communication log and records of conversation must be properly organized and included in the file
- The document must be readable with good writing practices including controlled use of jargon, acronyms, grammar, syntax, abbreviations, etc. and be consistent in format and style
- The biological technical document provides the requisite natural resource information and analysis for PDT decisions, resource agency review, PLAC, and/or public input during Environmental Document circulation
- Description of the project and avoidance, minimization, and compensation commitments, are acceptable and have been approved as necessary by the PDT
- Coordination and input from other functional units or specialists has been sought as needed
- Any issues are resolved, and subsequent peer review comments addressed as needed.

All biological technical documents will include the name of the biologist(s) preparing the documents and the manager overseeing the work. These people should be prepared to answer

questions regarding document content, quality and preparation. At management's discretion, Districts may use district specific checklists, worksheets or other tools to assist preparation and/or when verifying the documents were prepared by qualified experts, meet regulatory and professional standards, and reflect the actions and commitments of the lead agency.

Independent Peer Review and Correspondence

Caltrans must independently review the quality and content of all Biological Technical Documents supporting NEPA decisions or consultation responsibilities assumed pursuant to NEPA Assignment (See SER Vol. 1, Ch. 38). Biological technical documents submitted to Caltrans must include quality control documentation consistent with this guidance. The documentation must be adequate to follow the administrative record and include a log of contacts with names and contact information.

A District Biologist employed by Caltrans who is not the author will independently peer-review documents, related files, supporting documentation and quality control documentation to verify they meet all applicable requirements and the analysis used to make effect findings is sound. Any deficiencies, corrective measures or related correspondence must be documented and retained in the file.

Upon resolution of any issues and completion of the peer review process, a District Biologist (typically the author or consultant oversight) employed by Caltrans will sign the document as a recommendation for approval. A brief NES (MI) of 1-2 pages that documents no effects and is prepared by a District Biologist employed by Caltrans does not require peer review but does require a recommendation signature as noted above.

A District Environmental Branch Chief will carefully review the descriptions of the intended actions, effect findings, and commitments as well as, applicable standards and policies then as appropriate will sign the document as an approval for use in NEPA determinations and federal consultation. This will also serve as an acknowledgement of any Caltrans obligations contained within the document for these purposes.

A District Environmental Branch Chief will sign all correspondence that transmits official submittals or initiates/concludes formal consultation between agencies. Federal consultations assumed under NEPA Assignment, both verbal and written, may only be conducted by Caltrans. This cannot be delegated to other agencies or consultants. Acceptance of analysis, findings and commitments is documented through transmittal and response letters used during consultation. If prepared on behalf of an entity other than Caltrans, the local agency's representative should be given an opportunity to review the documents or correspondence prior to submittal.