Section 404 Permit Local Coordination Procedures

Update to 2002 Local Coordination Procedures (LCP)

Gail A. D’Avino, PhD
Asst. State Env. Admin.

Dave Hedeen
Ecology Section Manager

October 2019
Today’s Agenda

• Overview
  ✓ Purpose
  ✓ Updates from 2002
  ✓ Framework & participants

• Process
  ✓ Checkpoint details
  ✓ Post-PAR project delivery

• Schedule and Contract Considerations
  ✓ Baseline activities
  ✓ Contract scope

• Wrap-up
Purpose of Local Coordination Procedures (LCP)

Comply with US Army Corps of Engineers 404(b)(1) guidelines which require the identification of the Least Environmentally Damaging Practicable Alternative (LEDPA)
Establish a Practicable Alternatives Review (PAR) process

✓ Interagency coordination procedures for certain Department projects
✓ Required for RGP35 (Special Condition 4) and Individual Permits
Requires a permit before dredged or fill material may be discharged into waters of the US
Section 404 Permit Types

- Individual Permits
- General Permits
  - Nationwide Permits
  - Regional Permits
# 2018 Regional Permit Thresholds

<table>
<thead>
<tr>
<th>Permit type†</th>
<th>Document and/or Project type</th>
<th>Area* each crossing</th>
<th>Area* per HUC</th>
<th>Linear feet** each crossing</th>
<th>Linear feet** per HUC</th>
</tr>
</thead>
<tbody>
<tr>
<td>RGP30† (cf. NW 3)</td>
<td>Maintenance, Repair, Rehabilitation, and Replacement</td>
<td>No threshold</td>
<td>No threshold</td>
<td>Stream modifications only within 100 ft of existing x-ing.</td>
<td>No threshold</td>
</tr>
<tr>
<td>RGP31† (cf. NW 25, NW 33)</td>
<td>Temporary Impacts</td>
<td>No threshold</td>
<td>No threshold</td>
<td>Stream modifications only within 100 ft of existing x-ing.</td>
<td>No threshold</td>
</tr>
<tr>
<td>RGP32 (cf. NW 14, NW 23, RP 1)</td>
<td>Replacement of a Bridge with a Bridge</td>
<td>No threshold</td>
<td>No threshold</td>
<td>Stream modifications only within 100 ft of existing x-ing.</td>
<td>No threshold</td>
</tr>
<tr>
<td>RGP33 (cf. NW 14, NW 23, RP 1)</td>
<td>Replacement of a Culvert with a Culvert or a Bridge</td>
<td>No threshold</td>
<td>No threshold</td>
<td>Stream modifications only within 100 ft of existing x-ing.</td>
<td>No threshold</td>
</tr>
<tr>
<td>RGP34 (cf. RP 96)</td>
<td>Construction on Existing or New Alignment</td>
<td>≤ 2 ac North ≤ 3 ac South</td>
<td>≤ 8 ac North ≤ 10 ac South</td>
<td>≤ 1,500 lf North ≤ 1,000 lf South</td>
<td>≤ 2,000 lf North ≤ 1,500 lf South</td>
</tr>
<tr>
<td>RGP35 (cf. IP)</td>
<td>Construction on New Alignment</td>
<td>≤ 4 ac North ≤ 5 ac South</td>
<td>≤ 12 ac North ≤ 15 ac South</td>
<td>≤ 2,000 lf North ≤ 1,500 lf South</td>
<td>≤ 5,000 lf North ≤ 4,000 lf South</td>
</tr>
</tbody>
</table>

Note: Thresholds for RP 34 and RP 35 are only for permanent losses, not temporary impacts.

† PCN not required as long as impacts are below 100 linear feet and 0.1 acre AND no effect on resources under Section 7 (ESA) and Section 106 (NHPA).

* Area of jurisdictional wetlands, open waters, and perennial, intermittent, and ephemeral streams.

** Linear feet of jurisdictional perennial, intermittent and ephemeral streams.
Practicable?

- Capable of being done (Merriam Webster)
- Available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purposes (40 CFR 230.10(a)(2))
Why Update?

- 2002 process occurred too late to be truly effective
  ✓ Didn’t specify when during project development PAR should occur
- No clear role for non-ecology project delivery team members
2002 Process Issues Addressed

- Allows meaningful agency coordination during concept phase before major decisions are made
- Begins prior to preliminary design to allow for meaningful avoidance and minimization consideration
- Adaptable to project type and project specific details
- Clearly defines completion
Main Differences – 2002 v 2019

2002 trigger – permit type
✓ Individual Permits

2019 trigger – project type
✓ Major widening
✓ New location
State and federally funded projects
Primarily new projects but adaptable for legacy projects
Compatible with Environmental Impact Statement scoping process
Compatible with design-build delivery
• Occurs during concept phase
• Initiated for major widening and new location projects
  ✓ Opt out if apparent that RGP35 or IP thresholds not exceeded
• Reach consensus on project specific approach
• Combine steps, if appropriate
The Project Team Initiation Process (PTIP) allows identification of non-widening and non-new location projects likely to require a PAR.

Checkpoints begin once schedule is established and staff are assigned.

Process ends before Concept approval and A3M.
Process Flow

- PDP milestone
- Project delivery activity
- Project personnel
- Interagency checkpoint
- Information provided by the Department
- Agency feedback/checkpoint outcome
- Documentation of checkpoint outcome
## Concept Phase and PAR

### Limited to Major New Location & Major Widening Projects

<table>
<thead>
<tr>
<th>PDP Milestone</th>
<th>PE Authorization</th>
<th>Develop Initial Range of Alternatives (Including Anticipated Minor New Location Sections for Existing Widening)</th>
<th>Narrow Range of Alternatives</th>
<th>Propose Environmental Survey Boundary(ies) for Narrowed Range of Alternatives</th>
<th>Environmental Resource Identification</th>
</tr>
</thead>
<tbody>
<tr>
<td>PTIP</td>
<td>Baseline Schedule Approval</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 1st Checkpoint Early Coordination/ Purpose & Need

- Introduction to project
- Staff assignment
- Preliminary Need & Purpose*
- Logical Termini &/or Independent Utility*
- Class of Action (Federal-aid)
- Funding (state & federal)
- Project area
- Are there tolling &/or P3 considerations?
- For Design-Build – anticipated permit applicant (GDOT or Contractor?)

### 2nd Checkpoint Pre-application/ Alternatives

- Alternative(s) Department is considering for advancement
- Environmental Survey Boundary(ies), i.e., extent of survey area
- Level of field work for alternative(s)

* submitted to participants prior to checkpoint 1

### 3rd Checkpoint Preliminary LEDPA

- PAR report
- Anticipated impacts of alternative(s) being carried forward
- Justification of GDOT’s Preferred Alternative as preliminary Least Environmentally Damaging Practicable Alternative (LEDPA)

### Agency Participants

- **Federal**
  - NMFS (as needed)
  - USFWS (as needed)
  - Corps (if coastal)
- **State**
  - FHWA (federal-aid)
  - USACE
  - DNR
  - DNR-CD (if coastal)
  - EPD
  - GA-DA (if coastal)
- **GDOT**
  - Designer
  - Environmental Analyst
  - Ecologist
  - Historian
  - Archaeologist

### Documentation of Checkpoint Outcome

- GDOT letter to agencies recapping of discussion
- Comments on termini
- Desire to proceed to checkpoint 2
- HMWA &/or USACE
- Agreement on termini
- Decision on need to proceed to checkpoint 2

<table>
<thead>
<tr>
<th>GDOT Letter to Agencies Recapping of Discussion</th>
<th>Comments on termini</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comments on alternative(s) &amp; level of field work</td>
<td>HMWA &amp;/or USACE</td>
</tr>
<tr>
<td>Agreement on termini</td>
<td>HMWA &amp;/or USACE</td>
</tr>
<tr>
<td>Decision on need to proceed to checkpoint 2</td>
<td>HMWA &amp;/or USACE</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Corps Letter to Agencies Recapping of Discussion</th>
<th>Comments on termini</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comments on alternative(s) &amp; level of field work</td>
<td>HMWA &amp;/or USACE</td>
</tr>
<tr>
<td>Agreement on termini</td>
<td>HMWA &amp;/or USACE</td>
</tr>
<tr>
<td>Decision on need to proceed to checkpoint 3</td>
<td>HMWA &amp;/or USACE</td>
</tr>
</tbody>
</table>

### Practicable Alternatives Review (PAR) Process

- Agreement on termini
- Agreement on need to continue to checkpoint 2
- Concerns with Preliminary Need & Purpose, including Logical Termini &/or Independent Utility
- Red flags, e.g., important resources
- Agreement on need to continue to checkpoint 3
- Lack of concurrence on preliminary LEDA
- Justification of GDOT’s Preferred Alternative as preliminary Least Environmentally Damaging Practicable Alternative (LEDPA)

### Interagency Checkpoint

- Purpose
- Early Coordination
- Practicable Alternatives Review
- Support from GDOT

<table>
<thead>
<tr>
<th>Interagency Checkpoint</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Coordination</td>
<td>Practicable Alternatives Review</td>
</tr>
<tr>
<td>Practicable Alternatives Review</td>
<td>Support from GDOT</td>
</tr>
</tbody>
</table>

### Project Team Initiation Process

- Purpose
- Early Coordination
- Practicable Alternatives Review
- Support from GDOT

<table>
<thead>
<tr>
<th>Project Team Initiation Process</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Coordination</td>
<td>Practicable Alternatives Review</td>
</tr>
<tr>
<td>Practicable Alternatives Review</td>
<td>Support from GDOT</td>
</tr>
</tbody>
</table>

### Information Provided by GDOT

- Federal
  - NMFS (as needed)
  - USFWS (as needed)
  - Corps (if coastal)
- State
  - FHWA (federal-aid)
  - USACE
  - DNR
  - DNR-CD (if coastal)
  - EPD
  - GA-DA (if coastal)
- GDOT
  - Designer
  - Environmental Analyst
  - Ecologist
  - Historian
  - Archaeologist

### Agency Feedback/ Outcome of Checkpoint

- Agency Participants
  - **Federal**
    - NMFS (as needed)
    - USFWS (as needed)
    - Corps (if coastal)
  - **State**
    - FHWA (federal-aid)
    - USACE
    - DNR
    - DNR-CD (if coastal)
    - EPD
    - GA-DA (if coastal)
  - **GDOT**
    - Designer
    - Environmental Analyst
    - Ecologist
    - Historian
    - Archaeologist
- Documentation of Checkpoint Outcome
  - GDOT letter to agencies recapitulating discussion
  - Comments on termini
  - Desire to proceed to checkpoint 2
  - HMWA &/or USACE
  - Agreement on termini
  - Decision on need to proceed to checkpoint 2
  - Agreement on need to continue to checkpoint 3
  - Concerns with Preliminary Need & Purpose, including Logical Termini &/or Independent Utility
  - Red flags, e.g., important resources

### PTIP (Project Team Initiation Process)

- Purpose
- Early Coordination
- Practicable Alternatives Review
- Support from GDOT

<table>
<thead>
<tr>
<th>PTIP (Project Team Initiation Process)</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Coordination</td>
<td>Practicable Alternatives Review</td>
</tr>
<tr>
<td>Practicable Alternatives Review</td>
<td>Support from GDOT</td>
</tr>
</tbody>
</table>

### Schedule Review

- Purpose
- Early Coordination
- Practicable Alternatives Review
- Support from GDOT

<table>
<thead>
<tr>
<th>Schedule Review</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Coordination</td>
<td>Practicable Alternatives Review</td>
</tr>
<tr>
<td>Practicable Alternatives Review</td>
<td>Support from GDOT</td>
</tr>
</tbody>
</table>

### Assistance & Mitigation Measures Meeting

- Purpose
- Early Coordination
- Practicable Alternatives Review
- Support from GDOT

<table>
<thead>
<tr>
<th>Assistance &amp; Mitigation Measures Meeting</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Coordination</td>
<td>Practicable Alternatives Review</td>
</tr>
<tr>
<td>Practicable Alternatives Review</td>
<td>Support from GDOT</td>
</tr>
</tbody>
</table>

### Early Coordination

- Purpose
- Early Coordination
- Practicable Alternatives Review
- Support from GDOT

<table>
<thead>
<tr>
<th>Early Coordination</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Coordination</td>
<td>Practicable Alternatives Review</td>
</tr>
<tr>
<td>Practicable Alternatives Review</td>
<td>Support from GDOT</td>
</tr>
</tbody>
</table>

### Support from GDOT

- Purpose
- Early Coordination
- Practicable Alternatives Review
- Support from GDOT

<table>
<thead>
<tr>
<th>Support from GDOT</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Coordination</td>
<td>Practicable Alternatives Review</td>
</tr>
<tr>
<td>Practicable Alternatives Review</td>
<td>Support from GDOT</td>
</tr>
</tbody>
</table>
Multidisciplinary approach for project delivery team

Multiple agency involvement
Benefits of Interdisciplinary & Interagency Process

- Agency engagement before developing PAR report – reduce review cycles
- Early agreement on project termini
- Eliminate rework on alternative selection – all disciplines considered
  ✓ Environmental resources identified, generally
  ✓ Foundation for alternatives analysis required for different disciplines
- Identify preliminary LEDPA before the start of environmental technical studies
Project Delivery Team Participation

- Project Manager
- Ecologist
- Roadway Designer
- Environmental Analyst
- Additional Subject Matter Experts, as needed
  - Archaeologist
  - Historian
  - Bridge Designer
  - Construction
Agency Participation

- Key Agencies
- Commenting Resource Agencies
Key Agencies

- US Army Corps of Engineers
- Federal Highway Administration (federally funded projects)
- Georgia Department of Transportation
Commenting Resource Agencies

• **Federal agencies**
  ✓ US Environmental Protection Agency
  ✓ US Fish and Wildlife Service
  ✓ National Marine Fisheries Service (marine species and/or anadromous fish)
  ✓ US Coast Guard (navigable waters)

• **State agencies**
  ✓ Georgia Department of Natural Resources
    o Environmental Protection Division
    o Wildlife Resources Division
    o Historic Preservation Division
    o Coastal Resources Division (coastal marshlands, tidally influences waters)
• Focus on major widenings and new location projects
  ✓ PTIP – identify other projects

• Framework – not prescriptive, adaptable to project specifics

• Occurs during concept phase

• Interdisciplinary

• Interagency
Questions?
Three-step Process

1. Early coordination/Need and Purpose
2. Pre-application/Alternatives
3. Preliminary LEDPA
Pre-Checkpoint #1 Activities

• Project need identified by
  ✓ Director of Planning
  ✓ District Office
  ✓ Local Government

• Funding years identified (if accepted), add to
  ✓ State Transportation Improvement Program (STIP)
  ✓ Construction Work Program (CWP)
  ✓ Long Range Transportation Plan (LRTP)

• Project Team Initiation Process (PTIP)
  ✓ Begin to develop scope and budget

• Schedule Review Committee
  ✓ Establish baseline schedule
Concept Phase following PTIP & Schedule Review Committee

Project Delivery Activity
Personnel
Interagency checkpoint
Information Provided by GDOT
Agency Feedback/checkpoint outcome
Documentation of checkpoint outcome

Practicable Alternatives Review (PAR) Process
# Checkpoint #1 - Process Flow

<table>
<thead>
<tr>
<th>PDP Milestone</th>
<th>PE Authorization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Delivery Activity</td>
<td>Develop initial range of alternatives (including anticipated minor new location sections for existing widenings)</td>
</tr>
<tr>
<td>GDOT Personnel</td>
<td>Designer &amp; environmental SMEs</td>
</tr>
<tr>
<td>Interagency checkpoint</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; checkpoint Early Coordination/ Purpose &amp; Need</td>
</tr>
</tbody>
</table>
| Information provided by GDOT | • Introduction to project  
• Staff assignment  
• Schedule  
• Preliminary Need & Purpose*  
• Logical Termini &/or Independent Utility*  
• Class of Action (federal-aid)  
• Funding (state v. federal)  
• Project area  
• Are there tolling &/or P3 considerations?  
• For Design-Build – anticipated permit applicant (GDOT or Contractor?) |
| Agency feedback/ Outcome of checkpoint | • Red flags, e.g., important resources  
• Concerns with Preliminary Need & Purpose, including Logical Termini &/or Independent Utility  
• Agreement on need to continue to checkpoint 2 |
| Documentation of checkpoint outcome | GDOT letter to agencies recapping of discussion Commenting agencies  
• Comments on termini  
• Desire to proceed to checkpoint 2 FHWA &/or USACE  
• Agreement on termini  
• Decision on need to proceed to checkpoint 2 |
Checkpoint #1
Early Coordination/Need & Purpose

• Information provided
  ✓ Preliminary Need & Purpose
  ✓ Logical Termini &/or Independent Utility
  ✓ Funding source
  ✓ Lead federal agency
  ✓ Criteria for evaluating alternatives prior to field work
Checkpoint #1
Early Coordination/Need & Purpose

• **Outcomes**
  ✓ Red flags
  ✓ Concerns with N&P &/or termini
  ✓ Concurrence on evaluation criteria
  ✓ Decision on need to proceed to Checkpoint #2

• **Documentation**
  ✓ Department letter to agencies recapping discussion
### Checkpoint #2 – Process Flow

<table>
<thead>
<tr>
<th>PDP Milestone</th>
<th>Project Delivery Activity</th>
<th>Interagency checkpoint</th>
<th>Information provided by GDOT</th>
<th>Agency feedback/Outcome of checkpoint</th>
<th>Documentaion of checkpoint outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Broad range of alternatives</td>
<td>Propose environmental survey area for narrowed range of alternatives</td>
<td>Design &amp; environmental SMEs</td>
<td>Designer</td>
<td>Environmental Resource Identification**</td>
<td>GDOT letter to agencies recapping results of discussion</td>
</tr>
<tr>
<td>Designer &amp; environmental SMEs</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Commenting agencies</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; checkpoint Pre-application/ Alternatives</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Alternative(s) Department is considering for advancement</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Agreement on PAR survey area</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Level of field work for alternative(s)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Agree or disagree on of alternative(s)being carried forward</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Agreement on PAR survey area</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Agreement on level of field work for alternative(s) (including consideration of sections with later schedules)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Agreement on need to continue to checkpoint 3 &amp; if field visit required</td>
</tr>
</tbody>
</table>

**May occur before or after checkpoint 3

<table>
<thead>
<tr>
<th>Ecologist, Historian, Archaeologist Environmental Analyst</th>
</tr>
</thead>
<tbody>
<tr>
<td>GDOT letter to agencies recapping results of discussion</td>
</tr>
</tbody>
</table>
Checkpoint #2
Pre-Application/Alternatives

• **Information provided**
  ✓ Alternatives being considered for advancement
  ✓ Proposed survey boundary for the PAR
  ✓ Level of field work (if any) for alternatives being advanced

• **Outcomes**
  ✓ Agreement on alternatives, survey boundary & field work
  ✓ Consideration of sections with later schedules
  ✓ Decision on need to proceed to Checkpoint #3 and need for on-site meeting
• **Design**
  - Gather preliminary data
  - Determine preliminary design criteria
  - Receive traffic and crash data

• **Environmental**
  - Results of early coordination & background research (check report prepared for PTIP)
  - Known stakeholder interest
  - Recommendation for level of field work
Checkpoint #2 – Timeline

• **Prior to interagency meeting**
  ✓ 15 business days – Department submits materials to agencies
    o Map depicting alignment(s)
    o Drawing of alignment(s)
    o Known resources
  ✓ Agencies can submit questions and/or comments in advance or bring to meeting

• **Following interagency meeting**
  ✓ 20 business days – Agencies provide written comments to Department
  ✓ Department prepares & circulates letter with findings
Option to Combine Checkpoints #1 and #2

- More likely for existing widening projects
- Generally a narrower range of alternatives being advanced
## Checkpoint #3 – Process Flow

<table>
<thead>
<tr>
<th>PDP Milestone</th>
<th>Concept Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Delivery Activity</td>
<td>A3M</td>
</tr>
<tr>
<td>GDOT Personnel</td>
<td>Designer &amp; environmental SMEs</td>
</tr>
<tr>
<td>Interagency checkpoint</td>
<td></td>
</tr>
<tr>
<td>Information provided by GDOT</td>
<td></td>
</tr>
<tr>
<td>Agency feedback/Outcome of checkpoint</td>
<td></td>
</tr>
<tr>
<td>Documentation of checkpoint outcome</td>
<td></td>
</tr>
</tbody>
</table>

### Environmental Resource Identification**

**May occur before or after checkpoint 3

- Ecologist, Historian, Archaeologist, Environmental Analyst

<table>
<thead>
<tr>
<th>3rd checkpoint Preliminary LEDPA</th>
</tr>
</thead>
</table>

- PAR report
- Anticipated impacts of alternative(s) being carried forward
- Justification of GDOT’s Preferred Alternative as preliminary Least Environmentally Damaging Practicable Alternative (LEDPA)

- Agree or disagree with preliminary LEDPA

### Corps letter to agencies recapping results of discussion & providing concurrence on preliminary LEDA (or lack of concurrence)

- Identification of preliminary LEDPA

A3M (Avoidance & Minimization Measures Meeting) is attended by design & environmental staff to evaluate measures to further avoid & minimize impacts to environmental resources and results in the identification of a preferred alternative.

Also, Aquatic Resources Delineation Verification Request (ARDVRq) may be submitted to the Corps before or after A3M.
Checkpoint #3
Preliminary LEDPA

• **Information provided**
  ✓ PAR report
  ✓ Comparison of anticipated impacts for each alternative
    o “Apples to apples” comparison
    o Field work results for existing widening
    o Agreed upon comparison from Checkpoint #2, if field work not done
  ✓ Justification for Department’s Preferred Alternative being the preliminary LEDPA

• **Outcomes**
  ✓ Agreement on preliminary LEDPA
Least adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences

40 CFR 230.10(a)
• Prior to interagency meeting
  ✓ 30 business days – Department submits copy of PAR report to Corps
  ✓ 20 business days – Corps provides comments to Department or confirms PAR report is ready to transmit
  ✓ 15 business days – Department transmits PAR report to resource agencies
Corps agrees that preferred alternative is preliminary LEDPA
✓ Provides concurrence letter to Department within 10 business days of PAR meeting

Corps disagrees that preferred alternative is preliminary LEDPA
✓ Corps conducts an independent analysis of the project and apprises Department of its findings within 20 business days of PAR meeting
Project Advancement Post-PAR

- Concept approval
- A3M – Avoidance & Minimization Measures Meeting
- Environmental technical studies
- NEPA document (if federal-aid)
- Preliminary Field Plan Review (PFPR)
- ROW authorization
- 404 permit application
- Final Field Plan Review (FFPR)
- Construction
• **Project identification**
  ✓ Funding years
  ✓ Funding source
  ✓ Schedule

• **Three checkpoints**
  1. Early coordination/Need & Purpose
  2. Pre-application/Alternatives
  3. Preliminary LEDPA

• **Option to combine Checkpoints #1 & #2**

• **Advance preliminary LEDPA**
Questions?
Schedule & Contract Considerations

- P6 activities
- Contract scope
• Checkpoint 1a – “Introduce Project to Agencies” (Activity 01712)
  ✓ Follows Project Framework Agreement and Procurement
  ✓ No concurrent P6 design activities

• Checkpoint 1b – “Decide if PAR process will continue” (Activity 01719)
  ✓ Completes Checkpoint #1
• Checkpoint 2a – “Evaluation for alternatives carried forward” (Activity 01732)
  ✓ Precedes start of concept development activities
  ✓ No concurrent P6 design activities
  ✓ Precedes environmental resource identification

• Checkpoint 2b – “Agency evaluation of alternatives” (Activity 01742)
• Checkpoint 2c – “Submit range of alternatives” (Activity 01749)
  ✓ Completes Checkpoint #2

• P6 successor activities
  ✓ Start concept activities
  ✓ Start environmental resource identification
Generally begins following identification of environmental resources

Checkpoint 3a – “Prepare PAR report” (Activity 01762)

Checkpoint 3b – “Review of PAR report” (Activity 01772)
P6 Activities – Checkpoint #3 (cont’d)

• Checkpoint 3c – “Hold Interagency PAR meeting” (Activity 01782)

• Checkpoint 3d – “Submit least damaging alternative” (Activity 01799)
  ✓ Completes Checkpoint #3

• Followed by design activity
  ✓ Finalize Concept Report (Activity 19362)
• Consideration of work completed to date
• Discussion with Corps on appropriate "jumping on" point
# Information Provided

## Checkpoint #1

<table>
<thead>
<tr>
<th><strong>Preliminary Need &amp; Purpose</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Logical Termini &amp;/or Independent Utility</strong></td>
</tr>
<tr>
<td><strong>Funding source &amp; lead federal agency</strong></td>
</tr>
<tr>
<td><strong>Criteria for evaluating alternatives prior to field work</strong></td>
</tr>
</tbody>
</table>

## Checkpoint #2

| **Alternatives being considered for advancement** |
| **Proposed survey boundary for the PAR** |
| **Level of field work (if any) for alternatives being advanced** |
**Checkpoint #1**

<table>
<thead>
<tr>
<th></th>
<th>Preliminary Need &amp; Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Logical Termini &amp;/or Independent Utility</td>
</tr>
<tr>
<td></td>
<td>Funding source &amp; lead federal agency</td>
</tr>
<tr>
<td></td>
<td>Criteria for evaluating alternatives prior to field work</td>
</tr>
</tbody>
</table>

**Checkpoint #2**

<table>
<thead>
<tr>
<th>Alternatives being considered for advancement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed survey boundary for the PAR</td>
</tr>
<tr>
<td>Level of field work (if any) for alternatives being advanced</td>
</tr>
</tbody>
</table>
### Checkpoint #1

| ✓ | Preliminary Need & Purpose |
| ✓ | Logical Termini &/or Independent Utility |
| ✓ | Funding source & lead federal agency |
| ✓ | Criteria for evaluating alternatives prior to field work |

### Checkpoint #2

| ✓ | Alternatives being considered for advancement |
| N/A | Proposed survey boundary for the PAR (new location) |
| ✓ | Level of field work (if any) for alternatives being advanced |
• Include tasks and hours in Task Order for concept development
• Include separate tasks and hours for each checkpoint in workhour spreadsheet
Additional PAR Activities Not Included in Project Scopes

- **Checkpoints #1 & #2**
  - ✓ Interagency meeting and notes
  - ✓ Memo on results of background research & early coordination (if PTIP report doesn’t include)
  - ✓ Compilation of information
  - ✓ Letter recapping discussion

- **Checkpoint #3**
  - ✓ PAR Report
  - ✓ Meeting notes
P6 activities for each checkpoint

Transitioning legacy projects – consider work completed to date

Activities and hours included in concept development task order
Questions?
Anticipated Benefits

- Early agency engagement
  ✓ Eliminate delay due to late concerns with termini
- Limit cycles of alternative considerations
  ✓ All environmental disciplines part of discussion
- Outcomes of each checkpoint stipulated
  ✓ Corps agrees or disagrees with preliminary LEDPA
Least Environmentally Damaging Practicable Alternative

Least adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences

40 CFR 230.10(a)
Planned Guidance Material

• Overview and pre-Checkpoint #1 guidebook
• Checkpoints #1 and #2 guidebook (including checklists)
• Template for information provided during Checkpoints #1 & #2
• Checkpoint #3 (PAR report) guidebook
• Transitioning legacy projects guidance
• Roles and responsibilities guidebook
• PAR report outline/template
Activities leading to rollout

✓ July 22 – preview rollout with ecologists
✓ July 26 – draft guidebook outlines
✓ August 1 – meet with practitioners from different offices to discuss rollout
✓ August 19 – draft guidance material
✓ August 28 – signing ceremony!
✓ September 5 – introduction to GPTQ ecology subcommittee
✓ September 11 – pilot rollout