

CHAPTER VIII – COMMITMENTS TABLE (aka GREEN SHEET)

All National Environmental Policy Act (NEPA) documents require an [Environmental Commitments Table](#) (Green Sheet), a matrix (printed on green paper) that captures and tracks every commitment made during the environmental process.

Since the environmental document is completed fairly early on in project development, many efforts to avoid, minimize, or mitigate harm to environmental resources take the form of commitments. Therefore, the Green Sheet is drafted and updated as commitments are made and includes:

- The commitment made,
- An indication of how it will be administered (e.g., include it on the plans or as a special provision),
- Who is responsible for carrying it out,
- The estimated cost associated with implementing the commitment, and
- The status of the commitment.

Environmental commitments **MUST** be coordinated with the project team, especially the office responsible for carrying it out. **Every commitment made must be reasonable and doable.** Commitments should not be made for the sole purpose of moving a project through the environmental process without consideration of the likelihood that the commitment can be carried out. Therefore, the Responsible Office must concur in writing (an e-mail is acceptable) that the commitment is reasonable and doable.

This matrix also divides commitments based on when during the project's life they must be fulfilled. The table includes specific sections for each of the following:

- Pre-construction,
- During construction, and
- Post construction.

The Green Sheet follows the project throughout its development, so the header will indicate what phase the project is in and the date the Green Sheet was last updated.

The Georgia Department of Transportation (GDOT) is legally bound to fulfill all commitments made. However, the Green Sheet does not create a contractual obligation between GDOT and the contractor selected to construct the project. Therefore, an Environmental Resource Impact Table must be included in the General Notes section of all plans (if the project does not include any environmental commitments, this table will show "none"). This table will describe the type of environmental resource, the location of the resource on the plans, the type of construction activity planned, what is permitted, the controlling criteria, any required Special Provisions, and any additional comments deemed important for project construction personnel and contractors.

The Environmental Resource Impact Table template includes examples of the required entries. The designer of record is responsible for inserting the Environmental Resource Impact Table into the project plans. The General Notes sheets of both the roadway plans and the erosion control plans must include this table. The NEPA analyst for the project will confirm the accuracy of its content.

The Environmental Resource Impact Table must be closely coordinated with the project Green Sheet. As noted above, the environmental analysis is completed early on in project development so many efforts to avoid, minimize, or mitigate harm to environmental resources take the form of commitments. Including these commitments as part of the project plans and contract documents ensures that they get carried out during construction. Having the Environmental Resource Impact Table as part of the contract documents also ensures that environmental impacts reported and permitted during the environmental analysis are not increased during construction.

1.0 Common Commitments

The environmental commitments listed below are not all inclusive; there may be other environmental commitments required for a project that are not as common as those noted. A commitment may appear on the commitments table more than once (e.g., a commitment made to delineate resources and install orange fabric safety fencing on project plans during the pre-construction phase will appear during the construction phase requiring the contractor to install and maintain the fencing).

1.1 Delineations

The [Plan Development Process](#) (PDP) requires project plans address environmental features. Environmental resources will be delineated on the plans to ensure that the designer remains aware of these sensitive resources while the project advances and also to ensure that the contractor does not damage them during construction. Construction plans should show the boundaries of:

- Historic properties,
- Cemeteries,
- Wetlands,
- Streams and their appropriate buffers,
- Open waters and their appropriate buffers,
- Populations of protected species.

Any plan section that supports a roadway project and covering an activity that could affect environmental resources also must have the boundaries of environmental resources shown to ensure that the individual designing the action and the contractor carrying it out are aware of the environmental resources. The delineated area will be marked as an "Environmentally Sensitive Area" (ESA) with a note referring the contractor to the General Notes sheets for construction restrictions noted in the Environmental Resource Impact Table. Plan sections that may need the boundaries of all environmental resources delineated could include (but are not

limited to) construction staging plans, utility relocation plans, signing & marking plans, signal plans, Advanced Traffic Management Systems [ATMS]/Intelligent Transportation Systems [ITS] plans, landscaping plans, erosion control plans, lighting plans, bridge plans, traffic safety & design plans, landscaping plans, noise barrier plans and mitigation plans. Please see the GDOT's [Plan Presentation Guide](#) (PPG) outlining where and how environmental resources will be displayed.

1.2 Plan Notes

Plan notes often ensure that efforts to minimize impacts to environmental resources are carried out. Typical items that require plan notes and are included on the Green Sheet:

- Noise barrier locations,
- Landscaping at historic properties, including plantings in the median of new four-lane roadways,
- In-kind re-planting of vegetation that will be removed at historic resources,
- Historic markers (location of and removal notation),
- Soil excavation from a Underground Storage Tank (UST)/Hazardous Waste site, or
- Fencing during construction to protect a sensitive environmental feature (e.g., contributing elements of historic properties, habitat, or buffers). Please note that if the project impacts an environmental resource, the orange fencing will be placed at the edge of the impact area (required ROW or construction limits, as appropriate) to ensure that the impact disclosed in the NEPA document does not increase during construction.

1.3 Permits

All required permits are listed in the Green Sheet, such as:

- Section 404 permits (including if a Pre-Construction Notification [PCN] or Joint Public Notice [JPN] is required),
- Buffer Variances (BV),
- Tennessee Valley Authority (TVA) permits,
- NPDES, or
- Cemetery permits.

1.4 Special Provisions

Special provisions are added to the construction contract to protect environmental resources. Typical examples include:

- Platform construction at bridges that span waterways with protected aquatic species,
- Work cessation if a protected species is spotted during construction,
- Water quality monitoring during construction,
- Archaeological monitoring during construction, or
- Time restrictions on construction (e.g., no work on a bridge during bird nesting or during fish spawning).

All special provisions cited in the Green Sheet are to be attached for ease of reference.

1.5 Mitigation

The Green Sheet also documents mitigation required for unavoidable losses, including:

- Section 106 mitigation (e.g., Historic American Building Survey [HABS]/Historic American Engineering Record [HAER] documentation, historic structure relocation),
- Stream mitigation,
- Wetland mitigation.

2.0 Review of the Green Sheet

The NEPA analyst is responsible for creating and maintaining the Green Sheet. The specialists and the Project Manager (PM) are forwarded the Green Sheet to review and sign before the NEPA document is routed to FHWA (see [Chapter III](#)), before each certification is approved (see [Chapter X](#)), and before it is routed to Engineering Services for inclusion in the FPR Report (see [Chapter X](#)). At that time, the reviewers should verify that all appropriate commitments are listed, that the status of each commitment is up to date, and that any commitment that needs to be completed before the next action is complete. For example:

- The PM and Responsible Office should verify that all commitments are reasonable and doable before the NEPA document is routed to FHWA,
- The historian should verify that any commitment to prepare HABS/HAER or other photo-documentation is complete before right-of-way (ROW) authorization,
- Any commitment that could affect ROW needs should be complete before ROW authorization,
- The PM should verify that all commitments requiring delineations, plan notes, or special provisions are complete before the Final Field Plan Review (FFPR), and
- All pre-construction commitments (including permits and mitigation) must be completed prior to certification for Let (see [Chapter X](#)).

During a reevaluation, commitments shown on a previously approved Green Sheet will be carried forward verbatim. If a commitment has changed or is no longer relevant, an explanation will be provided in the status column.

Remember:

- The Green Sheet must always go on green paper. When reproducing a document for distribution, always put it on green paper.
- Standard specifications (such as erosion control) are omitted since they apply to every project.
- Even projects without commitments will need a Green Sheet.
- Plan sets must include an Environmental Resource Impact Table.
- Additional guidance can be found in the [Environmental Commitments Table Guidance](#) document.
- Subject matter experts must review every version of the Green Sheet. Concurrence should not be assumed.