

Ecology

Section 404 Local Coordination Procedures: Checkpoint 3

Purpose
Best Practices
Checklists

PURPOSE

Following the Local Coordination Procedures (LCP), project coordination will occur in up to three coordination steps named Checkpoints 1, 2, and 3. This guidebook provides recommendations and checklists to prepare for and complete Checkpoint 3, the presentation and report to address Practicable Alternatives Review (PAR) requirements. The following best practices and linked checklists will be updated periodically in response to feedback on the LCP process.

Defining Anticipated Permit

Preliminary screening and impact estimates through Checkpoint 2 provide a basis to identify the likely Section 404 permit. As the analysis proceeds from Checkpoint 2 to Checkpoint 3, the project team may focus on particular locations along the alignment for additional investigation remotely or in the field. In the case of a proposed widening, field data collection along the entire project corridor may be practical. Findings associated with these efforts may affect the assumptions for the needed permit through impact thresholds or project-specific conditions. Be mindful of potential impacts associated with crossroad tie-ins. Please refer to the *Section 404 Permit* guidebooks for more about permit types.

The Checkpoint 3 steps are required for those projects within the impact thresholds and project definition of Regional General Permit (RGP) 35 or an Individual Permit (IP), as defined in the conditions of the US Army Corps of Engineers (USACE) 2018 Regional General Permits. Per the LCP, the coordination can end at any time if it is virtually certain the project would qualify for a Nationwide General Permit (NWP) or RGP 30-34. However, a subsequent change in project design could increase anticipated impacts such that the project would be more likely to require an IP or RGP 35. The project ecologist should keep the team apprised of the anticipated permit and the applicability of the LCP.

Practicable Alternatives Review

Once a project has been coordinated through Checkpoints 1 and 2 (typically a major widening or new location project) with impacts requiring an IP or RGP 35, planning and analysis should begin for the PAR process. Careful coordination among the GDOT PM, Environmental Analyst, roadway designers, and other project team members can ensure the process is completed without schedule delays. Activities leading up to the PAR meeting may vary in duration depending on the complexity and progress of the project design and range of alternatives being considered.

BEST PRACTICES

Preparing for Checkpoint 3

With the project ecologist taking the lead role unless otherwise noted, the project team should consider and adapt these approaches along with the Checklist for Checkpoint 3 to complete the LCP steps for the project.

Approaches for Analysis and Mapping

- > Confirm with the design team and GDOT PM that the design files used for field work are current, presented with a consistent level of detail and coverage to support each build alternative being considered.
- > The project team may focus on areas of interest along the alignment, particularly if those areas are identified by stakeholders at Checkpoint 2. The extent of field data collection, if any, will also be informed by coordination at Checkpoint 2; it could range from enhanced mapping to complete field delineations or a combination of methods. Begin planning for the PAR process immediately following the Checkpoint 2 documentation to ensure the schedule will allow for the agreed upon data collection by each discipline.
- > Remember that the PAR focus will be on a range of alternatives to reach agreement on the (preliminary) least environmentally damaging practicable alternative (LEDPA). Ultimately, the determination that a project represents the final LEDPA is a USACE responsibility during the Section 404 permit review. After the PAR process, the GDOT PDP includes additional steps to avoid or minimize impacts. The avoidance, minimization, and mitigation meeting (A3M) will look more closely at the resources and alignment in a separate process (refer to the general guidebook *Project Milestones Guidebook* for more about the A3M).
- > Collect available data across all applicable resource concerns to show consistency with Section 404(b)(1) as well as other laws including Section 106, Section 4(f), and Section 7. Relevant environmentally sensitive areas (ESAs) may include wetlands, streams, open waters, state-mandated buffers, protected species, historic or archaeological sites eligible for the National Register, cemeteries, and publicly-

owned recreational facilities. The ESAs located within or adjacent to each alternative should be mapped for consistency.

- > Create GIS overlay maps to show any adjacent projects that could change the existing conditions for the subject project.
- > Organizing data for ESAs and other features in GIS layers allows for efficient comparisons of alternatives at a specific resource.

Report Preparation

- > While some key elements of a PAR report will be consistent across projects, each report must also adapt to project-specific conditions.
- > Employing matrix-based approach can be an effective way to compare estimated resource impacts along various alternatives
- > Focus on clarity of the comparison over bulk in the report text. Aerial map figures with detailed labels are effective in showing impact areas; format any shading, screening, and labels for easy reading on screen and in print.

PAR Presentation

- > Consider using PowerPoint and GIS applications that can support interactive map discussions during the PAR presentation. Coordinate audio-visual equipment needs in advance. If display boards are preferred over digital files, review the room layout and space needed in advance.
- > Confirm the speaking roles of team members and conduct a dry run to improve the effectiveness of the presentation and subsequent agency discussion.
- > Depending on the location of the meeting, space for attendees can be limited. Consider the total number of attendees and ensure seating capacity in the meeting room would allow clear views of the presentation.
- > Anticipate likely agency questions/comments in advance and prepare a fact sheet and/or presentation slides that help the project team answer those questions.

CHECKLISTS

A checklist to prepare for and complete Checkpoint 3 is available here:

LCP Checkpoint 3 Checklist

**GDOT Office of Environmental
Services**

Guidebook Revision History

Revision Description	Relevant Sections	Revision Date
Initial Publication	All	10/8/2020