Ecology

Section 404 Local Coordination Procedures - Checkpoints 1 & 2

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 coordination is needed for major widening and new location projects as well as any other projects likely to require a Regional General Permit (RGP) 35 or an Individual Permit (IP) (*e.g.*, a bridge replacement in the coastal plain). This guidebook provides recommendations and checklists to prepare for and complete Checkpoints 1 and 2. Depending on the complexity of the project, the preliminary range of alternatives, and project status at the initiation of LCP coordination, these checkpoints may be separate or combined into one meeting. The following best practices and linked checklists will be updated periodically in response to feedback on the LCP process.

BEST PRACTICES

Unless otherwise specified, the primary responsibility of these tasks lies with the project ecologist assigned to the project.

Preparing for Checkpoint 1

Initial Project Documentation

> Some projects may warrant a modified approach, particularly Legacy Projects. The term “Legacy Project” is used here to describe a project that advanced beyond Concept Approval prior to implementation of the current LCP agreement (effective date of August 28, 2019). Please refer to the *Section 404 Local Coordination Procedures: Legacy Projects* guidebook for more information. Unless the LCP process is modified, such as for a Legacy Project, the stepwise process will proceed from Checkpoint 1 onward.

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> If the project team is certain that an RGP 35 or IP will not be required, prepare a letter "opting out" of the LCP, explaining why further LCP coordination is not needed. This letter should not request a response from the agencies.

> For projects that cannot "opt out" of the LCP, begin by collecting any documents, maps, and other files available from GDOT records on a specific project. This effort will help determine how the project will progress through the LCP process.

> Compile the following information: Project Justification Statement, location of the proposed transportation improvements, a preliminary schedule, and preliminary budget. This information is generally a product of the Project Team Initiation Process (PTIP). The PTIP report should provide an effective starting point to consider whether the project will follow the LCP process.

> Review readily available desktop mapping for Waters of the US (WOTUS) within the general project area either during early screening to support the PTIP or otherwise immediately following the PTIP. Create a map showing the project area and nearest WOTUS including the source and date of the data.

> Confirm whether the preliminary scope of the project would require major widening, new location, or some other type of project likely to have substantial impacts within adjacent WOTUS. The LCP is intended to screen projects early in their development. By addressing 404(b)(1) considerations early, the process is intended to minimize regulatory uncertainty. This goal is achieved by identifying early those projects that are most likely require a RGP 35 or IP.

> Confirm the project's preliminary Need and Purpose (N&P). At this stage, the discussion of the transportation problem and estimated project limits will be sufficient. While a final N&P statement with traffic analysis data is not required for Checkpoint 1 and likely will not be available, the preparation should include a preliminary justification of the project's logical termini for discussion.

Early Coordination Meeting with Agencies

> Coordinate with the Project Manager, Environmental Analyst, and technical specialists (environmental and design) with GDOT and consultant team to determine attendees, materials to share, speaking and support roles, and needed outcomes well in advance of the Checkpoint 1 meeting.

> Plan well in advance of Checkpoint 1 and confirm the discussion format and expected duration, which typically will occur during video conference or an in-person meeting (or a hybrid). The LCP also allows for the checkpoint discussion to occur via email.

> Match the format of materials to the agreed upon meeting type to assure all participants have access, which could include handouts during the meeting or PDF files along with presentation slides for anyone attending remotely.

> Keep the focus during this meeting on Checkpoint 1, which does not include detailed discussion of the project N&P or alternatives. The meeting facilitator should be prepared to emphasize this if the Key Agencies and Commenting Resource Agencies are interested in more details.

Next Steps

> Leave the Early Coordination meeting with a clear understanding of any agency concerns expressed about the project area or resources. Ask follow-up questions for any needed clarification and confirm agreement on the discussion points through the written comments and responses on Checkpoint 1.

> Make sure the meeting notes and GDOT letter capture accurate and complete details for future use with Checkpoint 2. Save PDF copies of any LCP correspondence (including emails) in a GDOT ProjectWise folder reserved for future LCP coordination. Note in this letter that a response is not needed.

Preparing for Checkpoint 2

Defining Range of Alternatives

> Think ahead to the analysis for Checkpoint 3, which will require a consistent level of detail for all alternatives that are discussed in the PAR document. Make sure that project design staff are prepared to develop the files for each proposed build alternative with the same level of detail to support the PAR analysis.

> A reasonable range will vary depending on the project type, with a widening project generally having fewer distinct alternatives than a new location project.

> Refer to the *Alternatives Analysis* guidebook, found with OES's General guidebooks for all environmental practitioners, for additional assistance on developing alternatives for consideration.

Desktop Research and Resource Mapping

> Set up the base mapping for Checkpoint 2 figures so that it is consistent with and ready for additional data use in Checkpoint 3.

> Apply geographic information system (GIS) tools to create maps, using color themes and other features to display the desktop resources and proposed alternatives effectively so that reviewers can grasp the project conditions easily and provide meaningful input.

Pre-Application Meeting with Agencies

> Coordinate with the Project Manager, Environmental Analyst, and technical specialists with GDOT and consultant team to determine attendees, materials to share, speaking

and support roles, and anticipated outcomes well in advance of the Checkpoint 2 meeting.

- Include figures and discussion about proposed field data collection including geographic scope and level of detail for each alternative and timing of future steps including aquatic resource verification required by the US Army Corps of Engineers (USACE).
- While preparing materials for the meeting, confirm availability of any video, webinar, or call-in equipment needed to support the discussion (at least 20 business days in advance, to make sure intended format can be supported).
- Assign roles/tasks to prepare and review the draft handout and discussion materials so that they can be delivered at least 15 business days in advance of the meeting date. Any images/content intended during the meeting should be included in the submittal.
- If an update to the presentation becomes necessary after the submittal, provide the edited file(s) as soon as possible before the meeting.
- While the display method for the meeting is optional, focus on making sure any maps or project site images are highly visible at an effective scale in a typical conference room setting or computer screen. Using desktop applications such as PowerPoint with a monitor can provide flexibility to adjust the scale and zoom in during discussion.

Next Steps

- Leave the Pre-Application meeting with notes about action items and any agency concerns expressed about the alternatives, field work, or survey locations. Ask follow-up questions for any needed clarification and confirm agreement on the discussion points through the written comments and responses on Checkpoint 2.
- For projects anticipated to require an RGP 35 or IP and thus advance to Checkpoint 3, make sure the meeting notes and GDOT letter capture accurate details for use with Checkpoint 3, particularly the decision to move forward with a PAR, the level of field work, any methodologies requested for survey boundaries, and timing of USACE verification of aquatic resources. Coordinate with GDOT PM to confirm any scope/contract requirements to move forward.
- Add PDF copies of relevant LCP correspondence (including emails) into the LCP coordination folder.
- If advancing to Checkpoint 3, create a draft timeline for design and environmental field work to collect the data needed well in advance for Checkpoint 3.

CHECKLISTS

Checklists to prepare for and complete Checkpoints 1 and 2 are available on the guidebook website linked at the beginning of this guidebook.

Guidebook Revision History

Revision Description	Relevant Sections	Revision Date
Initial Publication	All	10/8/2020
Updated Acronyms, Hyperlinks	All	12/09/2020
Updated Hyperlink Buttons	Checklists	4/22/2021
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