

# PERMITTING ROLES AND RESPONSIBILITIES

Central Federal Lands Highway Division

Approved: \_\_\_\_\_

A handwritten signature in blue ink, appearing to read 'F. D. ZMAH', is written over a horizontal line.

Date: 18 October 2010

## Table of Contents

Acknowledgements .....	1
Acronyms .....	2
Summary.....	3-5
Roles and Responsibilities Matrix (CFL Acquired Permits).....	6-7
Roles and Responsibilities Matrix (NPS/FWS Acquired Permits).....	8-9
Appendices.....	V1
A –Clean Water Act Flow Chart .....	V2-V4
B – Key Definitions.....	V5
C – Milestone Activity Deliverables.....	V6-V7
D – Example Project Schedule.....	V8
D – Permit Documentation Checklist.....	V9

## **Acknowledgements**

The Federal Highway Administration (FHWA) gratefully acknowledges the contributions to these roles and responsibilities from the following individuals and groups. Their efforts greatly assisted the project to meet managements expectations for these guidelines:

### **Steering Group**

- J. Michael Will (Team Leader)
- Rick Cushing
- Tracy Piparato
  
- Ed Hammontree (Team Sponsor)

### **Contributors**

- Project Development Branch
- Technical Services Branch
- Construction Branch
- Project Delivery

## **ACRONYMS:**

A/E	Architectural Engineering Firm
BO	Biological Opinion
Cat-X	Categorical Exclusion
CFL	Central Federal Lands Highway Division, FHWA
CFR	Code of Federal Regulations
CFT	Cross Functional Team
COE	Construction Operations Engineer (CFL Construction Branch position)
CWA	Clean Water Act
EPA	Environmental Protection Agency
FHP	Forest Highway Program
FHWA	Federal Highway Administration
FWCA	Fish and Wildlife Coordination Act
FWS	Fish and Wildlife Service
FS	Forest Service
FONSI	Finding of No Significant Impact
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NPS	National Park Service
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
OHWM	Ordinary High Water Mark
PE	Project Engineer
PM	Project Manager
PDT	Project Delivery Team
PRPP	Park Roads and Parkway Program
PS&E	Plans, Specifications, and Estimates
RRP	Refuge Roads Program
ROD	Record of Decision
SEE	Social, Economic, and Environment Study Team
SWPPP	Storm Water Pollution Prevention Plan
USACE/COE	United States Army Corps of Engineers
WUS	Waters of the United States

## **Introduction**

The CFL permits Team was chartered in June 2009 to develop guidelines for the roles and responsibilities as they relate to the full life cycle of Permits typically encountered on CFL projects. The objective of the team was to formalize roles and responsibilities where no formal process had been previously developed. The team received guidance from the Branch Chiefs with input from CFLHD staff to develop the guidelines. The guidelines are endorsed by the CFLHD Leadership team and are intended to serve as a guide for the development, monitoring, and closeout of the Clean Water Act and the NPDES permits.

## **Background**

Recognizing the importance of maintaining positive relationships with the federal resource agencies responsible for administering and enforcing regulatory requirements relating to construction permitting, the CFL Leadership Team identified the need to enhance and formalize process to ensure consistent adherence to the regulatory requirements. The need to enhance and formalize process has become increasingly apparent due to recognizing the occasional fundamental shortcomings that could result in program oversights, problems, and concerns. Some general, but common examples follow:

- Notices of Termination (NOT) are not consistently being filed.
- Inconsistencies commonly occur in the management of permit tasks. For example, not knowing who is responsible for filing the NOT has resulted in an NOT being filed on one project but not the next.
- Undefined roles and responsibilities have hampered effective inter-office and office-field communication and coordination of required program activities. This applies to both internal and oversight activities for consultant delivered projects.
- Lack of means and methods to monitor permit status particularly relating to permit renewal. Given the variability of permit renewal dates, the inability to effectively monitor expiration has resulted in permits lapsing.

The examples identified above represent unnecessary risk that if left unaddressed, could have the potential to negatively impact CFL credibility and create financial burden from a regulatory standpoint.

## **Approach**

Given some of CFL's prior challenges with tracking, renewal, transfer, and closure of CFL permits, a method for creating transparency was identified as a necessary means to capture the process, keep those involved informed, and create awareness to those who are responsible and for what part of the process that they are responsible for. Additionally the R&R will enable team members to know what is expected of them, in terms of both products, level of effort, and what they can expect of by others. By removing the uncertainty, the project team can more effectively and collaboratively ensure adherence to the regulatory requirements. In addition to formalizing the roles and responsibilities, the permitting team is also proposing to add additional Primavera activities to track permit renewal dates and permit closure/transfer. The addition of these activities, will act as necessary triggers to assist CFL in maintaining/ monitoring/fulfilling commitments to the involved regulatory agencies. Given that most projects encountered typically involve either/both the Corps of Engineers regulatory office or a State Department for storm water discharge, emphasis was placed on the Clean Water Act and NPDES.

## Implementation

### Roles and Responsibilities

The following five defined roles represent and identify various levels of engagement throughout the lifecycle of standard CFL permits. Each discipline of the Project Delivery Team (PDT) will have differing roles for different tasks. The roles are briefly described below:

1. Accountable: Those who are ultimately accountable for the correct and thorough completion of the deliverable or task, and the one to whom *Perform* is accountable. In other words, an *Accountable* must sign off (approve) on work that *Perform* role provides. There must be only one *Accountable* specified for each task or deliverable.
2. Perform: Those who do the work to achieve the task. There is typically one role with a participation type of *Perform*, although others can be delegated to assist in the work required.
3. Consulted: Those whose opinions are sought; and with whom there is two-way communication.
4. Informed: Those who are kept up-to-date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication.
5. Out of the Loop (or Omitted): Designating individuals or groups who are specifically not part of the task. Specifying that a resource does not participate.

With the above defined roles, there should be no ambiguity that the individual identified with the *Accountable* role is ultimately the owner of the task and responsible for the end result, the *Perform* role is responsible for getting the work done, the *Consulted* role will assist the PDT with input on the activity, the *Informed* role is notified of task activities, and the *Out of the Loop (or Omitted)* role for those disciplines in which the activity does not require their participation.

The roles and responsibilities presented are expected to be used as guidelines. It is anticipated that some adaptation of the guidelines will be required to adjust to the specific needs of the project.

### A/E Delivery

As a result of an increased program, the use of the traditional fixed staff delivery model has been complimented with the additional use of full service A/E contractors for the delivery of entire projects. For the purpose of defining roles and responsibilities as it relates to the A/E delivery of CFL project permitting, the expectations of the A/E will be consistent with what would be expected of CFL's internal staff. Additionally, the roles and responsibilities for CFL's internal staff for oversight of the A/E delivery model will be consistent with that of the A/E Oversight Guidelines which can be found under the following web address

<http://www.cflhd.gov/resources/pm/presentations.cfm> .

## Primavera Activities

To effectively prioritize, plan, manage and execute the various tasks associated with CFL permitting, several activities are included in the scheduling software currently used by CFL. The following four activities were identified as necessary components to effectively track the permitting process:

### E4.1 Permit Development - Assess and establish permits as required.

- Coordinate with PDT for project information; review file documentation, research Fed, State & Local permit needs
- Coordinate with Federal/State regulatory agencies to obtain permit application requirements.
- Prepare 404/401/NPDES permit applications.
- Submit applications to the regulatory agencies.
- Receive permits, distribute, and electronically archive.
- In coordination with the Project Manager, setup activity E4.2 and/or E4.3 expiration dates in Primavera.

### E4.2 Permit – 404 Renewal

- Prepare and submit permit reissuance documentation in coordination with the Project Manager.

### E4.3 Permit – NPDES Renewal

- Prepare and submit permit reissuance documentation.

### E4.4 Permit Closeout/Transfer

#### 404/401 Permit

- Determine if permit conditions have been met and a 404 certification of compliance can be filed in coordination with the Project Manager and Construction Operations Engineer.
- Prepare and submit 404 certification of compliance.

#### NPDES Permit

- Coordinate with Project Manager to determine if the project NPDES will be transferred to the maintaining agency; or, if permit conditions have been met, file the NOT without transfer.
  - Transfer
    - Compile maintenance plan (SWPPP) including project records for transferred agency.
    - Prepare NOT and subsequent maintaining agency NOI and provide to the Project Manager for appropriate signatures.
    - Submit NOT and accompanying NOI.
  - Closeout
    - Compile documentation validating permit conditions have been met.
    - Prepare and submit NOT

**ROLES AND RESPONSIBILITIES:**

Using an expanded version of the RACI Matrix in Project Management, the roles and responsibilities are defined as follows by PACIO:

(P) PERFORM – Those who do the work to achieve the task. There is typically one role with a participation type of *Perform*, although others can be delegated to assist in the work required.

(A)ACCOUNTABLE – Those who are ultimately accountable for the correct and thorough completion of the deliverable or task, and the one to whom *Perform* is accountable. In other words, an *Accountable* must sign off (approve) on work that *Perform* provides. There must be only one *Accountable* specified for each task or deliverable.

(C)CONSULTED – Those whose opinions are sought; and with whom there is two-way communication.

(I)INFORMED – Those who are kept up-to-date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication.

(O)OUT OF THE LOOP (or OMITTED) – Designating individuals or groups who are specifically not part of the task. Specifying that a resource does not participate.

<b>ROLES AND RESPONSIBILITIES – FHWA PREPARES/OBTAINS PERMIT</b>									
Activity/Task	PM	NPS Environment for PRPP	CFL Environment for FHP	FWS Environment for RRP	CFL Permits	Design	Hydraulics	COE	Project Engineer
IDENTIFICATION									
PRPP	A	P	O	O	I	C	C	O	O
FHP	A	O	P	O	I	C	C	O	O
RRP	A	O	O	P	I	C	C	O	O
DOCUMENT RESULTS: Scoping									
Report PRPP	A/P	C	I	O	I	C	C	O	O
Scoping Report FHP	A/P	O	C	O	I	C	C	O	O
Scoping Report RRP	A/P	O	I	C	I	C	C	O	O
WUS Delineation Report	A	P	P (FHP) / O (PRPP/RRP)	P	C	I	C	O	O
EVALUATION – evaluate impacts to & importance of the WUS being affected	A	P	P (FHP) / O (PRPP/RRP)	P	C	C	C	O	O
WETLAND FINDING	A	P	P (FHP) / O (PRPP/RRP)	P	C	C	C	O	O
DOCUMENTATION of wetland finding in environmental doc; verify delineations w/ USACE	A	P	P (FHP) / O (PRPP/RRP)	P	C	I	I	I	O
DELIVERABLES (various environmental documents needed for permit application)	A	P	P (FHP) / O (PRPP/RRP)	P	C	P	C	O	O
PERMIT COORDINATION	A	C	C (FHP) / O (PRPP/RRP)	C	P	C	C	O	O



**ROLES AND RESPONSIBILITIES:**

Using an expanded version of the RACI Matrix in Project Management, the roles and responsibilities are defined as follows by PACIO:

(P) PERFORM – Those who do the work to achieve the task. There is typically one role with a participation type of *Perform*, although others can be delegated to assist in the work required.

(A)ACCOUNTABLE – Those who are ultimately accountable for the correct and thorough completion of the deliverable or task, and the one to whom *Perform* is accountable. In other words, an *Accountable* must sign off (approve) on work that *Perform* provides. There must be only one *Accountable* specified for each task or deliverable.

(C)CONSULTED – Those whose opinions are sought; and with whom there is two-way communication.

(I)INFORMED – Those who are kept up-to-date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication.

(O)OUT OF THE LOOP (or OMITTED) – Designating individuals or groups who are specifically not part of the task. Specifying that a resource does not participate.

<b>ROLES AND RESPONSIBILITIES – FHWA PREPARES/OBTAINS PERMIT</b>									
Activity/Task	PM	NPS Environment for PRPP	CFL Environment for FHP	FWS Environment for RRP	CFL Permits	Design	Hydraulics	COE	Project Engineer

PREPARE/SUBMIT PERMITS	A	C	C (FHP) / O (PRPP/RRP)	C	P	C	C	O	O
PERMIT ISSUED- ACCEPT PERMIT CONDITIONS	A/P	C	P (FHP) / O (PRPP/RRP)	C	C	C	C	I	I
PERMIT INCLUDED IN PS&E BID DOCUMENTS	A/P	O	O	O	O	P	O	C	O
REVIEW PERMIT CONDITIONS WITH CONTRACTOR	I	O	O	O	O	O	O	A	P
TRACK PERMIT STATUS	A	O	O	O	P	O	O	I	I
RENEW PERMIT	A	O	O	O	P	O	O	I	I
IMPLEMENT PERMIT CONDITIONS INCLUDING MITIGATION	C	C	C (FHP) / O (PRPP/RRP)	C	C	C	C	A	P
PERFORM WETLAND &/OR WATERS OF THE U.S. MITIGATION MONITORING	A	C	P (FHP) / O (PRPP/RRP)	C	C	O	O	O	O
PERMIT <u>TRANSFER (NPDES)</u> OR <u>CLOSEOUT (NPDES &amp; 404)</u>	A	C	I (FHP) / O (PRPP/RRP)	C	P	O	O	C	C
Permit conditions are met prior to final inspection	A	C	I (FHP) / O (PRPP/RRP)	C	P	O	O	C	C
Long term monitoring is required (404)	A	C	C (FHP) / O (PRPP/RRP)	C	P	O	O	O	O

**ROLES AND RESPONSIBILITIES:**

Using an expanded version of the RACI Matrix in Project Management, the roles and responsibilities are defined as follows by PACIO:

(P) PERFORM – Those who do the work to achieve the task. There is typically one role with a participation type of *Perform*, although others can be delegated to assist in the work required.

(A)ACCOUNTABLE – Those who are ultimately accountable for the correct and thorough completion of the deliverable or task, and the one to whom *Perform* is accountable. In other words, an *Accountable* must sign off (approve) on work that *Perform* provides. There must be only one *Accountable* specified for each task or deliverable.

(C)CONSULTED – Those whose opinions are sought; and with whom there is two-way communication.

(I)INFORMED – Those who are kept up-to-date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication.

(O)OUT OF THE LOOP (or OMITTED) – Designating individuals or groups who are specifically not part of the task. Specifying that a resource does not participate.

ROLES AND RESPONSIBILITIES – NPS / FWS PREPARES/OBTAINS PERMIT									
Activity/Task	PM	NPS Environment for PRPP	CFL Environment for FHP	FWS Environment for RRP	CFL Permits	Design	Hydraulics	COE	Project Engineer

IDENTIFICATION									
PRPP	A	P	O	O	O	C	C	O	O
RRP	A	O	O	P	O	C	C	O	O
DOCUMENT RESULTS:									
Scoping Report PRPP	A/P	C	O	O	O	C	C	O	O
Scoping Report RRP	A/P	O	O	C	O	C	C	O	O
WUS Delineation Report	A	P	O	P	O	I	C	O	O
EVALUATION – evaluate impacts to & importance of the WUS being affected	A	P	O	P	O	C	C	O	O
WETLAND FINDING	A	P	O	P	O	C	C	O	O
DOCUMENTATION of wetland finding in environmental doc; verify delineations w/ USACE	A	P	O	P	O	I	I	I	O
DELIVERABLES (various environmental documents needed for permit application)	A	P	O	P	O	P	C	O	O
PERMIT COORDINATION	A/P	C	O	C	O	C	C	O	O
PREPARE/SUBMIT PERMITS	A	P	O	P	O	C	C	O	O
PERMIT ISSUED- ACCEPT PERMIT CONDITIONS	A/P	P	O	P	O	C	C	I	I
PERMIT INCLUDED IN PS&E BID DOCUMENTS	A/P	O	O	O	O	P	O	C	O

**ROLES AND RESPONSIBILITIES:**

Using an expanded version of the RACI Matrix in Project Management, the roles and responsibilities are defined as follows by PACIO:

(P) PERFORM – Those who do the work to achieve the task. There is typically one role with a participation type of *Perform*, although others can be delegated to assist in the work required.

(A)ACCOUNTABLE – Those who are ultimately accountable for the correct and thorough completion of the deliverable or task, and the one to whom *Perform* is accountable. In other words, an *Accountable* must sign off (approve) on work that *Perform* provides. There must be only one *Accountable* specified for each task or deliverable.

(C)CONSULTED – Those whose opinions are sought; and with whom there is two-way communication.

(I)INFORMED – Those who are kept up-to-date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication.

(O)OUT OF THE LOOP (or OMITTED) – Designating individuals or groups who are specifically not part of the task. Specifying that a resource does not participate.

<b>ROLES AND RESPONSIBILITIES – NPS / FWS PREPARES/OBTAINS PERMIT</b>									
Activity/Task	PM	NPS Environment for PRPP	CFL Environment for FHP	FWS Environment for RRP	CFL Permits	Design	Hydraulics	COE	Project Engineer
REVIEW PERMIT CONDITIONS WITH CONTRACTOR	I	O	O	O	O	O	O	A	P
TRACK PERMIT STATUS	A/P	O	O	O	P	O	O	I	I
RENEW PERMIT	A	P	O	P	O	O	O	I	I
IMPLEMENT PERMIT CONDITIONS INCLUDING MITIGATION	C	C	O	C	O	C	C	A	P
PERFORM WETLAND &/OR WATERS OF THE U.S. MITIGATION-MONITORING	A	P	O	P	O	O	O	O	O
PERMIT <u>TRANSFER (NPDES)</u> OR <u>CLOSEOUT (NPDES &amp; 404)</u>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Permit conditions are met prior to final inspection	A	P	O	P	O	O	O	C	C
Long term monitoring is required (404)	A	P	O	P	O	O	O	O	O

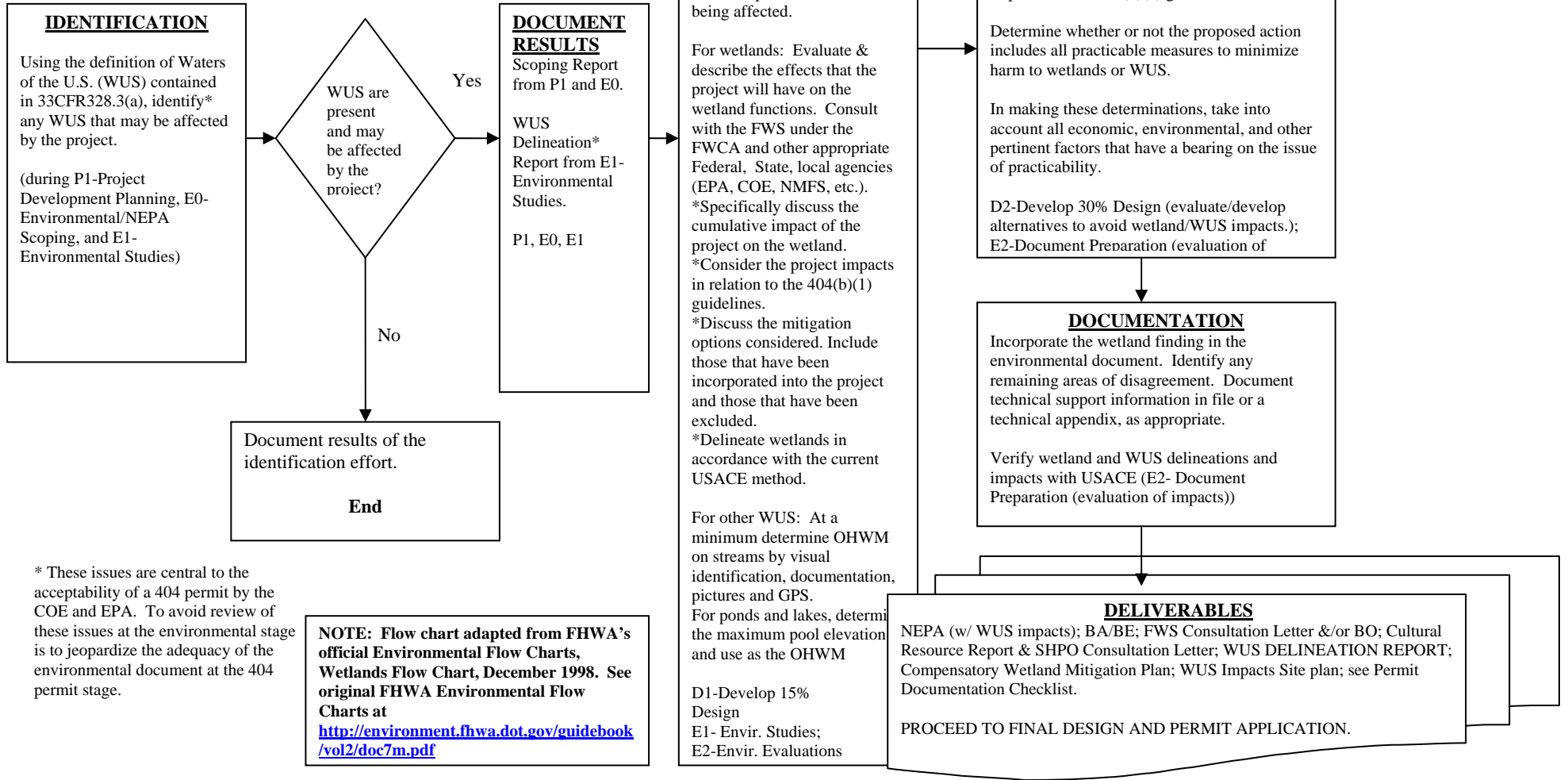
# Appendices

The references are for information only and are intended to supplement the permitting process.

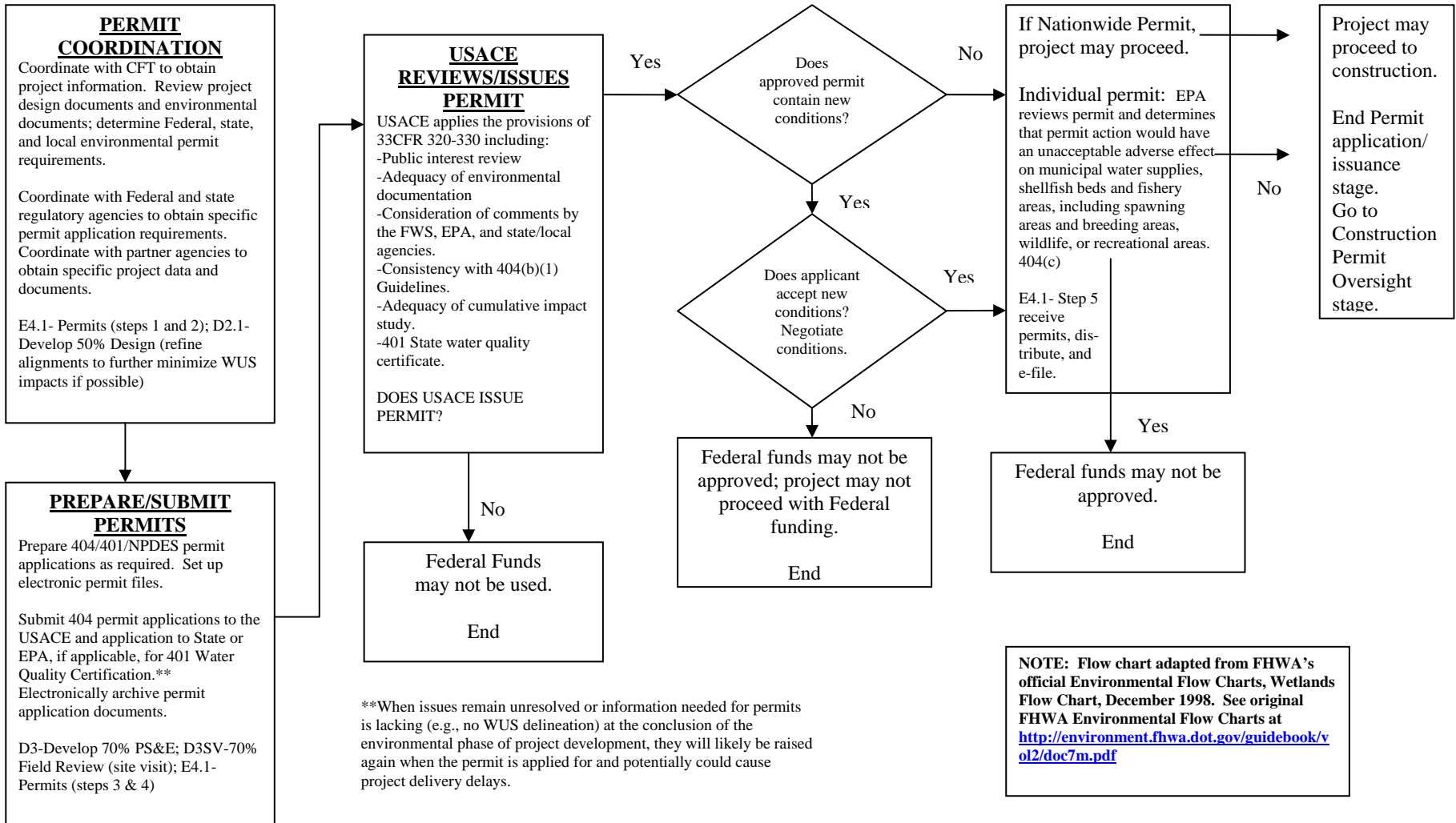
1. Clean Water Act Flow Chart .....	V2-V4
2. Key Definitions.....	V5
3. Milestone Activity Deliverables.....	V6-V7
4. Example Project Schedule.....	V8-V9
5. Permit Documentation Checklist.....	V9

**CLEAN WATER ACT Sections 404 & 401 (CWA) PERMITTING PROCESS**

**Page 1 of 3: Delineation and Impacts Phase- Delineation, Evaluation, Avoidance,**

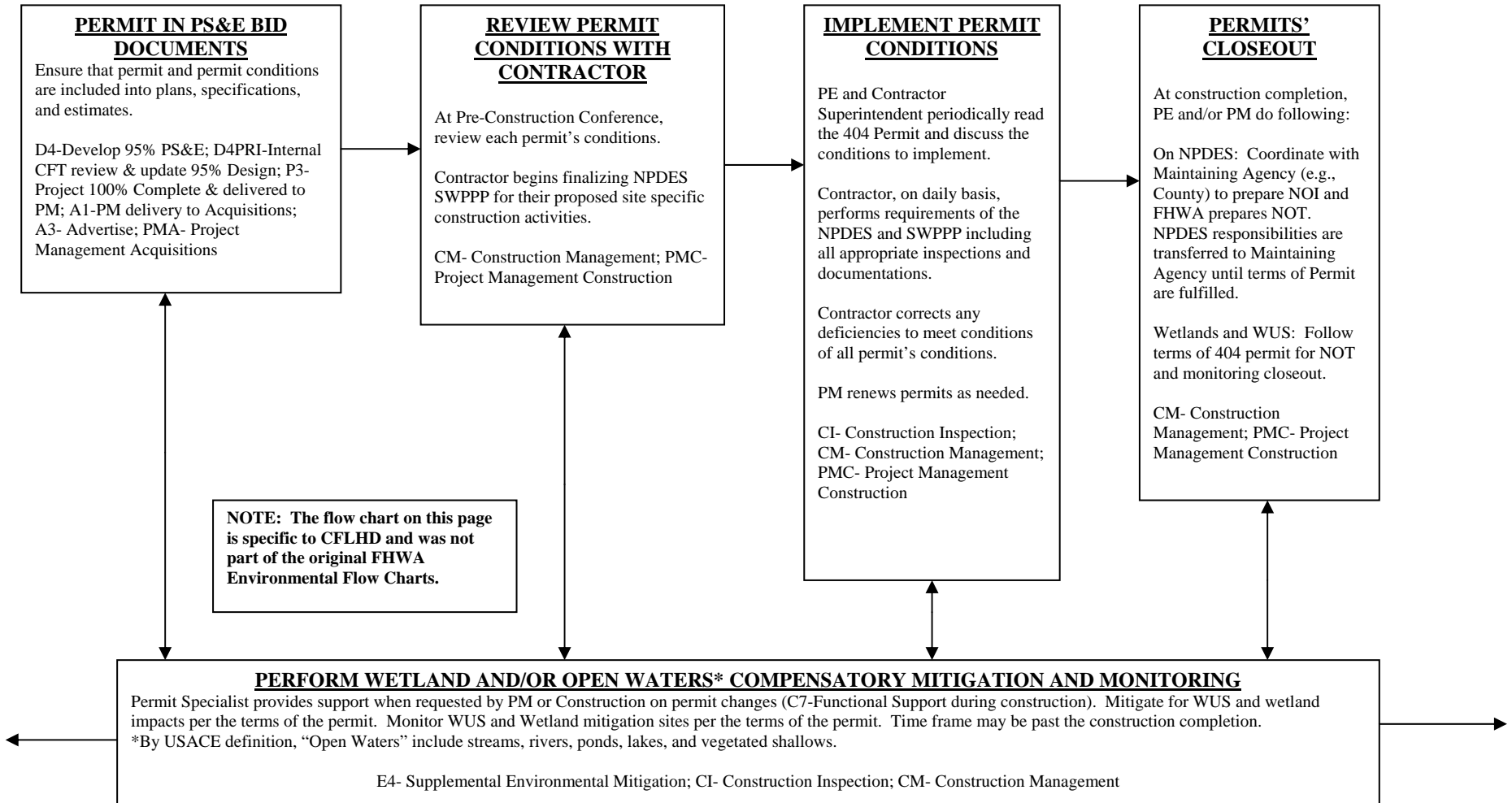


**CWA PERMITTING PROCESS; Page 2 of 3: Permit Application/Issuance Phase- Coordination, Prepare/Submit, USACE Review/Issue**



**CWA PERMITTING PROCESS**

Page 3 of 3: Construction Phase- PS&E, Review w/ Contractor, Implement Conditions and Mitigation, Monitor Mitigation, Closeout



## SOME KEY DEFINITIONS:

### **WATERS OF THE UNITED STATES (WUS):**

- See definition at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=b2b8ddfff42d38d0a255a50edf5b9985&rgn=div5&view=text&node=33:3.0.1.1.35&idno=33>
- One key component of the definition for CFLHD projects is: WUS means “(5) Tributaries of waters identified in paragraphs (a) (1) through (4) of this section;”

### **WETLANDS:**

- See definition at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=b2b8ddfff42d38d0a255a50edf5b9985&rgn=div5&view=text&node=33:3.0.1.1.35&idno=33>
- Wetlands means “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.”

### **ORDINARY HIGH WATER MARK:**

- See definition at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=b2b8ddfff42d38d0a255a50edf5b9985&rgn=div5&view=text&node=33:3.0.1.1.35&idno=33>
- OHWM means that line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means....

### **404(B)(1) GUIDELINES:**

- See [http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=3bfc24294f6d3bc7c75b1bb242241372&tpl=/ecfrbrowse/Title40/40cfr230\\_main\\_02.tpl](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=3bfc24294f6d3bc7c75b1bb242241372&tpl=/ecfrbrowse/Title40/40cfr230_main_02.tpl)
- The crux of these guidelines fall into the following 3 step process: 1) Evaluate alternatives to impacting Wetlands or WUS; 2) If impacts to Wetlands or WUS are unavoidable, then evaluate ways to minimize impacts; 3) Provide for Compensatory Mitigation for unavoidable impacts to wetlands and WUS.

### **COMPENSATORY MITIGATION:**

- See [http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=3bfc24294f6d3bc7c75b1bb242241372&tpl=/ecfrbrowse/Title40/40cfr230\\_main\\_02.tpl](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=3bfc24294f6d3bc7c75b1bb242241372&tpl=/ecfrbrowse/Title40/40cfr230_main_02.tpl)
- Compensatory mitigation means “the restoration (re-establishment or rehabilitation), establishment (creation), enhancement, and/or in certain circumstances preservation of aquatic resource for the purposes of offsetting unavoidable adverse impacts which remain **after all appropriate and practicable avoidance and minimization has been achieved.**” (bold added)



# **MILESTONE ACTIVITIES DELIVERABLES**

## **P1- Project Development Planning**

Deliverable is **Scoping Report** (for NPS, FH, and Refuge Roads projects) that answers the following questions related to permits:

### COE Section 404 Permit:

- Will the project require discharging fill into: wetlands?, a perennial stream?, an intermittent or ephemeral stream?, a pond or lake?
- Will any fill be placed below the OHWM?
- Will there be any channelization or channel changes required?
- Is a Nationwide or Individual Permit required?
- Take photos of any potential impact areas of wetlands and streams. Identify photo locations on a site map. \*Photos are extremely helpful in assessing permit needs, in completing applications and providing the Corps useful information for their decision document. In some Corps Districts, photos are required as part of the documentation/application.

### NPDES Permit:

- Will 1 to 5 or more acres of land be disturbed?
- Is the project on Tribal lands?
- Is the project subject to any County or Local sediment/erosion management plan?
- Is the project subject to a State or Basin sediment/erosion management plan?
- Is the [Park (NPS), County (RRP), Cooperator (FH)] willing to assume responsibility for the NPDES Permit upon completion of construction?

### Other Permits/Authorizations

- A number of questions associated with various other potential permits required (e.g., staging area, dewatering, air quality, stream alteration, encroachment, etc.)

### Environment:

- Wetlands- Is a wetland delineation survey required?
- Are there any rivers in the project area that are designated a State or National Wild and Scenic River?
- Are there any Water Quality issues that may require a monitoring plan?
- Are there any Storm Water Management devices required? If so, what are the design criteria?
- Are there any wildlife or aquatic organism crossing/passage issues?

### Hydrology/Hydraulics:

- Photograph and describe location and type of know drainage problems
- Describe location, size, shape...of all drainage structures to be retained. Describe evidence of scour/erosion at inlets/outlets, deposition of sediment or debris at inlets/outlets, abrasion or corrosion of pipe, presence of riprap aprons at inlets/outlets....Photograph inlets, outlets, and other cited problems
- Photograph and describe any channel migration concerns or anticipated stabilization work (photograph channel looking up and downstream)
- Does the project potentially impact a floodplain regulated by FEMA? Is there potential for the floodplain to be encroached upon by roadway fill?
- Is there potential for embankment and/or retaining walls being located along streams/channels or floodplains?
- Are any stream and/or floodplain restoration efforts anticipated?
- Are any low-water crossings anticipated?

## **E0- ENVIRONMENTAL SCOPING**

Deliverable related to permits is: Trip Reports identifying the issues and concerns on the project from meetings and field reviews with SEE team members and Resource agencies and public meeting with public. Should answer the following questions:

- What permits are likely to be needed?
- Are there potential waters of the U.S.?
- Does a delineation study/survey need to be conducted?

## **E1- ENVIRONMENTAL COMPLIANCE STUDIES and D1- 15% DESIGN**

Deliverable related to permits is:

For FHP and RRP projects- Report on delineated waters of the U.S.

For PRP projects- Preliminary impact analysis on alternatives. Update of Environmental Screening Form (ESF) to describe effects to: water quality/quantity, streamflow characteristics, marine or estuarine resources, floodplains or wetlands, riparian vegetation, and unique, essential or important fish or fish habitat.

## **E2- DOCUMENT PREPARATION and D2- DEVELOP 30% DESIGN**

Deliverables related to permits are:

For FHP and RRP projects- Alternatives developed/evaluated to avoid wetland/WUS impacts; alternatives to minimize impacts to wetlands/WUS; draft environmental document must identify wetlands and WUS and any unavoidable impacts; release environmental document for public review; finalize environmental document and decision document with Environmental Commitments Summary (ECS).

For PRP projects- Prepare draft Wetland Statement of Findings (SOF) including proposed mitigation measures; identify what permits required; release EA and draft SOF for public review; and prepare initial Environmental Commitments Summary (ECS).

## **D3- DEVELOP 70% PS&E and E4.1- PERMIT DEVELOPMENT**

Deliverables related to permits are:

For all projects E4.1-PERMIT DEVELOPMENT tasks include:

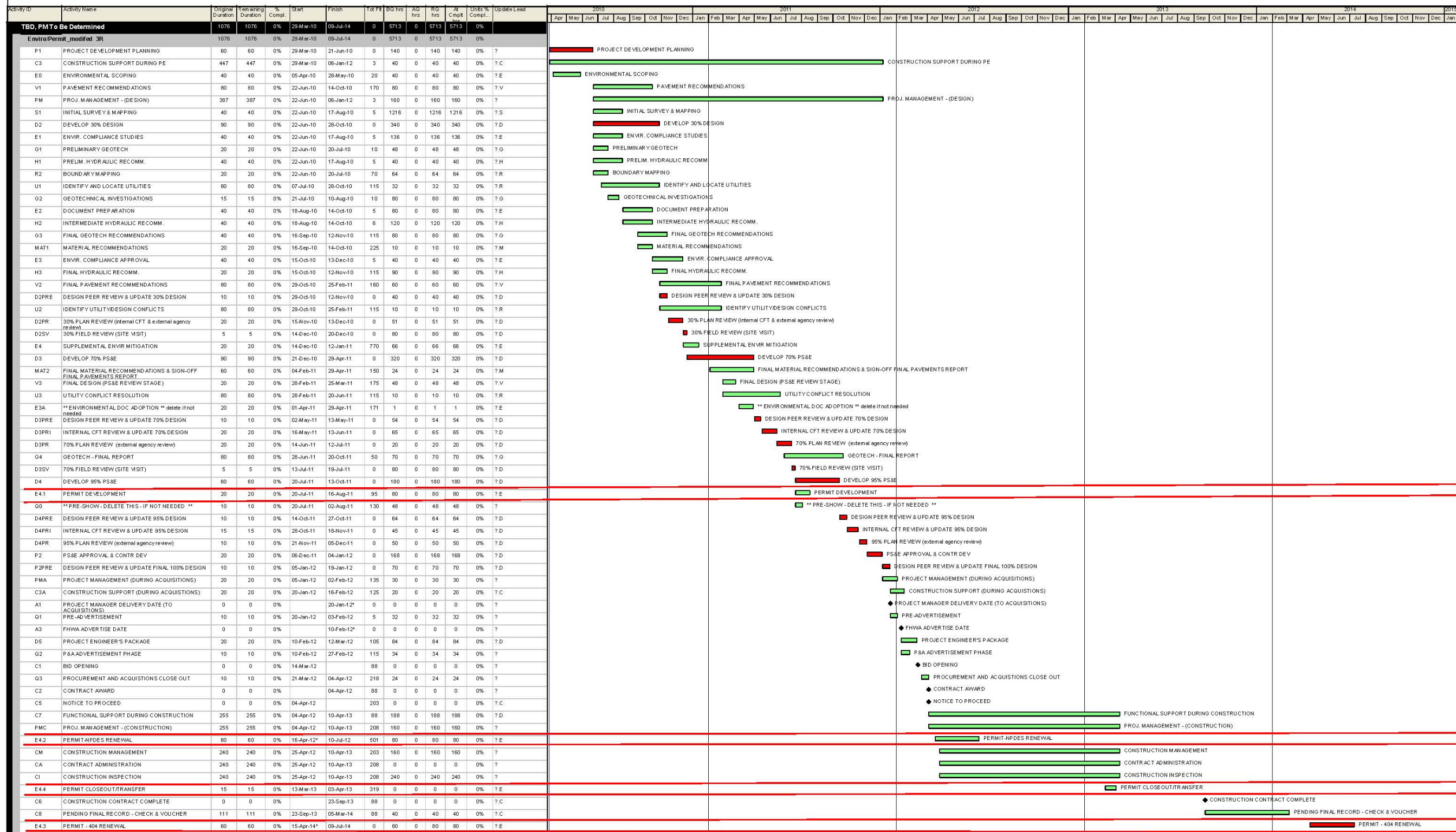
1. Coordinate with CFT to obtain project information. Review project design documents and environmental documents; determine Federal, state, and local environmental requirements. (beginning at 50% design stage)
2. Coordinate with Federal and state regulatory agencies to obtain specific permit application requirements. Coordinate with partner agencies to obtain specific project data and documents.
3. Prepare 404/401/NPDES permit applications as required. Set up electronic permit files. (beginning at approximately 70% design stage)
4. Submit applications to the regulatory agencies. Electronically archive permit application documents.
5. Receive permits, distribute, and e-file. (preferred at 95% design stage, but no later than P&P delivery date)

For FHP, RRP, and PRP projects- See Permit Documentation Checklist for various documents needed by Permit Specialist.

For PRP projects - Final Wetlands Statement of Findings (SOF), Application for Permits, and Complete Environmental Commitments Summary.

Enviro/Permit\_modified 3R

12-Aug-10 15:09



## Permit Documentation Checklist

**Project:** \_\_\_\_\_ **Project Manager:** \_\_\_\_\_

**Designer or A/E:** \_\_\_\_\_ **Environment Lead :** \_\_\_\_\_

Document	Supporting Documents Needed	Does Environment Have?	Date of Document	Notes
NEPA *	CE, EA & FONSI, or EIS & ROD **			
	Re-evaluation of NEPA**			
	BA/BE			
	FWS Consultation Letter and/or BO			
	Cultural Resource Report			
	SHPO Consultation Letter			
Delineation of Waters of the U.S (WUS). *	Delineation Report			WUS = streams, open waters & wetlands
	Any JD letters from CORP			
Compensatory Wetland Mitigation Plan *				
WUS Impacts Site plan <sup>1</sup> **				
Summary description of the project <sup>2</sup> **				
Standards, details, X-sections, layouts, and quantity summary sheets for culverts and riprap in WUS**				
Erosion and sediment control (E&SC) plans <sup>3</sup> (E sheets from plans) **				
Detail sheets and quantity summary sheets for all E&SC materials (silt fence, sediment logs, etc...) **				
Bridge plans and cross-sections <sup>4</sup> **				
Final SCR Sections 105, 107, 157, 158, 203 ***				

1. Site plan should show (see attached examples):
  - construction details and locations of delineated waters
  - locations and amounts of permanent and temporary fills to Waters of the U.S. (WUS)
  - Fills to WUS in areas (sf) for wetlands and volumes (cy) below OHWM for channels, lakes
2. Summary should include:
  - Project location
  - Length of roadway & Nature of work (3R, 4R)
  - Details on type of work triggering need for permit (i.e. number of culverts repaired/replaced, bridge construction, etc...)
3. Plans should include locations of all planned storm water discharge points, and BMPs utilized.
4. Bridge sheets should include (see attached examples):
  - OHWM (Q2 elevation may be used but label as OHWM) on both the elevation and cross-section views
  - Areas and volumes of permanent and temporary fill below the OHWM

\*Needed for 404/401    \*\*Needed for both SWPPP and 404/401    \*\*\*Needed for SWPPP