This training module has been set up in response to the answers received from the Divisions to a recent questionnaire as well as questions that my Group have been addressing as projects get distributed to the Divisions.
What are those projects? In number they are the majority of STIP. 439 of the total 669 STIP projects have been initially assigned to the Divisions to be managed. However, the remaining 230 projects constitute over 80% of the STIP budget. In this Treemap, the size of the rectangle is proportional to the project cost. Division managed projects in yellow, centrally managed projects in purple.
Every project, regardless of size or funding source needs to be analyzed for its environmental impacts. This analysis sees the need and cost of the project weighed against the project’s impacts to the environment (both human and natural). The process through which a project is analyzed is government regulated and outlined in an environmental policy act – NEPA at the national level and SEPA or NC EPA at the state level.
This generalized project delivery flowchart shows the project development process with the major questions/tasks/decision points that need to be addressed for the environmental and permitting aspects of a project—note this is not a comprehensive project delivery flowchart. There are a couple of minor elements excluded like Design and ROW acquisition. Also notice though that there are a few steps before you determine the appropriate level or type of environmental documentation.
The scope of work suggested here covers these four decision points by identifying early your potential environmental impacts. This will lead to decisions on what (if any) other stakeholders need to be engaged, and will also help you determine the correct (i.e. legally sufficient) environmental documentation (or document) to pursue. Early engagement with USACE with this information will also ensure smooth permitting.
Environmental Policy Act Sequence

1. Identify the purpose and need for your project.
2. Collaborate with national, state and local partners.
3. Evaluate the different alternatives by comparing the various resources impacts.
4. Coordinate with regulatory agencies to determine and satisfy all permit requirements.
5. Involve the public as appropriate for scope and nature of the project.
6. Construct the project.

Abbreviations
EPAct = Environmental Policy Act
CE = Categorical Exclusion
EA = Environmental Assessment
EIS = Environmental Impact Statement
MOSDC = Minimum Online Determination Checklist
FONSI = Finding of No Significant Impact

[Diagram showing a flowchart with steps and decisions related to EPAct.]
Because projects vary in scope and the project development process varies from Division to Division, the PCN makes a familiar tool on which to base preliminary environmental analysis particularly for projects that may be of larger scale than some Divisions have worked with in the past.
We have developed a PCN scoping template to help guide the process of getting a consultant under contract. The tasks are aligned to provide the information needed for the PCN and also to get the information needed to complete PJD. This scoping template is a guide, adapted from one that we would use to complete the permit application.
Task 1.1 Includes the Information Gathered for Human Environment Investigations

1. Search for Known Natural Resources
2. Survey for historic and prehistoric sites
3. Ensure that structures within the study area are R1W + 1/2, R2O
4. Identify any areas of subsurface ground or uplands, within the study area, immediately adjacent to the R1W + 1/2.
5. Identify any potential archaeological resources

Task 1.2 Includes the Information Gathered for Methods of Investigation

12. Determine if the project is in a FEMA-designated floodplain

Deliverables:
- PCN cover letter explaining impacted and human resource information summarized
- PCP summary
- Jurisdictional Determination package — this may vary by project
- Proprietary computer input project, demographic area and study area of project
- Project contacts
- Natural Resource Memo
- Map with PCP certification in pdf format
- QA/QC form with signatures

Includes a map showing resource locations
Cost estimate spreadsheet that approximates the appearance of the sheet you will populate in the “kitchen sink” spreadsheet that will be explained in the next presentation. A estimate of man hours for each task will lead to an estimated total cost. You would fill this out with the hours it would take, by the appropriate Division personnel, to complete each task. We’ve had some questions as to what are reasonable time frames for some tasks. In general, to complete a cost estimate, we start with a project study area. We then have several rules of thumb that we use to develop manhour estimates that can be adjusted for individual projects. In general we allow 4 hrs for landowner letters; for NR and T&E fieldwork we estimate between 9 acres/day (vegetated) and 25 acres/day (maintained/disturbed). Extra time and or travel may be needed depending on T&E survey windows. WEX and WET file creation can vary from 4hrs for a bridge to 3 days for a large project with multiple resources. Similarly PJD package will depend on the size of the project and the extent of jurisdictional resources – 1 day for a bridge and 3+ days for complex projects. If an NRTR is required times could range from a day to not more than a week.
For projects that involve areas delineated as jurisdictional WOTUS, a PLS must seal the wetland delineation. Consultants are used to this part of the wetland mapping task but you need account for it in your cost estimates. There are a few work arounds – the main one being if Division personnel survey wetland flags but this may, or may not be practical given the early timeline of this data gathering.
Once the preliminary environmental analysis is complete, a meeting with the USACE is recommended.
At this meeting, the appropriate level of environmental documentation and permit type can be better determined. Any additional environmental coordination can also be determined.
Environmental Analysis Work Scheduling

• Is the project entirely state funded? If so, then proceed with the minimum criteria determination checklist (MCDC) or SEPA Document.

• Does the project have any federal funds? If so, then proceed with PCE, CE, or the appropriate NEPA document.

• Will the project be permitted under a NW, GP, or IP? Regardless of state or federal funds, there will need to be, at a minimum, a review at the MCDC level.
Environmental Analysis Work Scheduling

- When project design is completed at the preliminary level, the agencies can visit the site for verification (if needed).

- Provide Natural and Human Resource information either through a Natural Resource memo, Arch/Historic Forms, SEPA Doc., NEPA Doc., or MCDC.
Links


Questions?

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