



**Oregon  
Department  
of Transportation**

# **REGION ENVIRONMENTAL COORDINATOR MANUAL**

**Delivery & Operations Division | Engineering &  
Technical Services Branch**

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## **REGION ENVIRONMENTAL COORDINATOR MANUAL**

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### **Oregon Department of Transportation**

Statewide Project Delivery Branch – Engineering & Technical Services Branch

Environmental Section

4040 Fairview Industrial Dr. SE

Salem, OR 97302

<https://www.oregon.gov/odot/GeoEnvironmental/Pages/index.aspx>

# REGION ENVIRONMENTAL COORDINATOR MANUAL

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# Introduction

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This manual provides guidance for Region Environmental Coordinator (REC) roles and responsibilities. The RECs are typically the primary environmental contact<sup>1</sup> and liaison between the planning group, project development teams (PDT), maintenance operations, Federal Highway Administration (FHWA) representatives, environmental discipline specialists, and environmental interested parties to implement projects consistent with the mission and goals of the Oregon Department of Transportation (ODOT).

## Agency Mission Statement

We provide a safe and reliable multimodal transportation system that connects people and helps Oregon's communities and economy thrive. ODOT's environmental protection disciplines aim to preserve and enhance the natural and historic elements that make Oregon unique.

## General REC Roles and Responsibilities

During project development, the REC monitors the progress of required environmental compliance documentation through coordination with the various environmental discipline specialists. The REC communicates status of environmental surveys, permits, clearances, approvals, and other information as needed to project team partners and members of the environmental team. The REC monitors projects for changes in scope, schedule, compliance, and other project details. Changes are communicated and coordinated by the REC with the appropriate environmental discipline specialists and agencies, in some cases. The REC provides input to the project team about potential consequences of plan changes.

Typical responsibilities of RECs to ensure successful delivery of ODOT actions include the following:

- Assist with pre-project planning and Statewide Transportation Improvement Plan (STIP) scoping
- Review project deliverables for consistency and track documentation of Quality Assurance (QA)/Quality Control (QC)
- Assist with consultant procurement by reviewing scopes of work and providing independent estimates
- Participate in planning studies
- Assist in the development of a project's purpose and need, area of potential impact (API) and area of potential effect (APE), project alternative selection, avoidance and

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<sup>1</sup> For projects requiring an Environmental Assessment or Environmental Impact Statement, the primary ODOT environmental contact is the Environmental Project Manager.

minimization measures, and document National Environmental Policy Act (NEPA) compliance

- Represent the environmental team on multidisciplinary project delivery teams during all phases of project development (e.g., scoping, project delivery, construction, and maintenance)
- Monitor the progress of environmental compliance documents through regular coordination with various environmental discipline specialists
- Regularly communicate the status of environmental permits, surveys, clearances, and approvals with project team members and the environmental team
- Assist with the development of construction specifications
- Review design plans and specifications at various milestones to ensure environmental issues and concerns are addressed and environmental commitments are incorporated as the project moves through project development
- Verify proper implementation of environmental protections and commitments during construction through periodic construction monitoring
- Prepare NEPA reevaluations for changes in project scope, limits, or effects that arise after NEPA compliance has been finalized
- Assist maintenance and district staff with project delivery and environmental clearances
- Assist in the development of statewide initiatives
- Coordinate with the FHWA as directed by the Region Environmental Manager for project status reporting and discussion of complex projects
- Implement projects consistent with federal and state environmental laws and regulations
- Assist maintenance and operations staff with responses to emergencies
- Review and provide oversight on consultant-led projects

## ODOT Transportation System Project Lifecycle

This manual follows the ODOT Transportation System Project Lifecycle. At ODOT, the system lifecycle begins with analysis and planning of the existing system to identify potential projects and continues through maintenance and operations.

The process has four stages (see Figure 1):

1. Program Development
2. Project Development
3. Construction Management
4. Maintenance and Operations

RECs have an integral role in each stage of the process.

**TRANSPORTATION SYSTEM PROJECT LIFECYCLE**

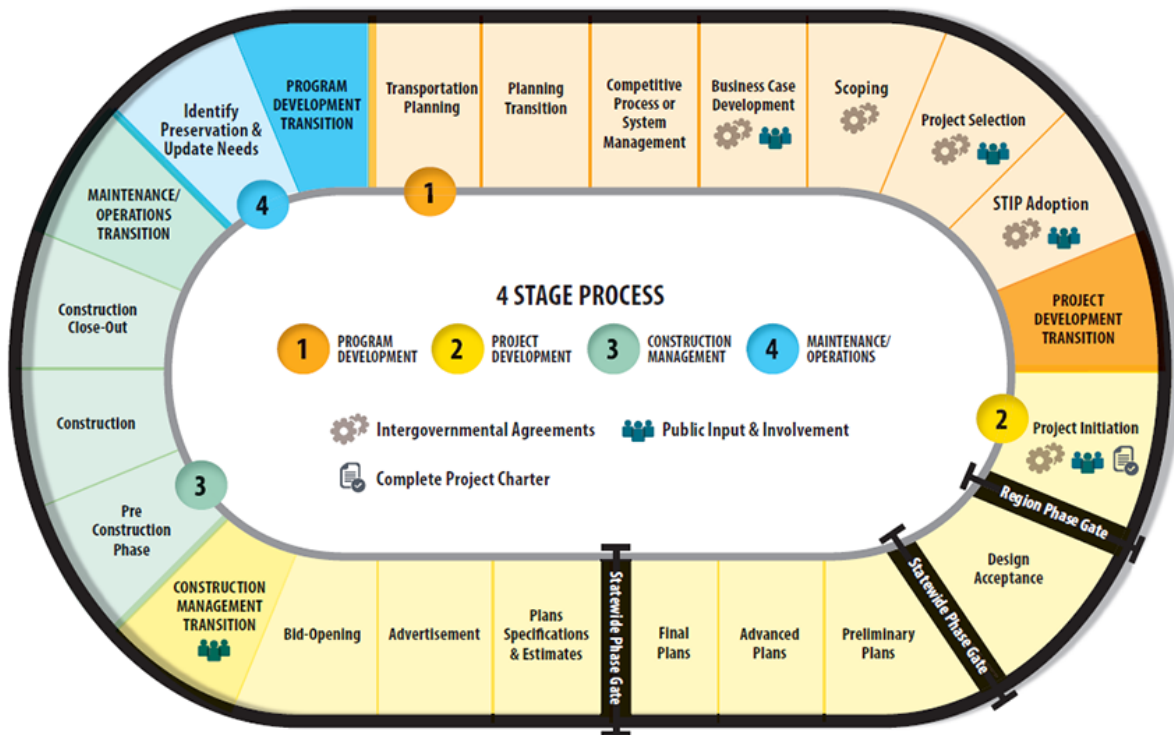


Figure 1 Transportation System Project Lifecycle

**Chapter 1 - Program Development**

**1.1 Planning**

**Coordinate with planners on studies and consistency with Local Transportation System Plans (TSPs) & Interchange Area Management Plans (IAMPs)**

Planning studies (e.g., facility plans, refinement plans, freight plans, corridor plans, Planning and Environmental Linkage strategies) are sometimes completed by ODOT and/or local governments to identify potential projects to incorporate into transportation plans. RECs advise planners and planning studies to ensure consideration of potential environmental impacts and mitigation and gain efficiencies in project delivery during the NEPA phase (i.e., Planning Environmental Linkage studies).

Coordinate with planners to ensure project scopes are included in the TSPs and IAMPs. Advise the team of the need to develop the project consistent with the plans, or the need to update the plans to be consistent with the project. Studies are often completed to identify projects to incorporate into planning plans; therefore, this may or may not be applicable to your project.

For additional information, review the [TSP Guidelines](#) and the [IAMP Guidelines](#).

#### **Define sensitive resources that could be impacted**

Review the general planning study area for existing resources. The ODOT [Project Vicinity Mapping Application](#) has several data layers that provide information on environmental resources (e.g., critical habitat, historic sites, Section 6(f) resources, wetlands). Consider potential construction methods and how they could impact the existing resources.

#### **Provide Initial assessment of Impacts on alternatives analysis**

Provide input to the planning team on environmental resources which may be present within the study area and how different alternatives could have different impacts to those resources.

Notify the planning team of any resource impacts that may not be able to be permitted. For example, a project would not be permitted if one of the alternatives would impact a Section 4(f) resource and there are reasonable measures to minimize harm or there are feasible and prudent avoidance alternatives that (as defined in [23 CFR 774.17](#)) would avoid adverse impacts.

#### **Determine NEPA class of action**

After a preliminary review of existing resources, potential construction impacts, and other project activities has been conducted, RECs make a preliminary determination regarding the NEPA class of action. [23 CFR 771.115](#) lists the three classes of action: Class I: Environmental Impact Statement; Class II: Categorical Exclusion or Programmatic Categorical Exclusion; Class III: Environmental Assessment. Review the ODOT [NEPA Manual](#) for additional guidance.

#### **Planning and Environment Linkages**

Planning and Environment Linkages (PEL) represent a collaborative and integrated approach to transportation decision-making that considers environmental, community, and economic goals early in the transportation planning process. PELs are applicable to a wide variety of contexts including programmatic and project-level planning. At the project level it can be used to inform and streamline environmental review by transitioning information, analysis, and products developed during a PEL study into a subsequent NEPA process.

The process can streamline environmental review by reducing or eliminating duplication of work in the planning and NEPA processes and improve information sharing and early consultation among state, federal, and resource agencies. RECs coordinate with and advise planners on potential environmental impacts associated with a project.

ODOT's [PEL webpage](#) provides additional guidance as well as the PEL Questionnaire, which can be used as a framework to develop and document a PEL strategy if the project team determines to pursue PEL.

## 1.2 Scoping

### Coordinate with scoping team to obtain details on the proposed project

Obtain an understanding of the project's potential API and APE to determine if environmental resources may be present and whether or not they could be impacted by the project. Consider potential construction staging and access as part of the API and APE. Important information to obtain during the scoping process includes details such as if the project will have a federal nexus, the anticipated right-of-way (ROW) and access control impacts, contracting approach, and construction methods.

### Review scoping notes

Verify scoping assumptions are accurately captured in the environmental scoping document by reviewing scoping notes from each discipline, including disciplines that may impact environmental resources.

### High level assessment of potential impacts

During the scoping process, the REC (in coordination with discipline specialists, if necessary) identifies potential impacts to the following resources:

- Aesthetics / visual resources (e.g., State or Federal Scenic Highway or byway, State Scenic Waterway or Wild and Scenic River, State or Federal Scenic Area or Corridor, etc.)
- Air quality
- Archaeological and historic resources
- Biological resources (e.g., fish, birds, wildlife, plants / habitat)
- Coastal Zones
- Economic and social impact considerations
- Energy resources
- Environmental justice considerations
- Floodplains and Floodways
- Hazardous materials and sites
- Land use compatibility (statewide planning goals)
- Noise study / mitigation



- Public parks / recreation resources
- Prime or Unique Farmlands
- Right-of-way needs (permanent and temporary)
- Section 4(f) evaluation and documentation
- Section 6(f) identification and coordination with Oregon Parks and Recreation<sup>2</sup>
- Tribal coordination and resources (i.e., Traditional Cultural Properties [TCPs], historic properties of religious and cultural significance to Indian Tribes [HPRCSITs], etc.)
- Traffic analysis and study report
- Wetlands and waters of the state / US
- Water resources / water quality / stormwater
- Navigability under bridges<sup>3</sup>

Additional guidance regarding these resources is provided in the [Environmental Prospectus Guide](#).

#### **Determine environmental studies and permits that may be required**

Based on an initial review of environmental resources, consider which studies and permits/approvals will be required. Coordinate with environmental discipline specialists as needed to obtain a better understanding of resources and determine if any unique circumstances may apply to the project.

#### **Complete cost estimating**

During the scoping phase, the REC needs to complete cost estimating to establish the budget needed to complete all environmental work and obtain all environmental permits for a project. The REC should consider the cost of intermediate studies and permitting efforts (e.g., permits for geotechnical explorations) and include potential mitigation items in the budget, such as stream/wetland mitigation, the need for archaeological monitoring, adverse impacts to historic resources, and Migratory Bird Treaty Act (MBTA) monitoring. The REC can help to determine the Active Channel Width for culvert and bridge replacement projects to provide a general cost estimate based on the width of the opening needed.

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<sup>2</sup> ODOT has identified a single point of contact for coordination with Oregon Parks and Recreation. Contact the NEPA Program Coordinator for Section 6(f) needs.

<sup>3</sup> The REC would need to determine if the bridge is under U.S. Coast Guard jurisdiction, Oregon State Marine Board jurisdiction, or both.

#### Identify anticipated schedule for all permits and NEPA clearances

Determine which permits/approvals are required for the project, how long each one takes to obtain, and consider how the permits and NEPA clearances would fit into the project milestone dates. Review overall schedule and flag potential abnormal permitting timelines (e.g., U.S. Coast Guard Bridge Permit). Identify potential ROW schedule delays/timing based on the anticipated NEPA class of action. Include additional time for QC review and documentation of deliverables.

#### Determine preliminary NEPA Class of Action

The ODOT NEPA Manual [Section 411 \(Scoping\)](#) provides guidance on project scoping, which is when the NEPA class of action is estimated. [23 CFR 771.115](#) lists the three classes of action (Class I: Environmental Impact Statement; Class II: Categorical Exclusion or Programmatic Categorical Exclusion; Class III: Environmental Assessment).

## Chapter 2 - Project Development Phases

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Throughout the various phases of project development, the REC coordinates with the PDT and environmental discipline specialists to ensure information, needs, and risks are effectively communicated.

RECs provide environmental discipline specialists with project information and study needs, including the project description, API and APE, vicinity map, and project schedule. RECs obtain a full understanding of environmental resources and critical permitting issues. As the project progresses, RECs continue coordination with discipline specialists to track progress of required studies and permits/approvals. Updates to schedule and design changes are provided to discipline specialists if there is potential to affect environmental resources (e.g., if the API changes and new environmental studies are needed).

Throughout the life of a project, coordination with FHWA occurs at several stages, including the NEPA class of action confirmation, pre-Design Acceptance Package (DAP), regional coordination meetings, Section 4(f) impacts, and others. FHWA owns the NEPA process and RECs should coordinate with FHWA to provide updates and ensure the project is on track to obtain the proper clearances according to the schedule.

RECs provide the PDT with an understanding of the environmental issues that the project could encounter or that may affect the design. RECs participate in regular PDT meetings to provide updates on environmental studies, permit progress, and any changes that arise which could create environmental impacts or affect the budget or schedule. The REC communicates any schedule issues or previously unknown environmental resource issues to PDT as they become known and provides information necessary to populate the Project Risk Register.

REC deliverables during project development include the following:

- API(s) and APE as obtained from and in coordination with PDT and discipline specialists
- Right-of-Entry (ROE) Request for environmental studies\*
- Environmental Prospectus and Project Vicinity Map
- Programmatic Categorical Exclusion (PCE) Determination\*
- Design Acceptance Package (DAP) Environmental Narrative
- No Ground Disturbance (NGD) PCE\*
- Coordination with engineers for development of environmental related Special Provisions sections (e.g., Section 00280, 00290, 1030, 1040, 1091)
- Bid item list for environmental features and cost estimate for environmental construction support\*
- PCE Approval or Categorical Exclusion (CE) Closeout
- Environmental Statement of Technical Review (E-STR)

\* as applicable

Each of the deliverables are described in the sections below, including when they need to be completed and guidance on how to complete them.

For additional guidance on project development and delivery, review the [Phase Gate Delivery Manual](#).

## 2.1 Project Initiation

### Work with PDT to establish the API and APE

During project initiation, RECs coordinate with the PDT to assist with the development of the API and APE. Verify that access, staging areas, disposal sites, and material sites are included as applicable. The PDT should provide the API with input from the REC (i.e., the REC should not create the API). The API should be developed in collaboration with the environmental discipline specialists. Note that the API can differ depending on the resource (e.g., the traffic API may be different from the noise API).

### Establish schedule expectations

Confirm the schedule for environmental tasks for the project. RECs should anticipate when studies are to be completed, when applications need to be submitted, when permits need to be obtained, and how the NEPA clearance fits into the overall project schedule. RECs identify any risks to the assumptions used to establish the schedule (e.g., not meeting Federal Aid Highway Program [FAHP] design standards) and include intermediate permitting efforts (e.g., geotechnical explorations) if applicable.

#### **Identify Right-of-Entry (ROE) needs for environmental discipline specialists (after API and APE are established)**

Once the API and APE have been established, the REC coordinates with the environmental discipline specialists to understand their anticipated work to be completed in the field and to identify all areas which need to be accessed to complete the field work. RECs coordinate with the ROW representative on the PDT and provide the ROE needs for all environmental discipline specialists.

#### **Complete Environmental Prospectus**

RECs need to complete an Environmental Prospectus for the project using the designated form found on the [NEPA webpage](#) under the “Forms and Templates” tab. The Environmental Prospectus is both a checklist and narrative form that serves as a tool for conducting a preliminary assessment of environmental resources within or adjacent to the project area. Once completed, a QC review of the prospectus is completed using the QC Peer Review Checklist and Comment Log. Although not required until the PCE Determination, it is recommended to complete the Project Vicinity Map with the Environmental Prospectus as an aid to the discipline specialists.

Additional guidance on completing the prospectus is provided in the [Guidance for the ODOT Environmental Prospectus](#).

#### **Complete NEPA PCE Determination and Project Vicinity Map (if able to)**

If applicable, RECs complete the PCE Determination using the designated form (see NEPA Manual [Section 423: Programmatic Categorical Exclusions](#)) and create a Project Vicinity Map using the [Project Vicinity Mapping Application](#). Complete the PCE Determination after project initiation but no later than DAP Complete.

Visit the ODOT [NEPA webpage](#) for additional information. The PCE Determination Form is available under the “Forms and Templates” tab.

#### **Upload files to ProjectWise folder**

After the PCE Determination has been completed (if applicable), the REC uploads environmental documents to the project environmental folder in ProjectWise and creates the NEPA set in the CE/PCE/NGD projects folder in the environmental discipline ProjectWise site, as outlined in the [NEPA Manual](#).

For step-by-step instructions on creating ProjectWise sets, uploading and naming documents, and adding to previously created sets, see [Section 427 Managing Documentation](#).

#### **Start QC process for environmental documentation**

RECs are responsible for tracking and verifying that QC has been completed for each environmental deliverable associated with a PCE or CE project (see the ODOT NEPA Manual [Section 453: PCE/CE Quality Assurance & Control](#)). As each environmental deliverable is completed by a discipline

specialist and/or environmental consultant, QC documentation needs to be completed and stored in the project's ProjectWise folder.

For environmental discipline deliverables, the REC is responsible for tracking and verifying that QC has been done for each identified environmental discipline deliverable, as relevant to each PCE and CE project. The checklist created for this effort is the responsibility of the REC assigned to any given PCE or CE project. This statewide environmental discipline QC tracking and verification checklist for PCEs and CEs replaces the previous individual region "environmental statement of technical review" (or STR) that region environmental managers required the REC to compile and/or sign prior to certain project development milestones. This QC checklist is called the Environmental STR, or "E-STR QC Checklist") and is posted on the ODOT [NEPA Program website](#) under Forms and Templates. The REC who prepares the PCE or CE documentation and compiles all the supporting documents will verify that the technical discipline preparers and/or approvers have performed their own discipline QC process and signed/dated their discipline QC documents; the REC preparer will then complete, sign, and date the applicable E-STR QC Checklist for review by the Region Environmental Manager prior to their approvals of CEs and PCEs.

## 2.2 DAP Development through DAP Complete

### **Incorporate avoidance and impact minimization measures**

RECs work with the PDT to incorporate avoidance and impact minimization measures into the design. Avoidance measures may include adding no-work zones to plans, and some common minimization measures may include erosion control measures or various on-site monitoring. If on-site mitigation is required (e.g., roadside development), the REC works with the PDT to provide the requirements and documentation of environmental commitments.

### **Track progress of environmental studies**

RECs coordinate with discipline specialists and the PDT to communicate any updates regarding design changes and the progress of environmental studies. Verify deliverables are being completed according to the schedule.

### **Review Draft DAP plans**

RECs review Draft DAP plans to confirm the project footprint and anticipated impacts are consistent with their understanding of potential impacts. Review the plans for proposed ROW impacts, general construction elements, and previously identified environmental resources (e.g., wetland boundaries accurately noted).

### **DAP Narrative – environmental section**

Prior to DAP Complete, the REC must provide an environmental section of the DAP Narrative summarizing anticipated impacts to environmental resources and required permits/approvals. RECs should provide cost estimates for environmental bid items at each plan review phase (i.e., monitoring or mitigation obligations if they are anticipated).

#### **Complete NEPA PCE Determination**

If not previously completed during the project initiation phase (see above), the REC completes the PCE Determination prior to DAP Complete (if applicable; see NEPA Manual [Section 423: Programmatic Categorical Exclusions](#)).

Once the PCE Determination is signed/approved, the REC notifies the relevant Transportation Project Manager (TPM), ROW agent, and Region STIP Coordinator that FHWA authorization of ROW acquisition can be requested.

#### **No Ground Disturbance (NGD) PCEs**

If the project will not result in ground disturbance, the REC uses the NGD Document to document NEPA classification, determination, and approval. Note that the NGD Document can only be used for no ground disturbance projects that will result in an Endangered Species Act (ESA) finding of No Effect; a Section 106 finding of No Historic Properties Affected; and does not require air quality or noise analyses. For additional information, see the ODOT NEPA Manual [Section 423: PCEs](#).

#### **CE Closeout for ROW acquisition funds**

Federal projects requiring ROW acquisition are typically not provided federal money until NEPA is completed. However, state funds can be used before NEPA completion and be reimbursed from federal funds upon NEPA completion using Advanced Acquisition via the Moving Ahead for Progress in the 21<sup>st</sup> Century Act (Map-21) in accordance with requirements detailed in 23 CFR 710. If the project is a CE and will require ROW acquisition, the CE Closeout needs to be completed shortly after DAP Complete, otherwise an alternative means of ROW acquisition should be considered. The REC should analyze the properties requested for Advanced Acquisition to determine if Map-21 criteria can be met for environmental purposes. For additional information, review the [ODOT ROW Bulletin 09-04\(B\), Chapter 3.320.B of the ODOT ROW Manual](#), and the [NEPA Manual Section 424: CEs](#).

#### **DAP Checklist**

The DAP Checklist identifies 20 submittal requirements at DAP, including environmental deliverables. The REC ensures the following environmental items on the checklist have been completed: documentation of the APE and the PCE Determination (or CE Closeout if applicable and available). Additionally, other environmental coordination items that should be accounted for at DAP (as applicable) include: wetlands and streams are shown in plans and impacts are identified; the API is accurate; water quality strategy included to determine ROW needs; erosion control concept if completed is shown in plans as needed; ordinary high water and mean high tide are located and shown as needed; prospective/mandatory disposal sites are shown in plans as needed; no-work areas are identified and shown in plans as needed.

For additional information and guidance on the DAP Checklist, review the [DAP Checklist Guidance](#) and access the DAP Checklist at the [Roadway Quality Control](#) Quality Control webpage.

## 2.3 Preliminary Plans through Final Plans

### Permit and permit application reviews

RECs review environmental clearances and permit applications (e.g., Section 106, removal-fill permit, ESA consultation) for consistency with the project description and anticipated permits/approvals. Verify any proposed minimization/mitigation measures are attainable by the project (i.e., the terms can be implemented during construction) and ensure the contract documents capture those measures that are contractor responsibilities. The REC also verifies any long-term minimization/mitigation measures are acceptable to ODOT.

### Work with PDT to draft Project Specifications

There are specific [ODOT Standard Specifications](#) for construction that are applicable to all ODOT projects. Some of these specifications are directly applicable to the environmental component of project work and include, but are not limited to, the 180, 245, 280, 290, 320, 1010-1014, 1030, 1040, and 1091 sections.

During project development, the REC may determine that ODOT's standard specifications do not adequately address all environmental commitments. In such instances, the REC coordinates with the appropriate environmental discipline specialists and the project specifications writer to draft Special Provisions for a project. The REC should use the [Boilerplate Special Provisions](#) to the extent possible to generate the project specific Special Provisions (note that only certain sections can be edited without needing an engineer's stamped approval).

For additional information, visit the [ODOT Standard Specifications](#) webpage.

### Complete PCE Approval/NEPA CE Closeout

If not previously done in another phase of the project, the REC completes the PCE Approval or the NEPA CE Closeout for the project as applicable. This deliverable is required a minimum of two weeks prior to the final unsigned Plans, Specifications, and Estimate (PS&E) package (complete package submitted to Tech Center Manager for review and approval) and requires specific documents to be attached. For information on documenting individual resource and discipline analysis, see the ODOT NEPA Manual [Section 426: PCE & CE Discipline Resource Guidance](#). Review the ODOT NEPA Manual [Section 423: PCEs](#) and [Section 424: CEs](#).

### Incorporate avoidance and impact minimization measures

If not previously completed during the DAP development phase (see section above), incorporate applicable avoidance and minimization measures (e.g., adding no-work zones to plans, erosion control measures, on-site monitoring).

## 2.4 Plans, Specifications, and Estimate (PS&E) Package

### **Review plans and specs for consistency with permit conditions**

The REC reviews all plan sets and any specifications for compliance with all permit conditions. The REC works with the PDT to update contract documents if necessary to comply with permit conditions or works with the environmental discipline specialists to modify unattainable permit conditions.

### **Complete the E-STR**

The REC completes the E-STR QC Checklist prior to submitting the PCE or CE documentation package to another REC for the required quality control peer review. The process that the REC will follow to complete the E-STR for their manager prior to submitting their CE or PCE for approval includes:

- REC CE/PCE preparer requests all appropriate discipline specialist clearances and approvals, along with each environmental discipline's appropriate QC form/checklist, to be uploaded to the appropriate ProjectWise Environmental folder within the project file system (see more regarding CE/PCE "sets" below).
- Once the REC CE/PCE preparer receives (or is notified of) each environmental discipline clearance, approval, and relevant environmental discipline QC form/checklist in the ProjectWise Environmental folder, the REC will begin completing the "E-STR."
- Once the REC CE/PCE preparer has completed the CE Closeout or the PCE Approval package and is ready to send it to a REC QC/peer reviewer, the REC preparer also includes the E-STR in the CE or PCE "set." Note that the E-STR may not be entirely complete at this stage (PS&E) as some environmental deliverables can continue after PS&E and into/after construction. The REC preparer continues to be responsible for the E-STR until all relevant discipline deliverables have been completed along with relevant quality control documentation.

A final note: even though there are disciplines listed in the PCE Approval and CE Closeout (the 19 discipline and topic narrative sections) that fall outside of environmental (i.e., hazmat, ROW, etc.), the REC is only responsible for verifying that the "environmental" deliverables (as listed in the E-STR) have had quality control reviews performed.

The Region Environmental Manager and other NEPA Program staff will ensure the appropriate level of environmental discipline deliverable quality control review is done on all required supporting environmental discipline documents via the E-STR QC Checklist signed/dated by the REC. The signed E-STR QC Checklist reflects adequate QC of any supporting environmental discipline deliverable documents.



#### **Upload finalized NEPA documents to ProjectWise**

Once the final versions of all NEPA documents are signed, the REC uploads them to the project ProjectWise folder as well as the NEPA Project Record retained in the Region. For additional information see the [ODOT NEPA Manual](#).

#### **Re-Evaluation Triggers**

If the project scope changes, new environmental impacts are discovered, and/or new environmental requirements become applicable to the project, the REC determines whether a Re-Evaluation of the PCE Approval or CE Closeout is needed. See the [ODOT-FHWA NEPA Re-Evaluation/Supplemental Guidance](#) for additional information.

#### **Commitment tracking**

Commitments, defined by FHWA as the efforts taken to avoid or minimize the environmental impacts resulting from a project, for various resources may be required through the NEPA phase. FHWA expects ODOT to track those commitments through the construction of the project. RECs maintain documentation of the commitments via the “Environmental Commitments” line item on the PCE Approval Form and verify they are completed during the project.

#### **Issue resolution**

Issues may arise from time to time on a project during any stage that require help from management. These issues could include potential permit violations, actions that may undermine fundamental NEPA findings, and unreconcilable differences in rule interpretation with agencies. When this happens, the REC should elevate the issue in accordance with the Region issue resolution process for assistance.

## **2.5 State-Funded Projects**

#### **Track permits/clearances**

Not all projects have or will obtain federal funding. State-only-funded projects without a federal nexus are not obligated to comply with NEPA but are still obligated to follow applicable federal, state, and local laws. RECs should create a file to keep track of permits/approvals for state-funded projects to demonstrate due diligence reviews for consistency with local, state, and federal laws. As with any other project, the RECs coordinate with environmental discipline specialists, as necessary, to assist with due diligence documentation.

State-funded ODOT projects with a federal permit or conducted on federal land have a federal nexus. The REC should determine the applicable NEPA process required for state-funded projects requiring permits when another federal agency is the federal nexus for the project.

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## **Chapter 3 - Construction Management**

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### **3.1 Pre-Construction**

#### **Participate in Pre-Construction Meeting**

RECs present information on sensitive resources, no-work zones, and contract requirements associated with protection of those resources at the pre-construction meeting. RECs use the pre-construction meeting to schedule and establish contractual onsite meeting expectations with discipline specialists if there are sensitive resources present.

RECs provide copies of all permits and approvals to the construction office for the contractor to keep on-site for the duration of construction. RECs review and comment (as applicable) on the contractor schedule to confirm that proposed construction activities are occurring at appropriate times (e.g., in-water work is planned to occur during the in-water work window; landscaping is completed during the planting window). Additionally, RECs review and comment (as applicable) on environmental related contractor submittals (e.g., Pollution Control, Erosion and Sediment Control Plan, Temporary Water Management Plan, Work Containment Plan).

### **3.2 Construction**

The REC is involved throughout construction; however, the REC does not direct on-site work. Only construction management staff direct work unless authority has been delegated otherwise. RECs generally conduct site visits with a construction office representative. Any issues should be directly discussed with the construction office representative.

Pre-work site meetings are required for many types of environmental discipline work before the contractor breaks ground (e.g., temporary water management, cultural monitoring). Refer to the environmental sections in the Standard Specifications and Special Provisions for meeting requirements.

#### **Respond to request for information (RFI) and questions as requested by project manager (or delegate)**

Contractors generally use RFIs to either ask clarifying questions or to request to deviate from the contract. The REC may provide draft responses to RFIs when requested by the construction management office. Draft RFI responses may require coordination with discipline specialists or other agency partners prior to responding.

#### **Coordinate completion of FAHP inspections, resource monitoring, and fish salvages**

On-site inspections are required to comply with the FAHP (when applicable to the project). RECs coordinate with environmental discipline specialists to schedule on-site inspections, resource monitoring, and fish salvages. Each site visit should be documented using the [Environmental](#)

[Construction Inspection Report](#). For additional information, review the [ODOT Guidance for Environmental Inspections](#).

#### **Conduct site visits**

RECs conduct site visits to assist the construction office with compliance. The [Environmental Construction Inspection Report](#) can be used to document site visits. Suggested times for site visits include the beginning of the project to verify the construction limits are appropriately delineated in the field (e.g., erosion control measures, limits of disturbance areas); and during construction activities that pose a high risk of environmental impacts.

## Chapter 4 - Maintenance and Operations

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RECs help maintenance crews maintain compliance with the [Routine Road Maintenance Water Quality and Habitat Guide; Best Management Practices](#) (“Blue Book”) and assist with permitting efforts as needed.

### 4.1 Emergency Response

In an emergency, safety is the priority. RECs take no actions that would impede safety. The district manager (or management designee) determines if the event warrants a declaration of an emergency.

#### **Identify resources that may be impacted**

RECs coordinate with those responding to the emergency to understand the immediate actions that will be taken and how those actions will be implemented. If the response is likely to impact any regulated resources, then existing conditions need to be documented. The REC identifies the sensitive resources and works with the team responding to the emergency to minimize impacts resulting from their response. For example, if a culvert needs to be replaced, the REC can offer guidance (or coordinate between discipline specialists and maintenance) on culvert size or placement to meet fish passage criteria.

#### **Document Impacts**

If impacts to regulated resources are unavoidable, the RECs coordinate with the environmental discipline specialist for that resource. The REC continues to coordinate with the emergency response team to document their efforts as they relate to environmental resources and to convey accurate information to the environmental discipline specialist and/or regulatory agencies.

The REC and/or discipline specialist notifies regulatory agencies and obtains verbal approval and after-the-fact permits as required by the situation. If requested by the district manager, the REC provides input into the documentation needs for federal reimbursement as requested. The REC completes the *FHWA Oregon Division NEPA Disaster/Emergency Documentation for (c) List Categorical Exclusions Funded by FHWA Emergency Relief* (“[ER Document](#)”).

#### Emergency Regulations

FHWA's Emergency Response program can help state and local agencies fund repairs to Federal-aid eligible roads, bridges, and other infrastructure after a natural disaster ([23 USC 125](#): Emergency Relief). ODOT is responsible for requesting emergency relief funds. Additional information and guidance for using the FHWA ER program can be found at the [FHWA ER webpage](#).

ODOT is currently developing an emergency response manual that describes procedures to take during emergencies. Once available, this REC Manual will be updated to include the link to the finished document.

## 4.2 Routine and Annual Maintenance Activities

#### Respond to maintenance requests to review proposed actions

RECs scope the proposed action to determine presence of environmental resources and potential impacts to those resources. The maintenance team should be provided with an understanding how proposed maintenance operations can maintain compliance with the [Blue Book](#) and other regulations (see common rules and regulations section below). If clearances, permits, or approvals are required, the REC coordinates with environmental discipline specialists to provide project information.

#### Complete inspections of ongoing activities

Routine maintenance activities may require inspections from the REC or discipline specialist depending on the activity. The RECs coordinate with the maintenance team and discipline specialists to schedule inspections. Site visits should be documented and provided to the maintenance team. Documentation can be done with an email record, the [Environmental Construction Inspection Report](#), or other form of documentation.

#### Periodically attend crew meetings or provide training on environmental topics as requested by maintenance

RECs provide refresher trainings at the beginning of the season or before certain work activities. These are opportunities to develop and expand relationships and help crews understand the impacts that they may have to the environment and the resources available to them to help navigate the process.

## Chapter 5 - Common Rules and Regulations

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- Oregon Department of State Lands (DSL) Removal-Fill Law – [ODOT: Wetlands](#)
- US Army Corps of Engineers (USACE) Section 404 – [ODOT: Wetlands](#)
- USACE – [Section 408](#)

## CHAPTER 5 - COMMON RULES AND REGULATIONS

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### REGION ENVIRONMENTAL COORDINATOR MANUAL

- Oregon Department of Environmental Quality (DEQ) – [Section 401 Water Quality Certification/Stormwater Management Plans](#)
- Oregon Department of Fish and Wildlife (ODFW) Fish Passage – [ODOT: Fish Passage](#)
- US Coast Guard Bridge Permit – [Bridge Permit Application Guide](#)
- Federal and State ESA – [ODOT: Biology](#); [ODOT: Endangered Species Act](#)
- NPDES – [ODOT: Erosion and Sediment](#)
- Marine Mammal Protection Act (MMPA) – [ODOT: Biology](#)
- Migratory Bird Treaty Act (MBTA) and Bald and Golden Eagle Protection Act (BGEPA) – [ODOT: Biology](#)
- Section 106 –
  - Built Environment – [ODOT: Historic Resources](#)
  - Archaeology – [ODOT: Archaeology](#)
- Section 4(f) – [ODOT: Section 4\(f\)](#)
- Section 6(f) – [ODOT: Section 6\(f\)](#)
- Noise - [ODOT: Acoustics](#)
- Air Conformity - [ODOT: Air Quality & Energy](#)
- NEPA – [ODOT: NEPA](#)
- Environmental Justice and Socioeconomics – [FHWA EJ](#)
- Local Agency Water Quality Rules – local agencies may have regulations in addition to state and federal regulations.
  - [Rogue Valley Sewer Services](#)
  - [Clean Water Services](#)
  - [Water Environment Services](#)
- FEMA Regulated Floodways – [National Flood Insurance Program](#)
- Prime or Unique Farmland – [Farmland Protection](#)
- Coastal Zones - [Oregon Coastal Zones](#)

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