

## Environmental Permit Coordination Unit

The Environmental Permit Coordination (EPC) unit provides **coordination, training and support** to other Department units and consultants on matters related to the preparation of engineering documents that support the environmental documentation for permits required by state and federal laws and regulations. EPC works with Department engineers and consultant engineers and the Office of Environmental Planning (OEP) to coordinate the development of plans, permit-related documents and schedules throughout the entire project design development process.

The main mission of the EPC unit is to improve upon the various facets of the permitting process in order to facilitate the timely delivery of environmental permits for the Department's capital projects. The EPC unit uses its engineering and design experience to enhance the overall Department permitting process. The EPC unit facilitates coordination between the designer and OEP, and, when required, among the designer, OEP and DEEP staff, in order to ensure the project is successfully permitted.

An over-arching mission of EPC is to help continue to advance the **One CTDOT** concept within the Department. Staff should look to break down barriers between those with different roles, expertise, education, and experience so that the Department can benefit from the best that every discipline offers in making projects successful. In doing so, always treat others with respect and approach problems with the intent to resolve them; let go of one-sided positions, and work toward solutions that advance the interests of every unit, division, and bureau. Help others to solve problems at the lowest level. Escalate the problems that can't be solved at the lowest level. Seek out assistance from Department leaders to reduce conflict, not to deepen it. And lastly, always conduct business in a professional manner that supports the Mission of the Department

EPC coordination efforts include, but are not limited to, the following:

### **I. Liaison role between Engineering and OEP and, when necessary, Regulatory Agencies**

Represent Engineering to Planning for all environmental matters. The EPC unit is the central clearinghouse for Engineering. Therefore, members of the unit will, as a matter of practice, be included in the distribution of correspondence and attend meetings that involve environmental permit issues.

- Ensure that expectations of all participants are clear and reasonable
- Facilitate design staff and consultants in understanding, anticipating and properly incorporating environmental restrictions / limitations in their designs
- Facilitate resolution when there is disagreement with proposed project direction between engineering and OEP or regulatory staff
- Ensure appropriate OEP and Engineering staff are represented at project-related meetings and are included on environmentally-related project correspondence. In order to accomplish this; OEP and EPC shall be copied in all such project or program-related correspondence between Engineering, OEP and regulatory agencies.
- Anticipate, identify and work with OEP staff to resolve potential environmental impediments to the project development process

- Work to ensure that environmental direction is clear and understandable, applicable, consistent with the Departments project goals, and based on regulations
- Assist OEP staff in understanding when designers may be restricted by design standards, commitments, funding and schedules
- Organize and facilitate meetings with engineering staff, CE's and OEP as necessary in order to resolve issues and keep projects moving forward smoothly

## **II. Process Improvement**

Review regularly with OEP and DEEP staff environmental requirements, guidelines, and processes in order to identify possible areas for improvement

- Act as the gathering house for problems and suggestions for improvements received from designers, OEP, construction staff and DEEP
- Discuss proposed ideas for changes with the "owner" and work with them on drafting changes, making sure to fully include other units who will be affected by any proposed changes
- Work with Department engineers and OEP to establish and implement a system of performance metrics (both internal and external) to provide data necessary to identifying opportunities for environmental streamlining with greater precision.

## **III. Dissemination of Information**

Assist in ensuring open, proper and timely communication / dissemination of environmental information to Department Engineering and OEP staff

- Ensure timely email distribution of information to keep design staff informed to minimize the potential for staff to do things with outdated information and instructions.
- Develop jointly with OEP, and other CTDOT as appropriate, all required bulletins, directives, guidance documents, manuals, electronic systems and other tools that EPC, OEP, and engineering staff can use to anticipate permit questions and to ensure project quality, constructability and permit-ability
- Review Department webpages and work with the "owner" to ensure that environmental information is up-to-date and correct. Assist others as necessary to ensure accuracy and completeness

## **IV. Training and Support**

Coordinate, distribute and, jointly with OEP, train design engineers and consultant engineers on existing and new regulations and permit application preparation requirements

- Develop jointly with OEP, directives, guidance documents, templates, sample plans, sample permits, details, manuals, electronic systems and other tools that engineering staff can use to anticipate permit questions and to ensure project quality, constructability and permit-ability
- Meet with OEP staff regularly to discuss identified areas for improvement.
- Provide an engineering perspective to OEP staff on engineering design, design standards, funding and schedules

## **V. Review and Respond to proposed federal and state environmental regulations and laws**

Act as the Bureau of Engineering and Construction lead to the Bureau of Policy & Planning for the review and commenting on any and all proposed changes to federal and state environmental regulations and laws.

- Coordinate the involvement of other Bureau of Engineering and Construction units as required
- Recommend to the Chief Engineer proper representation from the Bureau of Engineering and Construction on the review team coordinating a Department response to a proposed change to a federal or state environmental regulation or law
- Convey to regulatory agencies information about challenges the Department experiences in the permitting process
- Convey to regulatory agencies the implications for the Department of potential regulatory changes
- Advocate for regulations that fully consider the Department's needs and concerns
- Work jointly with OEP staff to engage state and federal regulators in an effort to improve and streamline permitting processes

#### **VI. DEEP/DOT Working Group**

Actively participate in the DEEP/DOT Working Group (Group of 8)

- Bring issues to the Working Group, conduct and/or coordinate research on topics
- Create draft initiatives, present at meetings, and prepare final drafts, as required in order to facilitate progress
- Distribute final initiatives and bulletins to Department staff and regulating agencies

#### **VII. PNDF Process**

Facilitate the Permit Needs Determination Form (PNDF) process during the Preliminary Design Phase

- Ensure that the two-step PNDF review process is implemented successfully
- Ensure engineering staff know how to use the PNDF and how it fits into the project development process
- Assist engineering staff in preparing the PNDF and ensure that the project design team is providing the necessary project information to OEP staff in order for OEP to determine the likely permits necessary for the project
- Assist engineering staff and answer questions regarding resource coordination and BMP's for state projects
- Maintain the database for scheduling and tracking PNDF's for active projects
- Coordinate and set up Part 2 meetings and ensure engineers are prepared. Review potential impacts with engineers and OEP to complete Part 2 of the PNDF
- Research and coordinate with designers and OEP to develop candidate project types for an "Expedited PNDF" process.

#### **VIII. Fisheries Coordination**

Coordinate Fisheries requests and inquiries

- Maintain the master database of active projects requiring fisheries coordination

- Work with Engineering staff to establish Department project priorities and communicate those priority projects to OEP and DEEP. Monitor each individual project schedule as it relates to Fisheries Review and Coordination
- Work with OEP staff, design engineers, and DEEP staff to appropriately respond to fisheries questions
- Assist engineering staff to be prepared to address anticipated fisheries questions
- Collect / provide information to engineering staff that will improve on the designer's ability to incorporate fisheries mitigation into a given project

#### **IX. NDDB Process**

- Responsible for maintenance of master Natural Diversity Data Base (NDDB) database
- Assist in coordinating projects with DEEP Wildlife, OEP and engineering staff to minimize effect on both listed species, project delivery and construction.
- Assist in the development of species protective protocols with DEEP Wildlife, OEP, and engineering staff as necessary.
- Coordinate with OEP and project engineers in the development of Wildlife Species Contract Specifications for Section 1.10 Environmental Compliance items to be included in construction contracts, in accordance with Department specification development and modification protocol that ensure protection of listed species and jointly consider project delivery and construction.

#### **X. Wetland/Ordinary High Water (OHW) Delineations**

No specific role for EPC, other than to be informed by OEP.

#### **XI. Plan review process**

Facilitate review process for the 30/60/90% design submissions, and permit reviews

- Help to reduce conflict between OEP and engineering staff by translating, offering suggestions, bridging communication gaps, and improving working relationships
- Work with designers to achieve designs that comply with regulations
- Assist OEP to ensure comments are clear, understandable, and based on regulations. The goal is to have a process that will minimize additional comments / revision iterations
- Promote the inclusion of OEP's informational comments based on past experience, quality control, lessons learned and constructability concerns.
- Work with designers to ensure that a response to comments is provided, and if necessary, to facilitate meetings to discuss comments.
- Create an atmosphere of continuous improvement – helping all Department staff to use past experience, best practices and regulatory standards to improve and streamline the project development process

#### **XII. Design meetings with Engineering, CE's and OEP**

Coordinate, facilitate and participate in design meetings with Engineering, CE's and OEP

- Create an atmosphere of continuous improvement – help all Department staff to use past experience, best practices and regulatory standards to improve and streamline the project development process
- Help to reduce conflict between OEP, engineering and regulatory staff by translating, offering suggestions, bridging communication gaps, and improving working relationships
- Facilitate resolution of disputes between the design engineers, OEP, and regulatory staff to ensure the project moves through the Department’s permitting process expeditiously, while at the same time maintaining the proper balance between engineering design objectives and environmental regulatory requirements or concerns

**XIII. Project presentations to regulatory agencies**

Coordinate, manage, and participate in Department project presentations by Department staff and consultants to regulatory agencies

- Improve the quality of presentations to regulatory agencies
- Help standardize project presentations, providing templates and helping engineering staff to use them effectively
- Work to link presentations to established regulatory review standards and the areas of inquiry expected from regulatory agencies
- Document the response to presentations so that engineering staff can refine their projects and produce materials necessary to secure environmental permits
- Identify projects, priorities and jointly establish agendas for Regulatory Coordination Meetings with OEP and Engineering project managers

**XIV. Draft permit submissions to OEP**

Coordinate with engineers / designers on draft permit submissions to OEP

- Improve the quality of the information submitted to OEP/DEEP/USACE
- Help to standardize project submission templates and assist engineering staff in using them effectively
- Work with designers on preparation of permit plan sets following the new sample plans that have been developed.
- Work with designers to provide complete submissions that comply with regulations. The goal is to avoid impacts while achieving project objectives, and when impacts can’t be avoided, to minimize and to mitigate environmental impacts. Facilitate discussions to balance engineering goals of the project with protection of the environment.
- Reduce review/revision iterations
- Document the response to the submittal so that engineering staff can refine their projects and produce materials necessary to secure environmental permits
- Report poor performance of consultants to project managers for subsequent consultant evaluations
- Provide a briefing semi-annually to the Engineering Administrator at the Senior Leaders Meeting on consultants who are performing poorly with regard to environmental permitting matters
- Coordinate QA/QC review after initial identified need. Work with QA/QC consultant and project manager on improvements

## **XV. Project Environmental Mitigation**

When Project Mitigation is required, coordinate with OEP, engineers, construction and maintenance staff during the Design Phase.

- Coordinate with OEP and Designers possible mitigation requirements
- Assist to identify possible mitigation possibilities
- Work jointly with OEP, designers and the regulatory agencies to ensure that mitigation requirements will meet project goals
- Ensure that when mitigation is required, mitigation requirements are included as are part of the permit and contract documents

## **XVI. Permitting timeframe and project delivery schedule**

Coordinate between the regulatory review and permitting timeframe, and the overall project delivery schedule

- Document recurring project issues and lessons learned
- Identify, and implement approved process improvements in order to streamline project development, and improve quality and constructability of the design
- Identify and implement approved process improvements to improve the quality and "approve-ability" of permit applications
- Facilitate implementation within Engineering and the consultant community of the environmental portion of Microsoft Project for project schedule tracking and planning
- Understand the anticipated project schedule and at the PNDF stage and other critical milestones during the design development, proactively anticipate project schedule problems due to environmental coordination permit timeframes
- Monitor projects to ensure the project design team meets established dates for the delivery of complete permit applications to OEP / DEEP. Meet with the project manager to discuss any concerns or issues related to the delivery of permit applications that will affect project delivery at FDP. Report any issues that are not resolved at the project manager level at the monthly project status meeting
- Work with designers and Contract Documents Unit to ensure all necessary permit-related materials (applications and approvals) are included in the contract documents or added to contract documents by addendum for those projects which advertise in advance of approvals.