

Office of Environmental Planning – Water/Natural Resources Section

The Water/Natural Resources Section within the Office of Environmental Planning (OEP) plays a fundamental role in ecological issues and the development of water resource permit applications required to construct Department capital improvement projects and perform maintenance activities.

This document addresses the roles and responsibilities of the Water/Natural Resources Section of OEP. Within this document “OEP” shall refer to the Water/Natural Resources Section of the Office of Environmental Planning.

OEP is essential to the goal of advancing 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.

OEP (Water/Natural Resources Section) coordination efforts include, but are not limited to, the following:

I. Liaison role with Regulatory Agencies, and with Engineering, Construction, and EPC

Represent Planning to Engineering for all environmental matters. Because OEP is central to environmental permitting for the Planning Bureau and the Department, members of the office will, as a matter of practice, be included in the distribution of correspondence and attend meetings that involve environmental issues.

- Ensure that expectations of all participants are clear and reasonable
- Assist design staff and consultants in understanding, anticipating and properly incorporating environmental restrictions / limitations in their designs
- Anticipate, identify and work with engineers, construction, and maintenance staff, federal and state regulatory staff and Environmental Permit Coordination Unit (EPC) staff to resolve potential environmental impediments to the project development process
- Facilitate resolution when there is disagreement with proposed project direction between Engineering and regulatory staff
- Ensure appropriate Planning staff is represented at project related meetings and are included on distributed project correspondence
- Ensure appropriate Engineering representation occurs at project-related meetings and are included on environmentally-related project correspondence. To accomplish this; EPC shall be copied in all such project or program-related correspondence between Engineering, OEP and regulatory agencies.

- Work to ensure that environmental direction is clear and understandable, applicable, consistent with the Departments project goals, and based on regulations
- Work with designers and EPC to mutually understand the implications of design standards, commitments, funding and schedules
- Participate in, and when necessary, organize meetings with engineering staff, EPC and CE's as necessary in order to resolve issues and keep projects moving forward smoothly

II. Process Improvement

Review regularly with EPC 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, EPC, 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 EPC 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 EPC 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 EPC, and other CTDOT staff 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
- Update the OEP webpage on an ongoing basis to ensure that Engineers have the most updated environmental information possible.

IV. Training and Support

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

- Develop jointly with EPC, and other CTDOT staff as appropriate, 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 EPC staff regularly to discuss identified areas for improvement.

- Provide an environmental perspective to design staff on design standards/requirements, permitting timeframes and design development schedules

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

Act, in coordination with the Bureau of Engineering and Construction, as the Department's lead for the review and commenting on all proposed changes to federal and state environmental regulations and laws.

- Recommend to the Planning Bureau Chief proper representation from the Bureau of Policy & Planning 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 EPC staff to engage state and federal regulators in an effort to improve and streamline permitting processes

VI. DEEP/DOT Working Group

Facilitate and 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

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

- Ensure that the two-step PNDF review process is implemented successfully
- Assist engineering staff to use the PNDF and to understand how it fits into the project development process
- Perform research necessary to complete Part 1 of the PNDF and ensure that the project design team is providing the necessary project information to in order to determine the likely permits necessary for the project
- Use the initial PNDF stage to ensure all environmental project coordination processes are initiated and provide assistance to engineering staff as needed. Such coordination may include, but is not limited to:
 - NDDB (Natural Diversity Database)
 - DEEP Boating Coordination
 - U.S. National Park Service
 - U.S. Coast Guard
- Review potential project impacts with engineers and EPC to complete Part 2 of the PNDF.
 - Northern Long Eared Bat (NLEB) 4(d) Process

- Assist engineering staff in bridging gaps in questions regarding resource coordination and BMP's for state projects
- Provide information necessary for EPC to maintain their database for scheduling and tracking PNDF's for active projects
- Complete the final PNDF when all coordination is complete for projects

VIII. Fisheries Coordination

Direct Fisheries requests and inquiries

- Engage DEEP staff in reviewing and appropriately responding to fisheries questions
- Prepare and /or review fisheries coordination packages to be sent to DEEP.
- Assist engineering staff in preparing projects for successful fisheries review
- Assist engineering staff to be prepared to address anticipated fisheries questions
- Coordinate with engineering staff on which projects require the US National Marine Fisheries (USNMF) Review
- Conduct field meetings at project sites with EPC, and other CTDOT staff as appropriate, to discuss project elements.
- Collect and provide information to engineering staff that will improve on the designer's ability to incorporate fisheries mitigation into a given project
- Provide timely information necessary for EPC to maintain the master database of active projects requiring fisheries coordination
- Work with Engineering staff and EPC to establish Department project priorities, and communicate those priority projects to DEEP. Monitor each individual project schedule as it relates to Fisheries Review and Coordination

IX. NDDB Process

Facilitate the Natural Diversity Database (NDDB) Process during the Design Phase

- Prepare NDDB Forms and send to DEEP Wildlife for Projects that are designed with State Engineers
- Review/Comment on NDDB Forms and send to DEEP Wildlife for Projects that are designed with Consultant Engineers.
- Coordinate projects with DEEP Wildlife, EPC and engineering staff to minimize effect on listed species.
- Provide information necessary for EPC to maintain their database for tracking NDDB's for active projects.
- Coordinate and act as the Bureau's lead 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.
- Assist DEEP in locating listed species and remove them from emergency declaration projects.
- Direct consultant engineers and assist engineering staff in the Incidental Take Report Process with CT OPM to ensure projects can proceed if a listed species is present.

X. Wetland/Ordinary High Water (OHW) Delineations

Manage the Wetland Delineation Process during the Preliminary Design Phase

- For Projects that are designed by State Forces - Perform the Wetland/Ordinary High Water (OHW) Delineation and fill out the ACOE Wetland Delineation Sheets.
- For Projects that are designed by Consultant Forces – Review the Wetland/OHW Delineation and ACOE Wetland Delineation Sheets.

XI. Plan review process

Participate in review process for the 30/60/90% design submissions and permit reviews

- Review and provide comments on the 30/60/90% submissions. Work with designers to achieve designs that comply with regulations. The goal is to avoid impacts while achieving project objectives, and when impacts can't be avoided, to minimize environmental impacts. Facilitate discussions to balance engineering goals of the project with protection of the environment.
- Help to reduce conflict between regulatory/permitting agencies and engineering staff by translating, offering suggestions, bridging communication gaps, and improving working relationships
- Work with EPC to ensure review comments are clear, understandable and based on regulations. The goal is to have a process that will minimize additional comments / revision iterations
- Include informational comments, clearly identified as "Informational", based on past experience, quality control, lessons learned and constructability concerns.
- 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 EPC

Participate in, and coordinate when necessary, design meetings with Engineering, CE's and EPC

- 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 regulatory/permitting agencies and engineering staff by translating, offering suggestions, bridging communication gaps, and improving working relationships
- Facilitate resolution of disputes between the design engineers and regulatory/permitting agencies 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

Participate in meetings among Engineering staff, Construction staff, consultants, EPC, and regulatory/permitting agencies to advance project permitting

- Work with Engineers and EPC to link presentations to established regulatory review standards and the areas of inquiry expected from regulatory agencies

- Review documentation of the response to presentations to help engineering staff refine their projects and produce materials necessary to secure environmental permits
- Identify projects, priorities and jointly establish agendas for Regulatory Coordination Meetings with Engineering project managers and EPC

XIV. Draft permit submissions to OEP

Coordinate with engineers / designers on draft permit submissions

- Help Engineering staff to improve the quality of the information submitted to OEP/DEEP/USACE/USCG
- Help to standardize project submission templates and assist engineering staff in using them effectively
- 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 environmental impacts. Facilitate discussions to achieve engineering goals of the project and balance with protection of the environment.
- Reduce review/revision iterations.
- Assist in documenting 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 EPC for subsequent consultant evaluations
- Provide information for EPC's semi-annual briefing to the Engineering Administrator on consultants who are consistently performing poorly with regard to environmental permitting matters
- Identify to EPC at the earliest possible time, draft permit submissions by consultants requiring a greater need for changes and the possible involvement of the QA/QC consultant.

XV. Project Environmental Mitigation

When Project Mitigation is required, coordinate with EPC, engineers, construction and maintenance staff during the Design/Construction/Post Construction Phase

- Coordinate with Designers possible mitigation requirements
- Identify possible mitigation possibilities
- Work jointly with 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
- Verify the implementation of the mitigation requirements during the construction of the project.
- Manage the monitoring of mitigation sites and convey the information to the state and federal regulatory agencies.

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

- Alert EPC, Project Managers/Project Engineers when the permitting schedule does not correspond to the anticipated project schedule.
- 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
- Assist in 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 PNDP stage and other critical milestones during the design development, proactively anticipate project schedule problems due to environmental coordination permit timeframes

XVII. Other Management and Coordination

Northern Long Eared Bat (NLEB) 4(d) Process

Manage the Northern Long Eared Bat 4(d) Process

- Review individual projects on a yearly basis on how they will affect the NLEB through tree cutting
- Review the Department’s obligation Plan to identify projects with federal funding which would require the 4(d) process
- Prepare 4(d) United States Fish and Wildlife Service(USFWS) submittal forms for projects with federal funding or have federal permits and submit them to USFWS.

DEEP Boating

Assist Designers in DEEP Boating Coordination for projects that may affect DEEP Boat launches or the Boating Public.

U.S. National Park Service

Assist Designers in Wild and Scenic River Coordination by identifying projects that require the coordination and assist them in what is required for the coordination.

US Coast Guard Coordination

Assist the US Coast Guard Review

- Coordinate with Designers on which projects require the US Coast Guard Review
- Provide Designers the most up to date requirements for the review process.
- Review submittals to the US Coast Guard to ensure they are complete.
- Review and Process US Coast Guard Permits.

Task Order Consultant Management

Manage Task Order Consultants to complete tasks OEP does have staff resources available to conduct.

- Manage the Task Order Consultant selection process.

- Develop a scope of work, person hours, and negotiate a final cost for the individual task orders.
- Manage the individual task orders by directing the consultants work, reviewing the documents prepared by the consultant, approving documents and other related assignments, and processing invoices.
- Ensuring consultant evaluations reflect the quality of work the consultant is producing.