



Georgia Department of Transportation

Section 404 Permit Local Coordination Procedures

Update to 2002 Local Coordination Procedures (LCP)

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Today's Agenda

- **Overview**
 - ✓ Purpose
 - ✓ Updates from 2002
 - ✓ Framework & participants
- **Process**
 - ✓ Checkpoint details
 - ✓ Post-PAR project delivery
- **Schedule and Contract Considerations**
 - ✓ Baseline activities
 - ✓ Contract scope
- **Wrap-up**

Purpose of Local Coordination Procedures (LCP)

**Comply with US Army Corps of Engineers
404(b)(1) guidelines which require the
identification of the Least Environmentally
Damaging Practicable Alternative (LEDPA)**

USACE 404(b)(1) Guidelines

Establish a Practicable Alternatives Review (PAR) process

- ✓ Interagency coordination procedures for certain Department projects
- ✓ Required for RGP35 (Special Condition 4) and Individual Permits

Section 404 - Clean Water Act

Requires a permit before dredged or fill material may be discharged into waters of the US

Section 404 Permit Types

- **Individual Permits**
- **General Permits**
 - ✓ **Nationwide Permits**
 - ✓ **Regional Permits**

2018 Regional Permit Thresholds

Permit type†	Document and/or Project type	Area* each crossing	Area* per HUC	Linear feet** each crossing	Linear feet** per HUC
RGP30+ (cf. NW 3)	Maintenance, Repair, Rehabilitation, and Replacement	No threshold	No threshold	Stream modifications only within 100 ft of existing x-ing.	No threshold
RGP31+ (cf. NW 25, NW 33)	Temporary Impacts	No threshold	No threshold	Stream modifications only within 100 ft of existing x-ing.	No threshold
RGP32 (cf. NW 14, NW 23, RP 1)	Replacement of a Bridge with a Bridge	No threshold	No threshold	Stream modifications only within 100 ft of existing x-ing.	No threshold
RGP33 (cf. NW 14, NW 23, RP 1)	Replacement of a Culvert with a Culvert or a Bridge	No threshold	No threshold	Stream modifications only within 100 ft of existing x-ing.	No threshold
RGP34 (cf. RP 96)	Construction on Existing or New Alignment	≤ 2 ac North ≤ 3 ac South	≤ 8 ac North ≤ 10 ac South	≤ 1,500 lf North ≤ 1,000 lf South	≤ 2,000 lf North ≤ 1,500 lf South
RGP35 (cf. IP)	Construction on New Alignment	≤ 4 ac North ≤ 5 ac South	≤ 12 ac North ≤ 15 ac South	≤ 2,000 lf North ≤ 1,500 lf South	≤ 5,000 lf North ≤ 4,000 lf South

Note: Thresholds for **RP 34** and **RP 35** are only for permanent losses, not temporary impacts.

† PCN not required as long as impacts are below 100 linear feet and 0.1 acre AND no effect on resources under Section 7 (ESA) and Section 106 (NHPA).

* Area of jurisdictional wetlands, open waters, and perennial, intermittent, and ephemeral streams.

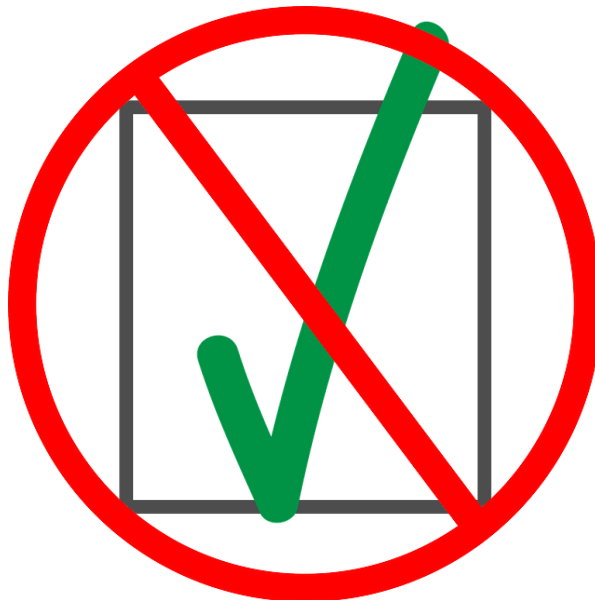
** Linear feet of jurisdictional perennial, intermittent and ephemeral streams.

Practicable?

- **Capable of being done (Merriam Webster)**
- **Available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purposes (40 CFR 230.10(a)(2))**

Why Update?

- **2002 process occurred too late to be truly effective**
 - ✓ Didn't specify when during project development PAR should occur
- **No clear role for non-ecology project delivery team members**



2002 Process Issues Addressed

- **Allows meaningful agency coordination during concept phase before major decisions are made**
- **Begins prior to preliminary design to allow for meaningful avoidance and minimization consideration**
- **Adaptable to project type and project specific details**
- **Clearly defines completion**

Main Differences - 2002 v 2019

2002 trigger – permit type

- ✓ Individual Permits

2019 trigger – project type

- ✓ Major widening
- ✓ New location

Applicability

- **State and federally funded projects**
- **Primarily new projects but adaptable for legacy projects**
- **Compatible with Environmental Impact Statement scoping process**
- **Compatible with design-build delivery**

Framework – Not Prescriptive

- **Occurs during concept phase**
- **Initiated for major widening and new location projects**
 - ✓ **Opt out if apparent that RGP35 or IP thresholds not exceeded**
- **Reach consensus on project specific approach**
- **Combine steps, if appropriate**

Occurs during Concept Phase of PDP

- **The Project Team Initiation Process (PTIP) allows identification of non-widening and non-new location projects likely to require a PAR**
- **Checkpoints begin once schedule is established and staff are assigned**
- **Process ends before Concept approval and A3M**

Process Flow

- **PDP milestone**
- **Project delivery activity**
- **Project personnel**
- **Interagency checkpoint**
- **Information provided by the Department**
- **Agency feedback/checkpoint outcome**
- **Documentation of checkpoint outcome**

Concept Phase and PAR

PDP Milestone	LIMITED TO MAJOR NEW LOCATION & MAJOR WIDENING PROJECTS						Concept Approval										
Project Delivery Activity	PTIP	Baseline schedule approval	Develop initial range of alternatives (including anticipated minor new location sections for existing widenings)	Narrow range of alternatives	Propose Environmental Survey Boundary(ies) for narrowed range of alternatives	Environmental Resource Identification	A3M										
GDOT Personnel	PM & various SMEs	Schedule Review Committee	Designer & environmental SMEs	Designer & environmental SMEs	Designer	Ecologist, Historian, Archaeologist Environmental Analyst	Designer & environmental SMEs										
Interagency checkpoint			1 st checkpoint Early Coordination/ Purpose & Need	For existing widenings, checkpoints 1 & 2 may be combined, if appropriate		2 nd checkpoint Pre-application/ Alternatives	3 rd checkpoint Preliminary LEDPA										
Information provided by GDOT	* submitted to participants prior to checkpoint 1			<ul style="list-style-type: none"> Introduction to project Staff assignment Schedule Preliminary Need & Purpose* Logical Termini &/or Independent Utility* Class of Action (federal-aid) Funding (state v. federal) Project area Are there tolling &/or P3 considerations? For Design-Build – anticipated permit applicant (GDOT or Contractor?) 	<ul style="list-style-type: none"> Alternative(s) Department is considering for advancement Environmental Survey Boundary(ies), i.e., extent of survey area Level of field work for alternative(s) 	<ul style="list-style-type: none"> PAR report Anticipated impacts of alternative(s) being carried forward Justification of GDOT's Preferred Alternative as preliminary Least Environmentally Damaging Practicable Alternative (LEDPA) 											
Agency feedback/ Outcome of checkpoint	<p>Agency participants</p> <table border="0"> <tr> <td>Federal</td> <td>State</td> </tr> <tr> <td><i>Lead</i></td> <td><i>Lead</i></td> </tr> <tr> <td>FHWA (federal-aid) USACE</td> <td>GDOT</td> </tr> <tr> <td><i>Commenting</i></td> <td><i>Commenting</i></td> </tr> <tr> <td>EPA USFWS CG (as needed) NMFS (as needed)</td> <td>EPD DNR-WRD DNR-CRD (if coastal) HPD</td> </tr> </table>			Federal	State	<i>Lead</i>	<i>Lead</i>	FHWA (federal-aid) USACE	GDOT	<i>Commenting</i>	<i>Commenting</i>	EPA USFWS CG (as needed) NMFS (as needed)	EPD DNR-WRD DNR-CRD (if coastal) HPD	<ul style="list-style-type: none"> Red flags, e.g., important resources Concerns with Preliminary Need & Purpose, including Logical Termini &/or Independent Utility Agreement on need to continue to checkpoint 2 	<ul style="list-style-type: none"> Agree or disagree on of alternative(s) being carried forward Agreement on Environmental Survey Boundary(ies) Agreement on level of field work for alternative(s) (including consideration of sections with later schedules) Agreement on need to continue to checkpoint 3 & if field visit required 	<ul style="list-style-type: none"> Agree or disagree with preliminary LEDPA 	
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Documentation of checkpoint outcome	<p>GDOT letter to agencies recapping of discussion</p> <p>Commenting agencies</p> <ul style="list-style-type: none"> Comments on termini Desire to proceed to checkpoint 2 FHWA &/or USACE Agreement on termini Decision on need to proceed to checkpoint 2 			<p>GDOT letter to agencies recapping results of discussion</p> <p>Commenting agencies</p> <ul style="list-style-type: none"> Comments on alternative(s) & level of field work Desire to proceed to checkpoint 3 FHWA &/or USACE Agreement on alternative(s) & level of field work Decision on need for checkpoint 3 	<p>Corps letter to agencies recapping results of discussion & providing concurrence on preliminary LEDA (or lack of concurrence)</p> <p>USACE</p> <ul style="list-style-type: none"> Identification of preliminary LEDPA 	<p>A3M (Avoidance & Minimization Measures Meeting) is attended by design & environmental staff to evaluate measures to further avoid & minimize impacts to environmental resources and results in the identification of a preferred alternative.</p>											
	<p>PTIP (Project Team Initiation Process) uses the input of the Project Manager and various SMEs to understand and develop project scope, begin project development & estimate project engineering budget. The PTIP occurs in the FY prior to the year PE funds are available.</p>																
<p>Practicable Alternatives Review (PAR) Process</p>																	
<p>Also, Aquatic Resources Delineation Verification Request (ARDVR) may be submitted to the Corps before or after A3M.</p>																	

Project Delivery Participants

- **Multidisciplinary approach for project delivery team**
- **Multiple agency involvement**

Benefits of Interdisciplinary & Interagency Process

- **Agency engagement before developing PAR report – reduce review cycles**
- **Early agreement on project termini**
- **Eliminate rework on alternative selection – all disciplines considered**
 - ✓ **Environmental resources identified, generally**
 - ✓ **Foundation for alternatives analysis required for different disciplines**
- **Identify preliminary LEDPA before the start of environmental technical studies**

Project Delivery Team Participation

- **Project Manager**
- **Ecologist**
- **Roadway Designer**
- **Environmental Analyst**
- **Additional Subject Matter Experts, as needed**
 - ✓ **Archaeologist**
 - ✓ **Historian**
 - ✓ **Bridge Designer**
 - ✓ **Construction**

Agency Participation

- **Key Agencies**
- **Commenting Resource Agencies**

Key Agencies

- **US Army Corps of Engineers**
- **Federal Highway Administration (federally funded projects)**
- **Georgia Department of Transportation**

Commenting Resource Agencies

- **Federal agencies**
 - ✓ US Environmental Protection Agency
 - ✓ US Fish and Wildlife Service
 - ✓ National Marine Fisheries Service (marine species and/or anadromous fish)
 - ✓ US Coast Guard (navigable waters)
- **State agencies**
 - ✓ Georgia Department of Natural Resources
 - Environmental Protection Division
 - Wildlife Resources Division
 - Historic Preservation Division
 - Coastal Resources Division (coastal marshlands, tidally influences waters)

- **Focus on major widenings and new location projects**
 - ✓ **PTIP – identify other projects**
- **Framework – not prescriptive, adaptable to project specifics**
- **Occurs during concept phase**
- **Interdisciplinary**
- **Interagency**

Questions?



Three-step Process

- 1. Early coordination/Need and Purpose**
- 2. Pre-application/Alternatives**
- 3. Preliminary LEDPA**

Pre-Checkpoint #1 Activities

- **Project need identified by**
 - ✓ Director of Planning
 - ✓ District Office
 - ✓ Local Government
- **Funding years identified (if accepted), add to**
 - ✓ State Transportation Improvement Program (STIP)
 - ✓ Construction Work Program (CWP)
 - ✓ Long Range Transportation Plan (LRTP)
- **Project Team Initiation Process (PTIP)**
 - ✓ Begin to develop scope and budget
- **Schedule Review Committee**
 - ✓ Establish baseline schedule

Concept Phase following PTIP & Schedule Review Committee

Project Delivery Activity →

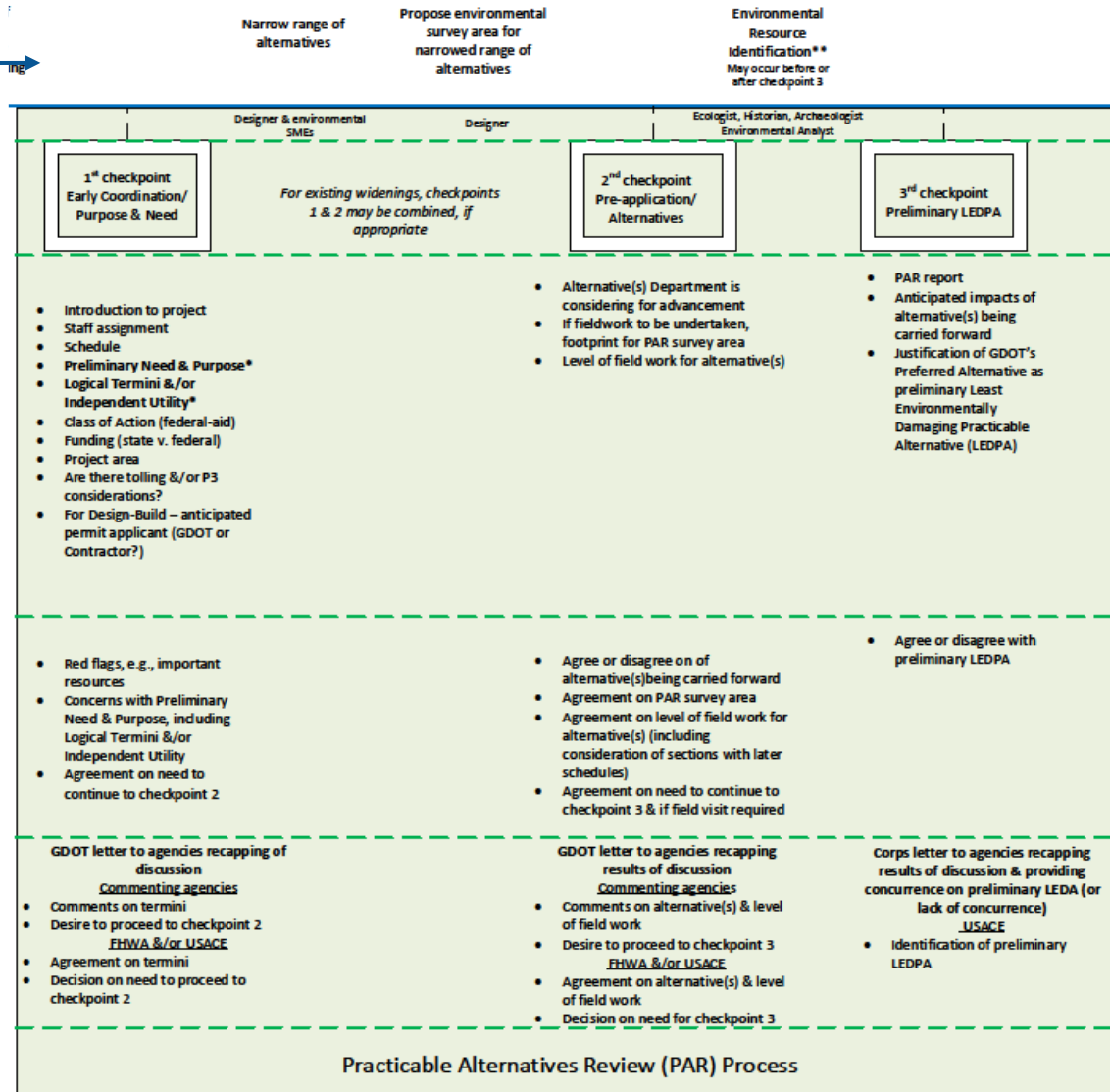
Personnel →

Interagency checkpoint

Information Provided
by GDOT

Agency Feedback/
checkpoint outcome

Documentation of
checkpoint outcome



Checkpoint #1 – Process Flow

PDP Milestone	PE Authorization	
Project Delivery Activity	Develop initial range of alternatives (including anticipated minor new location sections for existing widenings)	
GDOT Personnel	Designer & environmental SMEs	
Interagency checkpoint		<div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>1st checkpoint Early Coordination/ Purpose & Need</p> </div>
Information provided by GDOT		<ul style="list-style-type: none"> • Introduction to project • Staff assignment • Schedule • Preliminary Need & Purpose* • Logical Termini &/or Independent Utility* • Class of Action (federal-aid) • Funding (state v. federal) • Project area • Are there tolling &/or P3 considerations? • For Design-Build – anticipated permit applicant (GDOT or Contractor?)
Agency feedback/ Outcome of checkpoint		<ul style="list-style-type: none"> • Red flags, e.g., important resources • Concerns with Preliminary Need & Purpose, including Logical Termini &/or Independent Utility • Agreement on need to continue to checkpoint 2
Documentation of checkpoint outcome		<p style="text-align: center;">GDOT letter to agencies recapping of discussion</p> <p style="text-align: center;"><u>Commenting agencies</u></p> <ul style="list-style-type: none"> • Comments on termini • Desire to proceed to checkpoint 2 <p style="text-align: center;"><u>FHWA &/or USACE</u></p> <ul style="list-style-type: none"> • Agreement on termini • Decision on need to proceed to checkpoint 2

Checkpoint #1

Early Coordination/ Need & Purpose

- **Information provided**
 - ✓ Preliminary Need & Purpose
 - ✓ Logical Termini &/or Independent Utility
 - ✓ Funding source
 - ✓ Lead federal agency
 - ✓ Criteria for evaluating alternatives prior to field work

Checkpoint #1

Early Coordination/ Need & Purpose

- **Outcomes**
 - ✓ Red flags
 - ✓ Concerns with N&P &/or termini
 - ✓ Concurrence on evaluation criteria
 - ✓ Decision on need to proceed to Checkpoint #2
- **Documentation**
 - ✓ Department letter to agencies recapping discussion

Checkpoint #2 – Process Flow

PDP Milestone			
Project Delivery Activity	Narrow range of alternatives	Propose environmental survey area for narrowed range of alternatives	Environmental Resource Identification** **May occur before or after checkpoint 3
GDOT Personnel	Designer & environmental SMEs	Designer	Ecologist, Historian, Archaeologist Environmental Analyst
Interagency checkpoint	<div style="border: 1px solid black; padding: 10px; width: fit-content; margin: 0 auto;"> <p>2nd checkpoint Pre-application/ Alternatives</p> </div>		
Information provided by GDOT	<ul style="list-style-type: none"> • Alternative(s) Department is considering for advancement • If fieldwork to be undertaken, footprint for PAR survey area • Level of field work for alternative(s) 		
Agency feedback/ Outcome of checkpoint	<ul style="list-style-type: none"> • Agree or disagree on of alternative(s) being carried forward • Agreement on PAR survey area • Agreement on level of field work for alternative(s) (including consideration of sections with later schedules) • Agreement on need to continue to checkpoint 3 & if field visit required 		
Documentation of checkpoint outcome	<p style="text-align: center;">GDOT letter to agencies recapping results of discussion <i>Commenting agencies</i></p> <ul style="list-style-type: none"> • Comments on alternative(s) & level of field work • Desire to proceed to checkpoint 3 <u>FHWA &/or USACE</u> • Agreement on alternative(s) & level of field work • Decision on need for checkpoint 3 		

Checkpoint #2

Pre-Application/Alternatives

- **Information provided**
 - ✓ Alternatives being considered for advancement
 - ✓ Proposed survey boundary for the PAR
 - ✓ Level of field work (if any) for alternatives being advanced
- **Outcomes**
 - ✓ Agreement on alternatives, survey boundary & field work
 - ✓ Consideration of sections with later schedules
 - ✓ Decision on need to proceed to Checkpoint #3 and need for on-site meeting

Checkpoint #2 Input

- **Design**
 - ✓ Gather preliminary data
 - ✓ Determine preliminary design criteria
 - ✓ Receive traffic and crash data
- **Environmental**
 - ✓ Results of early coordination & background research (check report prepared for PTIP)
 - ✓ Known stakeholder interest
 - ✓ Recommendation for level of field work

Checkpoint #2 - Timeline

- **Prior to interagency meeting**
 - ✓ 15 business days – Department submits materials to agencies
 - Map depicting alignment(s)
 - Drawing of alignment(s)
 - Known resources
 - ✓ Agencies can submit questions and/or comments in advance or bring to meeting
- **Following interagency meeting**
 - ✓ 20 business days – Agencies provide written comments to Department
 - ✓ Department prepares & circulates letter with findings

Option to Combine Checkpoints #1 and #2

- **More likely for existing widening projects**
- **Generally a narrower range of alternatives being advanced**

Checkpoint #3 – Process Flow

PDP Milestone	Concept Approval	
Project Delivery Activity	Environmental Resource Identification** **May occur before or after checkpoint 3	A3M
GDOT Personnel	Ecologist, Historian, Archaeologist Environmental Analyst	Designer & environmental SMEs
Interagency checkpoint	<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> 3rd checkpoint Preliminary LEDPA </div>	
Information provided by GDOT	<ul style="list-style-type: none"> • PAR report • Anticipated impacts of alternative(s) being carried forward • Justification of GDOT’s Preferred Alternative as preliminary Least Environmentally Damaging Practicable Alternative (LEDPA) 	
Agency feedback/ Outcome of checkpoint	<ul style="list-style-type: none"> • Agree or disagree with preliminary LEDPA 	
Documentation of checkpoint outcome	<p style="text-align: center;">Corps letter to agencies recapping results of discussion & providing concurrence on preliminary LEDA (or lack of concurrence) <u>USACE</u></p> <ul style="list-style-type: none"> • Identification of preliminary LEDPA 	

A3M (Avoidance & Minimization Measures Meeting) is attended by design & environmental staff to evaluate measures to further avoid & minimize impacts to environmental resources and results in the identification of a preferred alternative.

Also, Aquatic Resources Delineation Verification Request (ARDVRq) may be submitted to the Corps before or after A3M.

Checkpoint #3

Preliminary LEDPA

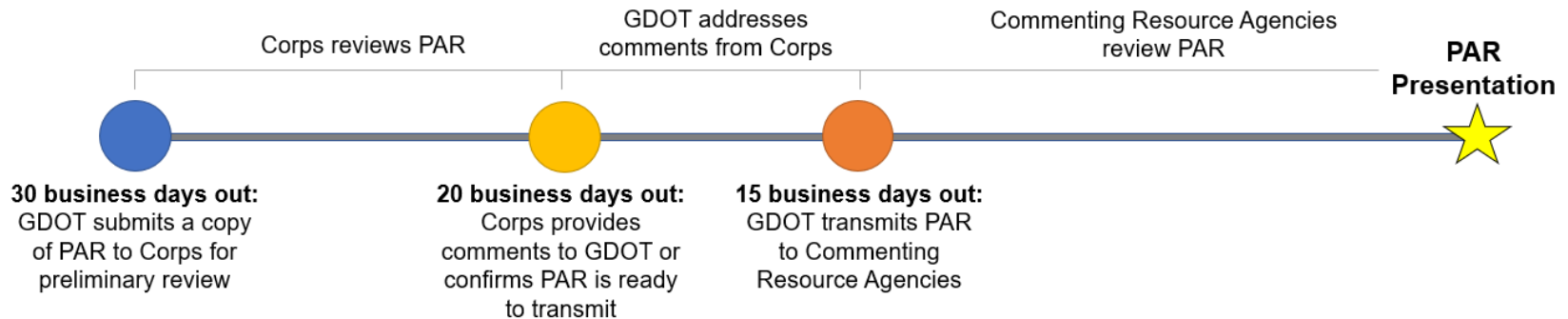
- **Information provided**
 - ✓ PAR report
 - ✓ Comparison of anticipated impacts for each alternative
 - “Apples to apples” comparison
 - Field work results for existing widening
 - Agreed upon comparison from Checkpoint #2, if field work not done
 - ✓ Justification for Department’s Preferred Alternative being the preliminary LEDPA
- **Outcomes**
 - ✓ Agreement on preliminary LEDPA

Preliminary LEDPA Identification

Least adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences

40 CFR 230.10(a)

Checkpoint #3 - Timeline



- **Prior to interagency meeting**

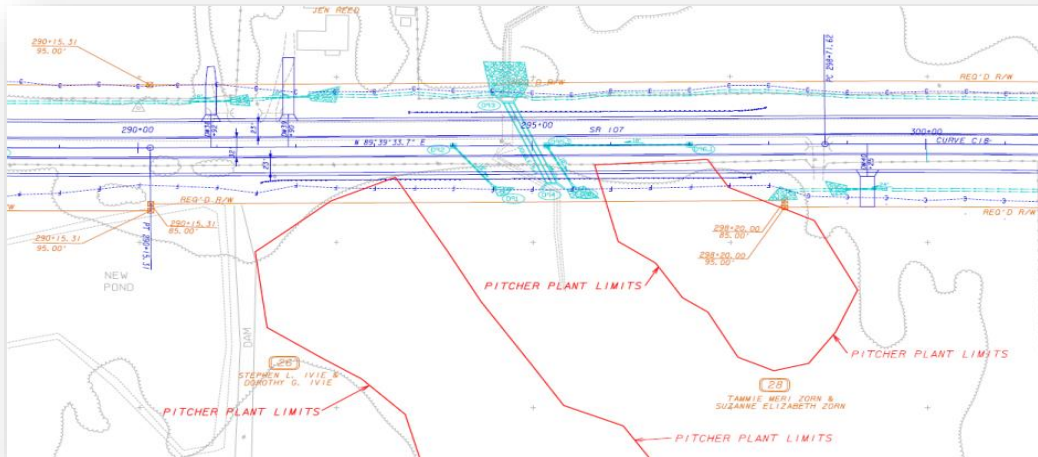
- ✓ **30 business days – Department submits copy of PAR report to Corps**
- ✓ **20 business days – Corps provides comments to Department or confirms PAR report is ready to transmit**
- ✓ **15 business days – Department transmits PAR report to resource agencies**

PAR Completion

- **Corps agrees that preferred alternative is preliminary LEDPA**
 - ✓ Provides concurrence letter to Department within 10 business days of PAR meeting
- **Corps **disagrees** that preferred alternative is preliminary LEDPA**
 - ✓ Corps conducts an independent analysis of the project and appries Department of its findings within 20 business days of PAR meeting

PAR v A3M

PAR →



← A3M

Project Advancement Post-PAR

- **Concept approval**
- **A3M – Avoidance & Minimization Measures Meeting**
- **Environmental technical studies**
- **NEPA document (if federal-aid)**
- **Preliminary Field Plan Review (PFPR)**
- **ROW authorization**
- **404 permit application**
- **Final Field Plan Review (FFPR)**
- **Construction**

Recap

- **Project identification**
 - ✓ Funding years
 - ✓ Funding source
 - ✓ Schedule
- **Three checkpoints**
 1. Early coordination/Need & Purpose
 2. Pre-application/Alternatives
 3. Preliminary LEDPA
- **Option to combine Checkpoints #1 & #2**
- **Advance preliminary LEDPA**

Questions?



Schedule & Contract Considerations

- **P6 activities**
- **Contract scope**

P6 Activities – Checkpoint #1

- **Checkpoint 1a – “Introduce Project to Agencies” (Activity 01712)**
 - ✓ Follows Project Framework Agreement and Procurement
 - ✓ No concurrent P6 design activities
- **Checkpoint 1b – “Decide if PAR process will continue” (Activity 01719)**
 - ✓ Completes Checkpoint #1

P6 Activities – Checkpoint #2

- **Checkpoint 2a – “Evaluation for alternatives carried forward” (Activity 01732)**
 - ✓ **Precedes start of concept development activities**
 - ✓ **No concurrent P6 design activities**
 - ✓ **Precedes environmental resource identification**
- **Checkpoint 2b – “Agency evaluation of alternatives” (Activity 01742)**

P6 Activities – Checkpoint #2 (cont'd)

- **Checkpoint 2c – “Submit range of alternatives” (Activity 01749)**
 - ✓ **Completes Checkpoint #2**
- **P6 successor activities**
 - ✓ **Start concept activities**
 - ✓ **Start environmental resource identification**

P6 Activities – Checkpoint #3

- **Generally begins following identification of environmental resources**
- **Checkpoint 3a – “Prepare PAR report” (Activity 01762)**
- **Checkpoint 3b – “Review of PAR report” (Activity 01772)**

P6 Activities – Checkpoint #3 (cont'd)

- **Checkpoint 3c – “Hold Interagency PAR meeting” (Activity 01782)**
- **Checkpoint 3d – “Submit least damaging alternative” (Activity 01799)**
 - ✓ **Completes Checkpoint #3**
- **Followed by design activity**
 - ✓ **Finalize Concept Report (Activity 19362)**

Legacy Projects

- **Consideration of work completed to date**
- **Discussion with Corps on appropriate “jumping on” point**

Information Provided

Checkpoint #1

	Preliminary Need & Purpose
	Logical Termini &/or Independent Utility
	Funding source & lead federal agency
	Criteria for evaluating alternatives prior to field work

Checkpoint #2

	Alternatives being considered for advancement
	Proposed survey boundary for the PAR
	Level of field work (if any) for alternatives being advanced

Checkpoint # 2 Entry

Checkpoint #1

√	Preliminary Need & Purpose
√	Logical Termini &/or Independent Utility
√	Funding source & lead federal agency
√	Criteria for evaluating alternatives prior to field work

Checkpoint #2

	Alternatives being considered for advancement
	Proposed survey boundary for the PAR
	Level of field work (if any) for alternatives being advanced

Checkpoint #3 Entry

Checkpoint #1

√	Preliminary Need & Purpose
√	Logical Termini &/or Independent Utility
√	Funding source & lead federal agency
√	Criteria for evaluating alternatives prior to field work

Checkpoint #2

√	Alternatives being considered for advancement
N/A	Proposed survey boundary for the PAR (new location)
√	Level of field work (if any) for alternatives being advanced

Contract Scoping for PAR

- **Include tasks and hours in Task Order for concept development**
- **Include separate tasks and hours for each checkpoint in workhour spreadsheet**

Additional PAR Activities Not Included in Project Scopes

- **Checkpoints #1 & #2**
 - ✓ Interagency meeting and notes
 - ✓ Memo on results of background research & early coordination (if PTIP report doesn't include)
 - ✓ Compilation of information
 - ✓ Letter recapping discussion
- **Checkpoint #3**
 - ✓ PAR Report
 - ✓ Meeting notes

- **P6 activities for each checkpoint**
- **Transitioning legacy projects – consider work completed to date**
- **Activities and hours included in concept development task order**

Questions?



Anticipated Benefits

- **Early agency engagement**
 - ✓ Eliminate delay due to late concerns with termini
- **Limit cycles of alternative considerations**
 - ✓ All environmental disciplines part of discussion
- **Outcomes of each checkpoint stipulated**
 - ✓ Corps agrees or disagrees with preliminary LEDPA



Least Environmentally Damaging Practicable Alternative

Least adverse impact on the aquatic ecosystem, so long as the alternative *does not have other significant adverse environmental consequences*

40 CFR 230.10(a)

Planned Guidance Material

- **Overview and pre-Checkpoint #1 guidebook**
- **Checkpoints #1 and #2 guidebook (including checklists)**
- **Template for information provided during Checkpoints #1 & #2**
- **Checkpoint #3 (PAR report) guidebook**
- **Transitioning legacy projects guidance**
- **Roles and responsibilities guidebook**
- **PAR report outline/template**

Activities leading to rollout

- ✓ **July 22 – preview rollout with ecologists**
- ✓ **July 26 – draft guidebook outlines**
- ✓ **August 1 – meet with practitioners from different offices to discuss rollout**
- ✓ **August 19 – draft guidance material**
- ✓ **August 28 – signing ceremony!**
- ✓ **September 5 – introduction to GPTQ ecology subcommittee**
- ✓ **September 11 – pilot rollout**

