

Applicablility Relationship to the Environmental Resource Impact Table Environmental Commitments Table Sections At Project Milestones Additional Guidance

APPLICABLILITY

The Environmental Commitments Table (ECT, also known as the "green sheet") summarizes the environmental resources to be shown on the plans and all environmental commitments required at the project's preconstruction, during constructions, and post construction phases. All GDOT projects (state-funded and federal-aid projects) require ECTs during their development. The ECT is adjusted throughout the project's development. It is initially drafted ahead of the field plan reviews and follows the project through key milestones: environmental document approvals, both right-of-way (ROW) and Let Certifications, and construction.

RELATIONSHIP TO THE ENVIRONMENTAL RESOURCE IMPACT TABLE

The ECT provides the road map that designers and other project team members use to develop the Environmental Resource Impact Table (ERIT). The ERIT appears in the General Notes section (Series 4) of the plans and lists delineated resources, environmental special provisions, and environmental permit information. The ECT and the ERIT are *not* one and the same, but the information detailed in the ECT is used to inform what resources and information should appear in the ERIT. As the project develops, the ECT is used to update the information in the ERIT. The ECT also creates a record to prove that project team members reviewed the ERIT and the plan sheets, ensuring that commitments to the project's environmental resources are shown correctly.

ENVIRONMENTAL COMMITMENTS TABLE SECTIONS

The ECT is composed of multiple sections, each serving a specific purpose to track project commitments.

Header and Review Block

Header Example:

ENVIRONMENTAL COMMITMENTS TABLE	Date: 8/21/202X
Let Sponsor: GDOT LET	Stage: ROW Authorization
PI#: 001999X County: King	Record Plan Set Date: 7/19

The left-hand side of the header is a place to include basic project information. This will not change as the project develops. However, the Environmental Analyst will update information on the right-hand side of the header at every project stage (e.g. ROW Authorization). It includes the date the ECT is updated, the transmittal date of the plans reviewed by the environmental team (if available, enter "NA" if not available), and a dropdown menu indicating the project stage. The transmittal date for the plans can refer to a record plan set date (provided by the designer) or the date of the email where design conveyed the plans to the environmental team.

Review Block Example:

Review
lf no
commitments,
Env Analyst
may approve
for all

GDOT PM & PM's manager assert that commitments are feasible. GDOT PM Name & Initials: Joachim Bluejay 18 GDOT PM's Manager Name: Debra Cardinal GDOT PM's Manager Signature/Date: Debra Cardinal 8/20/202X Engineer of record (EOR) asserts that plans incorporate (or will incorporate) applicable commitments. EOR (or GEC-P.E.) Name: Frank Finch Signature/Date: Frank Finch 8/20/202X

et Date: 7/19/202X

GDOT Env SME Initials & Review Date. <u>Air/Noise</u>: MK 8/19/2X <u>Arch</u>: HM 8/19/2X <u>Eco</u>: CG 8/19/2X Hist: MW 8/19/2X Env An: DB 8/19/2X

The review block captures signatures, initials, and dates of the ECT review. As the project advances and the ECT is adjusted and reviewed, the review block will be updated to reflect the latest reviews. It may contain actual signatures and initials or the names and dates may be typed by the Environmental Analyst. If typed in, emails confirming review and approval from all reviewers must be kept in ProjectWise.

The Environmental Subject Matter Experts (SMEs), on the right-hand side of the block, refer to the assigned GDOT Environmental SMEs – not consultant Environmental SMEs. However, the Engineer of Record (EOR) may refer to a GDOT Design Lead or a consultant Design Lead depending on the make-up of the project team.

A. During or Post Construction Commitments/Requirements

Section A Example:

A. During or Post Commitments/Requirements

During or Post		Commitment	Reference Document	Office and/or Title of Responsible Party	*Responsible Party to Document Completion
A-1	During	The construction contractor shall not conduct directional boring underneath the Ogeechee River (critical habitat for sturgeon) or any of the listed locations.	Ecology AOE Addendum 6/23/202X	Construction Contractor	GDOT District Construction Engineer Sign Date
A-2	Post	GDOT will oversee a study of visual impacts from roadway widening on rural corridors. The results of this study will be documented in a white paper.	MOA, 1/21/2X (Stipulation II)	GDOT OES- History	GDOT OES – History Sign Date
A-3	During	Conservation fund payment to offset the impacts of tree- clearing, as prescribed in the Georgia Bat Programmatic Agreement	Georgia Bat Programmatic Agreement	GDOT OES- Services - Ecology	GDOT OES – Ecology Sign Date

(* Responsible Party to Document Completion with a date or other relevant details; initial (or sign) the cell.)

Section A lists during or post-construction commitments. The table describes the commitment and the source or reference document where the need for the commitment originated. It also identifies the Office or Title of Responsible Party. This is the entity that will actually complete the commitment. Next, it lists the party responsible for documenting the completion of the commitment. Example A-1 shows that the construction contractor is responsible for completing the commitment and the GDOT District Construction Engineer is responsible for ensuring it is complete. In some cases, the party responsible for completing the commitment is also responsible for documenting its completion, as in example A-2.

The Environmental Analyst must coordinate with Environmental SMEs and the Project Manager (PM) to identify the responsible party for each of these commitments. Through this coordination, the responsible party must determine the feasibility of the commitment and detail how the commitment will be fulfilled. The project team must also document this coordination to ensure that there is no confusion as the project advances.

As these commitments are completed, the party responsible to document completion will coordinate to update the ECT with the details of the commitment's completion, including signatures within the table and on the last page of the ECT for during construction commitments. Additionally, documentation ensuring the commitment's completion must be included in the project's file.

B. Special Provisions

Section B Example:

B. Special Provisions

	Special Provision	Purpose of Special Provision	Date of Transmittal
B-1	107.23.G	For the protection of migratory birds and bats	6/23/2X
B-2	107.23.H	For the protection of ecological resources	6/23/2X
B-3	107.13.J	For the protection of cultural resources within project areas	1/21/2X

(Attach any environmental Special Provisions with transmittal letters to this document.)

Section B lists the environmental special provisions included with the project plans and contract documents. They are typically developed in the Cultural Resource Assessment of Effects (AOE) or the Ecology AOE; however, they can also be developed to protect other resources or in response to public involvement. Some examples include provisions to protect endangered species and provisions regarding the timing of closures to public recreational resources, such as boat ramps. The construction contractor is responsible for following the terms of the special provisions.

The responsible Environmental SME should coordinate with the project team – including the PM and the designer – to determine the feasibility of the special provision. The feasibility of a special provision may also be discussed with the construction engineer. If there is any question about its feasibility, the PM, designer, and Environmental SME should discuss its feasibility with construction before accepting it.

If the special provision is available, the date of the special provision must be listed in the ECT, under "Date of Transmittal" on the right-hand side. This identifies the latest version of the special provision. It is critical that the project team ensures the latest version of the special provision is in the construction contract documents. Review of the ECT should include review of the special provisions' dates to ensure they are accurate. If a special provision is updated by the Environmental SME, that updated special provision must be shared with the PM and the date of the latest special provision must be included in this column of the ECT.

Also, the special provision itself should convey the details, not the "Purpose" column of the ECT. The "Purpose" column should be brief. The special provision must be available by the time the project is certified to let. All available special provisions must also be attached to the ECT when included in environmental documentation and environmental certifications.

C. Necessary Permits, Stream Buffer Variances, and Mitigation Credits

Section C Example:

C. Necessary Permits, Stream Buffer Variances and Mitigation Credits

Permit, Variance, Mitigation Credits, Etc.		Additional Info (permit expiration date, number of credits needed, etc.)	Status (Acquired or not acquired, if acquired include date)
C 1	Notice of Intent (NOI) for NRDES	The Office of Bidding Administration and Construction Contractor will submit a NOI to the	Will be acquired
C-1 Notice of Intent (NOI) for NPDES		NPDES General Permit following award of the contract but prior to construction.	following Let
C-2	2-2 CWA 404 Permit A Regional Permit #34 will be required for impacts to jurisdictional waters.		Not acquired
C-3	Stream Mitigation Credits	441.75 stream credits (4, 589 legacy)	22
C-4	Wetland Mitigation Credits	0.01 wetland mitigation credit (0.08 legacy)	ee
C-5	Buffer Variance	Anticipated for the non-exempt encroachment under Criterion (a)	25
C-6	Buffer Mitigation Credits	TBD with final plan development	cc

(Attach all materials associated with above items with transmittal letters to this document, if applicable to the stage.)

Section C lists the environmental permits, buffer variances, and mitigation credits required for project development. The environmental permits typically refer to permits required by Section 404 of the Clean Water Act. Sometimes other requirements may be listed here, such as cemetery permits and Tennessee Valley Authority permits.

Typically, permits and their requirements are based on construction impacts to ecology ESAs as reported in the Ecology AOE or its latest addendum. As a result, changes to impacts to these ESAs require changes to these requirements. The Ecologist should be in close coordination with design regarding these requirements throughout the Preconstruction Phase.

Most items listed in this section must be acquired prior to certifying the project for let. Once acquired the right-hand column should note the date of acquisition. The National Pollution Discharge Elimination System (NPDES) permit is one exception. It is required *after* letting by the construction contractor, but prior to the start of construction.

D-F Preconstruction Commitments/Requirements

Sections D-F are preconstruction commitments. These commitments must be completed prior to the project's environmental certification for let.

Section D Example:

D-F. Pre-Construction Commitments/Requirements

D	Commitment	Applicable Resource(s)	Reference Document	Office and/or Title of Responsible Party	Status
D-1	Permanent Archival Record packages	F-6, F-8, and F-9	MOA 9/21/21 (Stipulation I)	GDOT OES-History	Incomplete
D-2	Provide project designer noise envelope for proposed noise barrier (Wall 2) along SR 81 WB: Society Street Housing Development; 1329 ft long by 14 ft tall	NA	Type I Noise Assessment, 12/2021	GDOT OES-Noise (to provide noise envelop) and Project Designer (to create noise wall design sheets)	Incomplete
D-3	Public outreach with property owners and tenants of benefited receptors regarding proposed noise abatement, per GDOT Noise Policy will be completed	NA	"	GDOT OES-Noise	Incomplete

(Examples are Environmental Resource Impact Table (ERIT) listings, a design feature, a plan sheet note, etc. If the item is no longer required, move to Section G with explanation.)

Some examples of Section D commitments include design features that must appear on the plans and/or described on the ERIT. These may include details related to temporary work bridges, noise abatement features, or other project features developed through cultural resource coordination. Other examples may include commitments to complete Underground Storage Tank and Hazardous Waste studies and certifications related to floodplains.

Sometimes Section D commitments relate directly to resources, listed in the applicable resource column of the table. The table also describes the source or reference document where the need for the commitment originated. It also identifies the Office or Title of Responsible Party. As with other commitments, the project team must consider the feasibility of the commitment and confirm its feasibility with the responsible party. Once the commitment is included, it cannot be changed without updating environmental documentation and possibly reengaging the public. Lastly, the table must include the status of the commitment, incomplete or complete. If the status is complete, the table should include the date it was completed. By final plans, most of these commitments should be complete. If not, on time Certification for Let may be at risk.

Section E Example:

E	*Public Outreach	Additional Information	Status
⊏ 1	PIOH Response	The PM and Project Designers will coordinate with Hogg's Garage owner about median	Complete 3/24/202X
L-1	Letter 2/23/202X	access.	Complete 5/24/202X

(* Any response letter obligations for future consideration.)

Section E of the ECT lists commitments made that directly relate to public involvement. These commitments typically originate through public involvement response letters. The project team must consider the feasibility of these commitments before sending a public involvement response letter or communication. Depending on the project's phase, an ECT may not be developed at the time of the public involvement. In this situation, the Environmental Analyst may need to track these commitments with a draft ECT or some other means.

The table will include the date of the letter or communication. It will also include information about the commitment, and it is helpful to include who will be responsible for completing

the commitment. Lastly, the table must include the status of the commitment and, if it was completed, the date of completion.

Section F Example:

F	Resources (Category)	Impacts or Effect Findings for Resources (if no impacts, state "no impacts/no permitted construction activity")	Was this updated from previous ECT? (NA if first ECT for project)	Name and Date of Report	Are all resources correct on the plans and ERIT?
F-1	Open Waters	No impacts	Yes	Ecology Resource Survey and Assessment of Effects Memorandum 2, 8/2/2X	Yes
F-2	Wetlands	0.022 acres	£6	"	**
F-3	Streams	0.106 acres (approx. 475 linear ft)	ee	"	"
F-4	State Water buffer	See ERIT for exemptions or fill- clearing impacts.	55	"	££
F-5	Price House	No adverse effects	No	Cultural Resources Assessment of Effects Addendum, 8/9/2X	"
F-6	Vincent House	Adverse effect	"	11	"
F-7	Douglas House	No adverse effects	ee	11	"
F-8	Rogers House	Adverse effect	**	"	"
F-9	H. Roy House	Adverse effect	"	"	"
F-11	Donald House	No adverse effects	"	"	"
F-12	Glover House	No adverse effects	ee	11	"
F-13	Adams House	No adverse effects	"	11	"
F-14	Resource 1	No effect	"	ESA Letter 4/6/2X	**
F-16	Identified UST / Haz Potential sites	5 sites identified, info shown on ERIT and general notes	"	Phase 2 Environmental Site Assessment, 9/7/2X	"

("PFPR Stage can list 'Incomplete' under last column if applicable; however, for CST - 'Yes' is required.) For individual resources refer to technical reports and/or ERIT - the following resources are outside the project's limits or do not appear on individual plan sheets or ERIT: LIST RESOURCES HERE-if applicable.

Section F lists or summarizes the resources to be delineated on the plans and/or listed in the ERIT. Its primary purpose is for the Environmental Analyst and the Environmental SMEs to document their review of the plans and the ERIT and assert that the plans and the ERIT correctly show environmental resources.

For ecology resources, the table includes a summary of the impacts to Waters of the US and state buffers. It does not list each individual resource. It also summarizes the impacts to these resources. The table includes a column to note if the impacts have been updated since the previously approved ECT. The table also includes a column with the source or reference document where the impacts to the resources are documented. Lastly, it includes a column that notes whether the summary of resources and impacts are accurately shown in the plans and the ERIT.

For cultural resources, the table is comparable to ecology resources except that it lists the cultural resources individually. Another difference is that it lists the effect findings for the resource only. It does not provide detail that quantifies impacts to cultural resources.

Other resources may be included in Section F as well. For example, parcels identified as a concern for underground storage tanks (UST) and hazardous waste sites should be included. The table should include a summary of these parcels and the column notes that the related requirements are accurately shown in the plans and ERIT. Other examples may include boat ramps or other recreational resources, where coordination a resource agency has determined special notes or considerations need to be shown on the plans.

For pre-construction commitments related to Section F to be considered complete, the righthand column must assert that "yes" all resources are correct on the plans and the ERIT. *If the resources are not correct on the plans, then the project cannot be Certified for Let because the contractor will not be able to effectively protect the resources during construction.*

G. Items No Longer Applicable to Project

Section G Example:

Resource/Item/Commitment		General Description	Reason No Longer Applicable
B-4	105.11	Special provision related to hazardous materials and USTs	Now covered by a standard specification
F-10	Harris House	An eligible history resource	Structure was demolished approx. Dec 202X (refer to the Jan 2X Reevaluation report).
F-15	Resource 2	Described in ESA Letter 2/1/2X	Project limits shifted and no longer on plans

Section G describes environmental commitments that are no longer applicable to the project. They can be of any type or category listed above. The purpose of this section is to document that these commitments were once part of the ECT, but – due to several potential issues – they are no longer needed. Some examples might include a resource from Section F that is no longer present along the project corridor; a public outreach commitment from Section E that may no longer apply due to project changes; or a special provision from Section B that is no longer needed. This section identifies the commitment by its previous number in the sections above, its name, a general description, and a brief statement as to why it is no longer applicable. For federal-aid projects, the Reevaluation of the NEPA document will also document the change to the commitment.

In previous versions of the ECT, commitments might be "struck through" if they were no longer applicable. In the latest version, they should be collected here. *As a result, this version of the ECT includes no strikethrough text in any section.*

Mitigation and Signature Block

The last two items on the ECT are the Estimated Mitigation Cost and the "If project is complete or under construction" signature block.

Estimated Mitigation Cost Example:



The Estimated Mitigation Cost is a sum of the estimated costs of the mitigation needs for the project. Typically, these are the mitigation credits required by Section 404 Permits. The Ecology AOE will detail the mitigation needs, but the Ecologist will need to request an

estimated cost from OES. The PM will use this information to ensure the project's budget can cover the mitigation costs. If the Ecology AOE has not been completed, this section may be blank.

"If Project..." Signature Block Example:

If project is Complete or Under Construction: Area or Construction Engineer (or equivalent under Design/Build) affirms by signature below that all Special Provisions, ERIT Comments, and During Construction Commitments were adhered to during the project's construction.

Please Print Name and Title:

_ Signature: _____ Date: _____

If a Reevaluation is required while the project is under construction or a post-let activity results in changes to the commitments documented in the ECT, then a revised ECT is required. Review of the ECT must be documented (with signatures/initials or emails) in the review block. Additionally, the "If Project is Complete or Under Construction..." signature block must be signed by the Area or Construction Engineers. If the engineer is unable to affirm that during construction commitments were adhered to, then an explanation must be provided to the PM and OES. Additional agency involvement and environmental documentation may be needed to determine the consequences. Once signed, the ECT is returned to OES for filing purposes.

Attachments

Sections B and C identify some materials to attach to the ECT. This is particularly important for ECTs prepared for Environmental Certifications and NEPA document approvals. These materials include:

- > Special Provisions (identified in Section B) with transmittal letters, if applicable;
- > Clean Water Act Section 404 Permits;
- > Steam Mitigation Credits (proof of acquisition);
- > Wetland Mitigation Credits (proof of acquisition);
- > Buffer Variances;
- > Buffer Mitigation Credits (proof of acquisition); and
- > Any other necessary permit, if acquired.

AT PROJECT MILESTONES

An up-to-date ECT is required at several project milestones (or stages) identified in the header. Depending on the milestone, the ECT may require different details regarding its commitments, completion of the commitments, and different levels of review. The ECT evolves as the project develops, and the Environmental Analyst may begin developing the ECT as early as Resource Identification. The following discussions list the project milestones and indicate what is required of the ECT at each.

Preliminary Field Plan Review - Draft ECT

In preparation for the Preliminary Field Plan Review (PFPR), the PM will request a draft ECT for the designers to use to develop the ERIT and include in the PFPR plans. The ECT will be reviewed by the entire project team as part of the PFPR. The feasibility of commitments, including environmental special provisions and minimization efforts discussed at the Avoidance and Minimization Measures Meeting, will be discussed as part of this review. At this milestone, technical studies are typically complete and details from these documents should be included in the ECT. Prior to sending it to the PM, the ECT should be circulated to the Environmental SMEs for review and comment. Review block signatures/initials are not required.

Right of Way Authorization

Ahead of ROW Authorization, the ECT must be reviewed by the project team. Resource impacts, special provisions, permits, and other commitments listed on the ECT must reflect the latest technical studies. The review must be documented (with signatures/initials or emails) in the review block.

For federal-aid projects, the ECT must be included with the NEPA document and must be approved by the Federal Highway Administration (FHWA) or by OES through the Programmatic Categorical Exclusion (PCE) agreement. The ECT review must be complete with signatures/initials before the Environmental Analyst submits it to OES for review and submittal to FHWA for NEPA document approval. NEPA document approval is required prior to Environmental Certification for ROW Authorization.

Regardless of project funding, any commitments that must be completed prior to ROW Authorization must be completed and marked complete on the ECT before the Environmental Certification for ROW Authorization.

Final Field Plan Review Preparation

In preparation for the Final Field Plan Review (FFPR), the ECT should be updated to document any changes to resource impacts, latest special provisions, permit requirements and mitigation, and other commitments. The Environmental SMEs and the Environmental Analyst must ensure the ECT reflects the latest technical study addendums. Additionally, the ECT is used at this stage to document that the FFPR plans incorporate the commitments and the impacts to resources reflect the latest technical study addendums and anticipated permits. Prior to sending it to the PM, the ECT should be circulated to the Environmental SMEs for review and comment. The ECT will be reviewed again by the entire project team as part of the FFPR. Updated review block signatures/initials are not required. Preconstruction commitments should be complete or near complete at this review.

For federal-aid projects, a Reevaluation of the NEPA document is typically required at this stage. As a result, the ECT must be updated, reviewed, and signed before the NEPA Reevaluation can be submitted to OES for FHWA review and approval. This is usually the final Reevaluation prior to letting the project to construction. After approval of this

Reevaluation, there should not be any more changes to resource impacts, additional commitments, permit requirements, or hot button changes.

Regardless of project funding, preconstruction environmental commitments may not be complete at this milestone; however, the project team should have a plan to ensure they are complete prior to the next milestone – Environmental Certification for Construction Authorization.

Construction Authorization (Let)

Prior to Let Certification, the ECT must be updated, and its review must be documented. Any preconstruction commitments must be marked "complete" or "correct on the plans and the ERIT" at this milestone. All environmental special provisions must be available and attached to the ECT showing the correct date of transmittal. The permits, buffer variances, and mitigation must also be acquired and marked as such on the ECT. The proof of any permit and buffer variance approval and mitigation acquisition must also be attached to the ECT. All resources must be correctly shown on the plans and in the ERIT table. Additionally, commitment-related design features must be correctly shown on the plans. The review must be documented (with signatures/initials or emails) in the review block before certification.

Under CST Changes (Use on Construction)

If an ECT is required for project documentation during construction, typically because of an unanticipated project change that affects environmental resources, then a signature in the "If Project..." review block from the GDOT area or construction engineer is required. This affirms that these commitments (as well as special provisions and plan notes) are being adhered to during construction. Once signed, the ECT is returned to OES for filing purposes. The latest signed ECT needs to be transmitted by the Environmental Analyst to the Construction Engineer to ensure that the latest ECT is available when the project is closed and it is signed as part of final activities.

ADDITIONAL GUIDANCE

The following discussions offer additional guidance for the development of the ECT:

- No Commitments: If a section does not have a commitment, list "None" in the first row. If all sections have no commitments, then a review of the ECT by all Environmental SMEs is not required. The Environmental Analyst may be responsible for all reviews.
- > Changes to the ECT for Federal-aid Project: If an environmental commitment changes on a federal aid project, Environmental Analyst will need to account for the change with a Reevaluation before the next project milestone.

- Multiple PI numbers: For environmental documents that include multiple PI numbers, the Environmental Analyst must use the ECT template with a column to list the relevant PI number for each item listed in the ECT.
- > Use of Dittos: Dittos (") should be used to indicate that the information in the cell above applies to the cell below showing a ditto. The dittos allow the Environmental Analyst to avoid repeating information in certain columns, such as the "Status" column and the "correct on the plans and the ERIT" column. The dittos help reduce distracting text and improve the readability of the ECT.
- > Do Not Use Strikethrough Text: As discussed, the latest version of the ECT will not include the use of any strikethrough text. Section G may be used to document any prior commitment that is no longer applicable to the project.
- Something Not Correctly Shown on the Plans or the ERIT: If an Environmental Analyst or an Environmental SME reviews the plans or the ERIT and determines something from Section F is not correctly shown, it is acceptable to indicate "No" on the ECT and allow the ECT to advance—except for Certification for Let. At certification for let, the right-hand column of Section F must indicate "Yes" everything is correctly shown.
- > Archaeology Sites: Due to concerns with archaeology looting, commitments related to archaeology resources must not be identified as related to archaeology in Section F of the ECT, the ERIT, or the plans. Areas identified by archaeologists for protection are described in general terms such as "Resources" or "Environmentally Sensitive Areas." The Environmental Analyst must avoid any reference to "archaeology" when describing these resources in the ECT.
- > UST / Hazardous Waste Commitments: The Phase II Environmental Site Assessment, approved by GDOT's Office of Materials and Testing (OMAT), may include construction requirements within or adjacent to areas of soil contamination. The ECT references these requirements by summarizing these affected parcels on a row in Section F and including corresponding details in the ERIT and the General Notes of the project plans. This commitment serves to ensure the PM coordinates with design and OMAT to fulfill these requirements. If the plans do not adequately list these requirements, the Environmental Analyst should contact the PM and design to add these requirements to the plans. The expectation is that the ERIT lists the affected parcels and includes the OMAT requirements. The General Notes section should also list these parcels and requirements. The plan sheets should include a cross-reference on each affected parcel to refer to the General Notes.
- > See Environmental Commitments Table Example and Common Issues reference:

ECT Example and Common Issues, GDOT Office of Environmental Services

Guidebook Revision History

Revision Description	Relevant Sections	Revision Date
Initial Publication	All	12/12/2024