



Environmental Best Practices

Leading Indicators & Mitigating Actions

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Avoiding Changes to NEPA Documents



Project footprint / description incomplete

- Utility connections, site access, laydown areas, geotechnical borings, utility locating (pot-holing)
- If not included, supplemental NEPA needed during project execution

NEPA initiated too late for field survey windows

- Delays process on front end and put pressure on back end

Impacts of mitigation/conservation actions not reviewed by full team

- Constructability and cost impacts
- Overly restrictive measures increase cost and duration of project
- What is “required” vs. “nice to have”?



Mitigating an Incomplete RFP



Regulatory consultations/approvals not yet complete!

RFP doesn't clearly cover all NEPA constraints/actions

- Determine WHO'S RESPONSIBLE (Gov't or D/B Contractor) for each action
- Permit Record of Decision (aka PROD) managed DM (*Part 3 & Part 6*)
- Are LONG LEAD CONSTRAINTS clearly identified

Entire project footprint not within NEPA boundary

- Consider Temporary work area, site access, laydown, utility connections
- *If conflict, call NEPA planner immediately to amend NEPA document*

Is Government team set for follow-on contract actions

- biological or archeological monitoring



Avoiding Bid Development Pitfalls



Long lead/constraints missed in Contractor's Proposal

TYPICAL EXAMPLES:

- **Waterways / Army Corps of Engineers Permit**
 - Nationwide Permit (6 mo) or Individual Permit (12 mo)
- **Data recovery of cultural resources (3-4 mo)**
- **Seasonal restrictions**
 - Breeding, Blooming & Weather
 - May require no work or extra measures in certain timeframes

Environmental scope missed in Contractor's Bid

- **Allow enough time to prepare submittals for regulatory agencies**
- **Means & Methods**
 - "Keep in the NEPA box" OR NEPA box not technically feasible
- **Temporary controls (fencing, noise barriers, vegetation restoration)**



Avoiding Project Execution Issues



Contractor doesn't have qualified Enviro. Manager

- Relevant work experience critical for success

Early coordination not held with all stakeholders

- Clarify all expectation and constraints
- Agree to plan for addressing unforeseen conditions
- Environmental team review baseline schedule

Environmental constraints not considered in design

Controls and avoidance measures not implemented

- Non-compliance can stop a project

If supplemental NEPA required, engage NEPA planner immediately & provide clear project description and footprint