



Preliminary Review and Early Coordination

Reference Guide Sections 4.2 and 4.3



Preliminary Review and Early Coordination

(Reference Guide Sections 4.2 and 4.3)

Overview

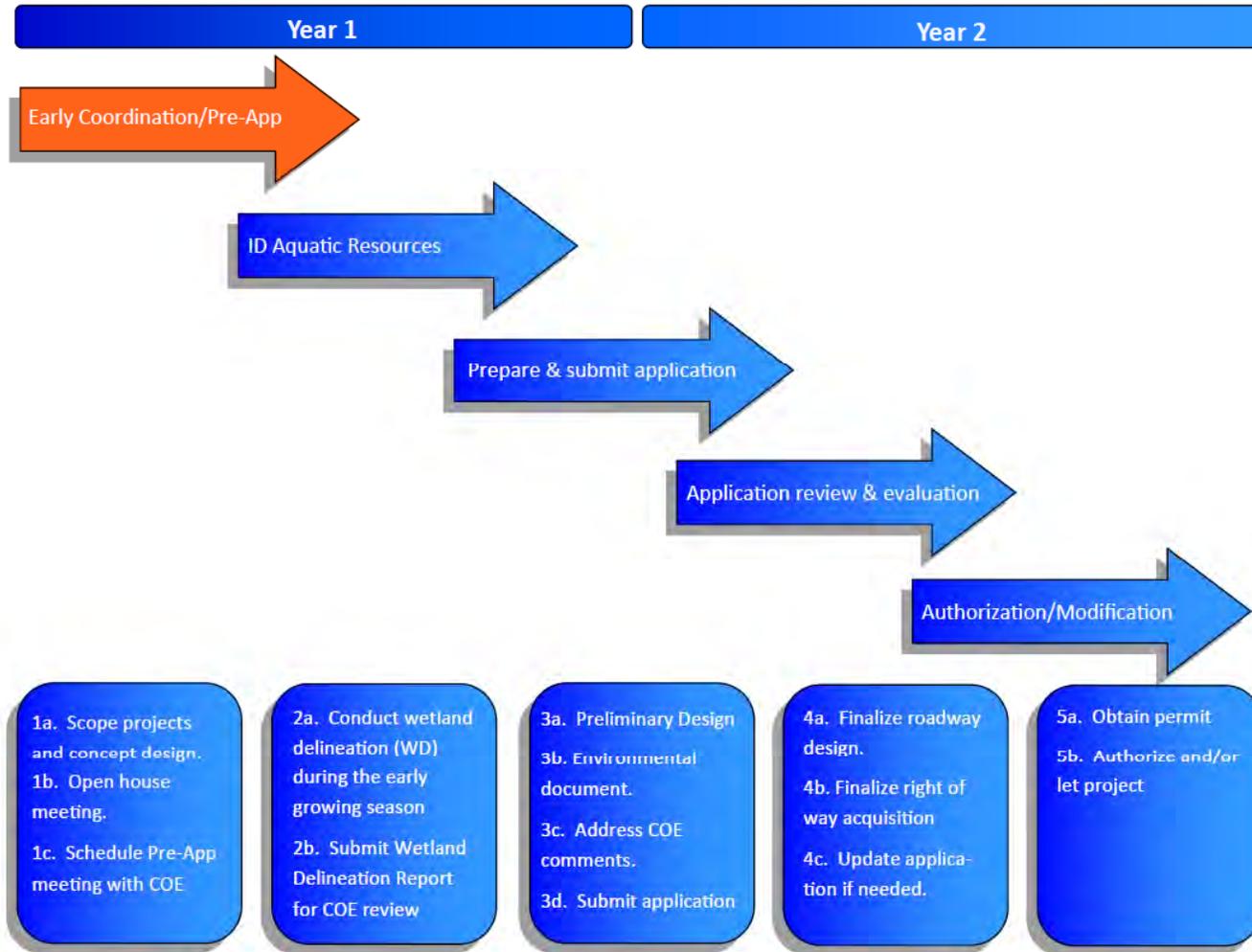
Preliminary Review

Preliminary Review Application

Early Coordination

Summary

Example Project Schedule for Water Resources Permitting





Preliminary Review and Early Coordination

Preliminary review and early coordination are undertaken in advance of preparing and submitting a permit application.

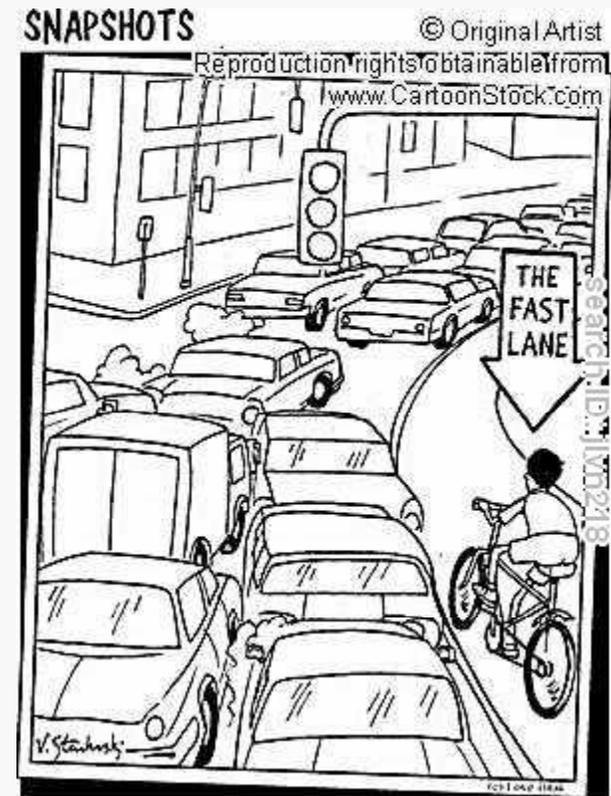
The purposes are to:

- determine who has jurisdiction and what will be regulated
- identify additional information that may be needed
- identify potential issues associated with review of the proposed project

Preliminary Review and Early Coordination

Why is it necessary?

The majority of the issues that prolong application review timeframes could easily be addressed and subsequent delays avoided if preliminary review and early coordination techniques were utilized.



Preliminary Review and Early Coordination

Preliminary Review

An in-office internal review of available information to assess the level of level of effort that will be required to obtain permits.

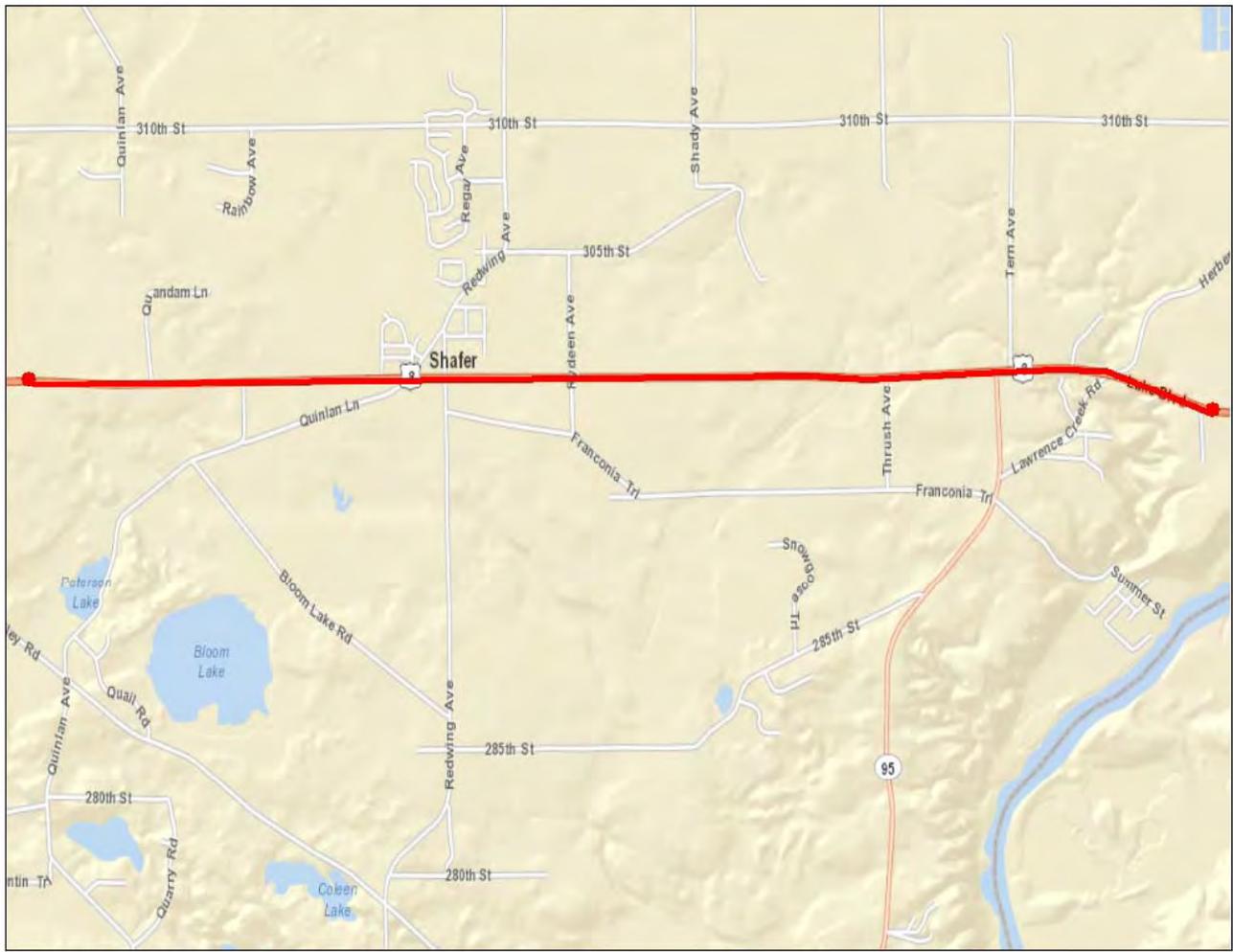
Addresses more than wetlands – tributaries, bridges, threatened and endangered species, impaired waters etc.

Identification of issues/factors that will require further efforts to resolve.

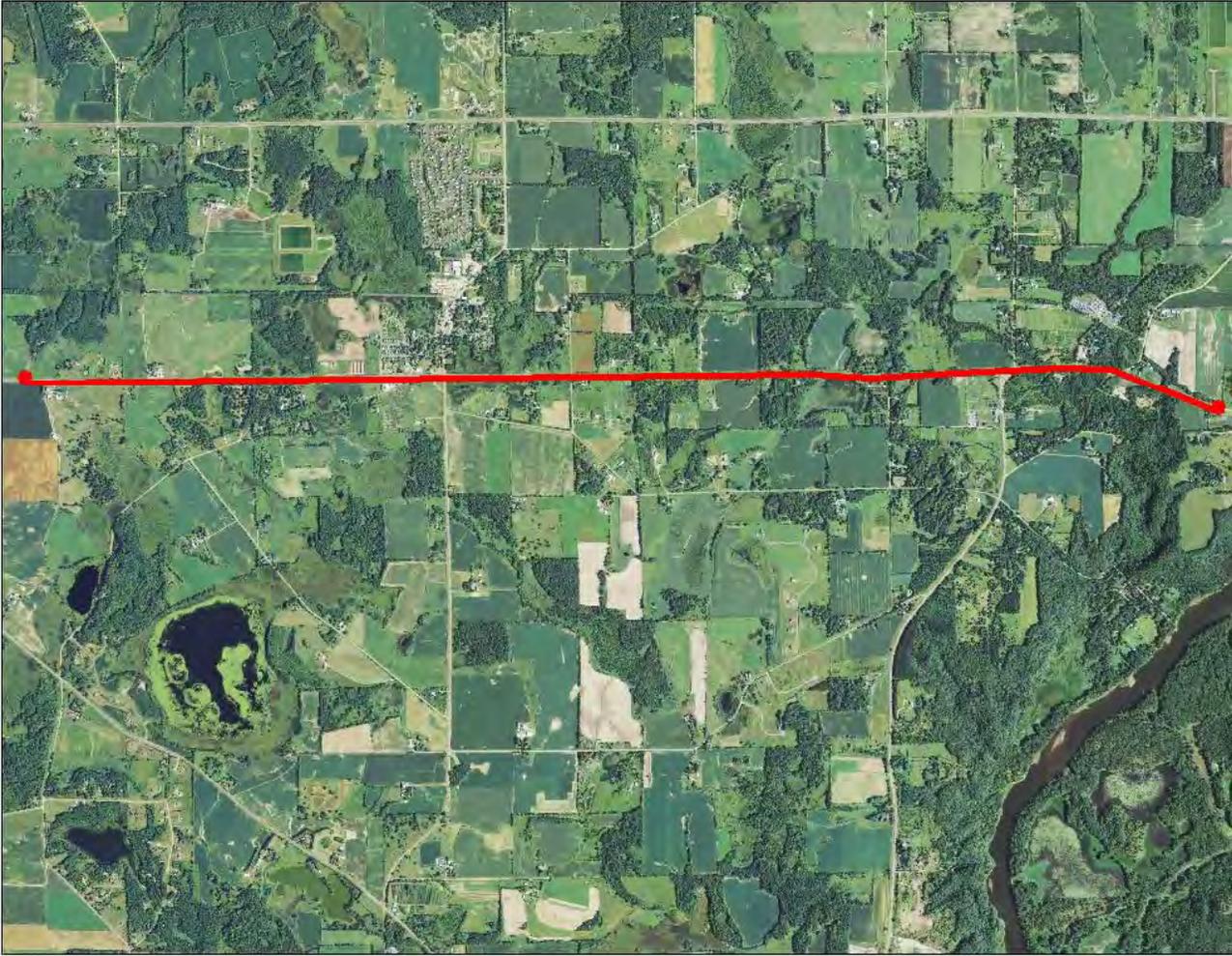
Preliminary Review and Early Coordination

Sources of Information for a Preliminary Review

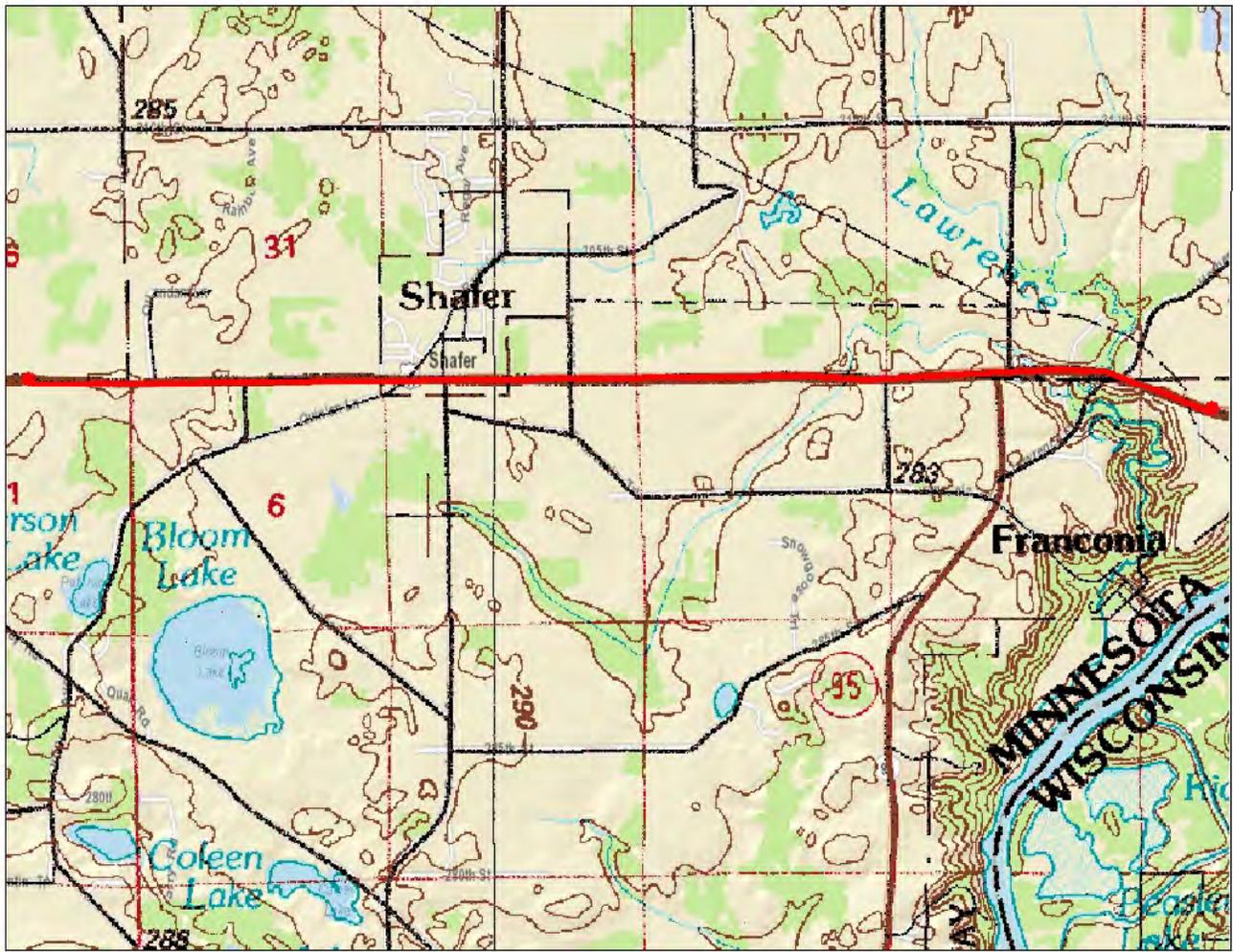
- National Wetland Inventory Maps
- Web soil survey or county soil survey
- DNR Public Waters Inventory
- National Hydrography Data (NHD)
- USGS Topographic maps
- Air photographs (current and historical)
- MnDOT Bridge Inventory
- County Biological Survey

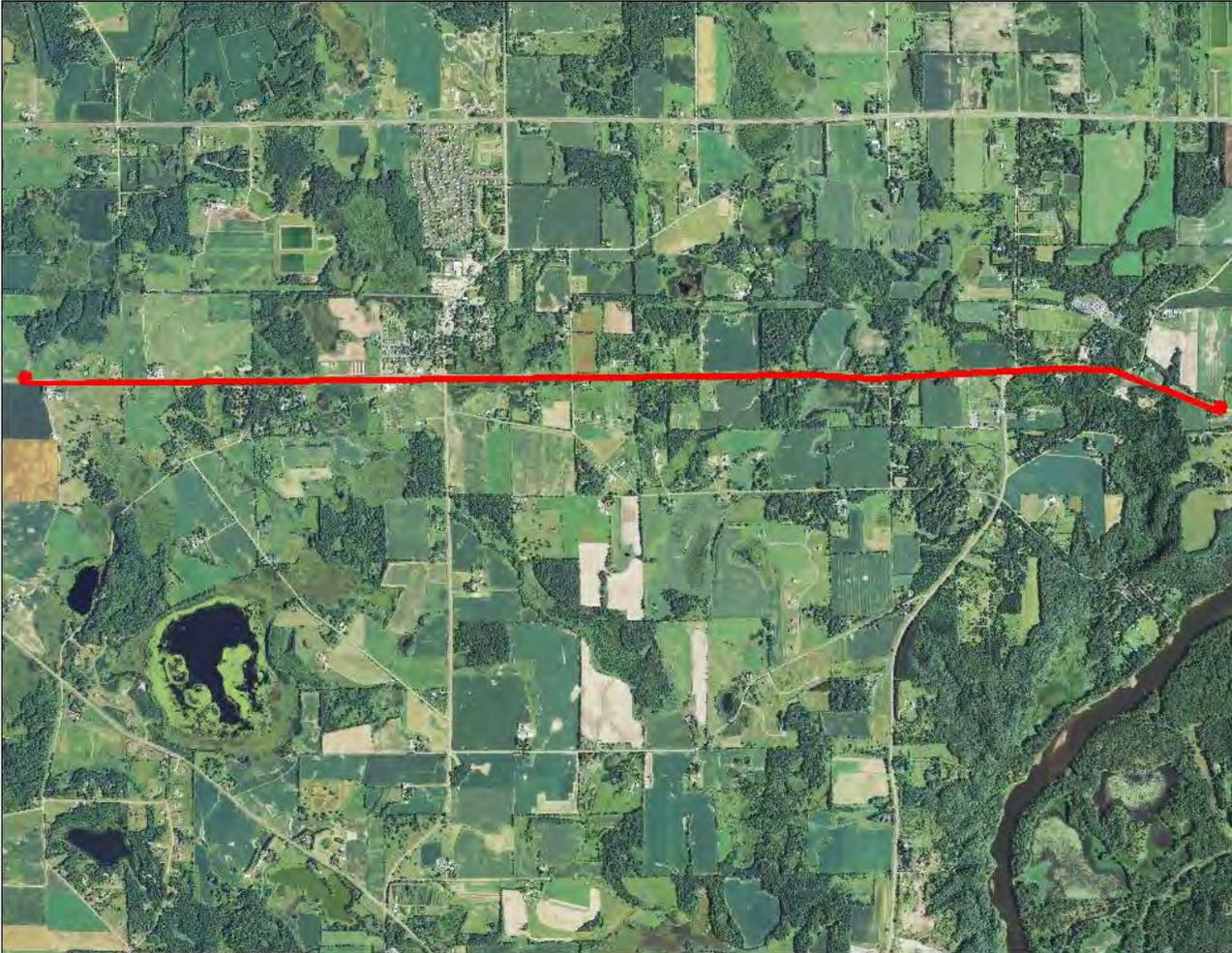


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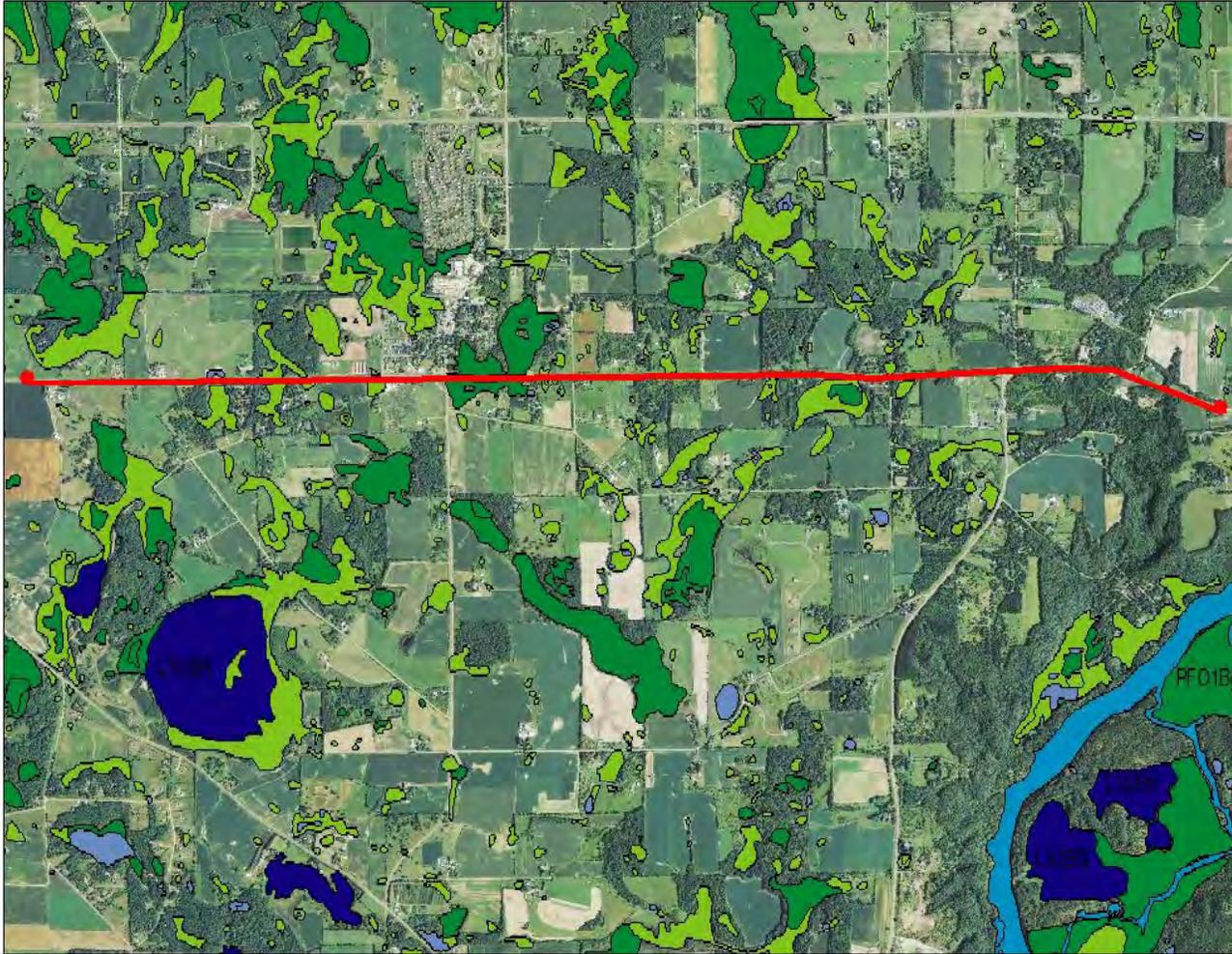


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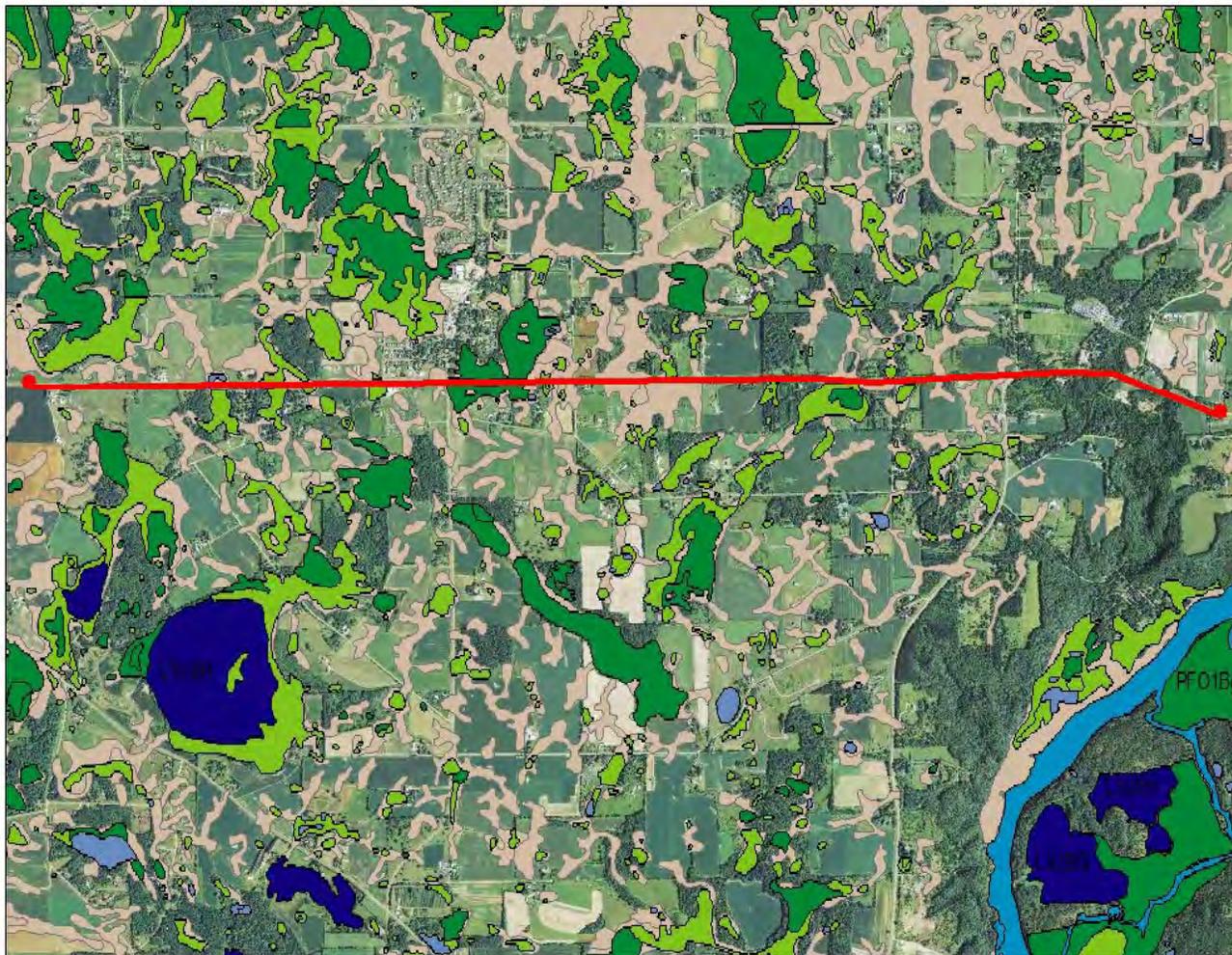




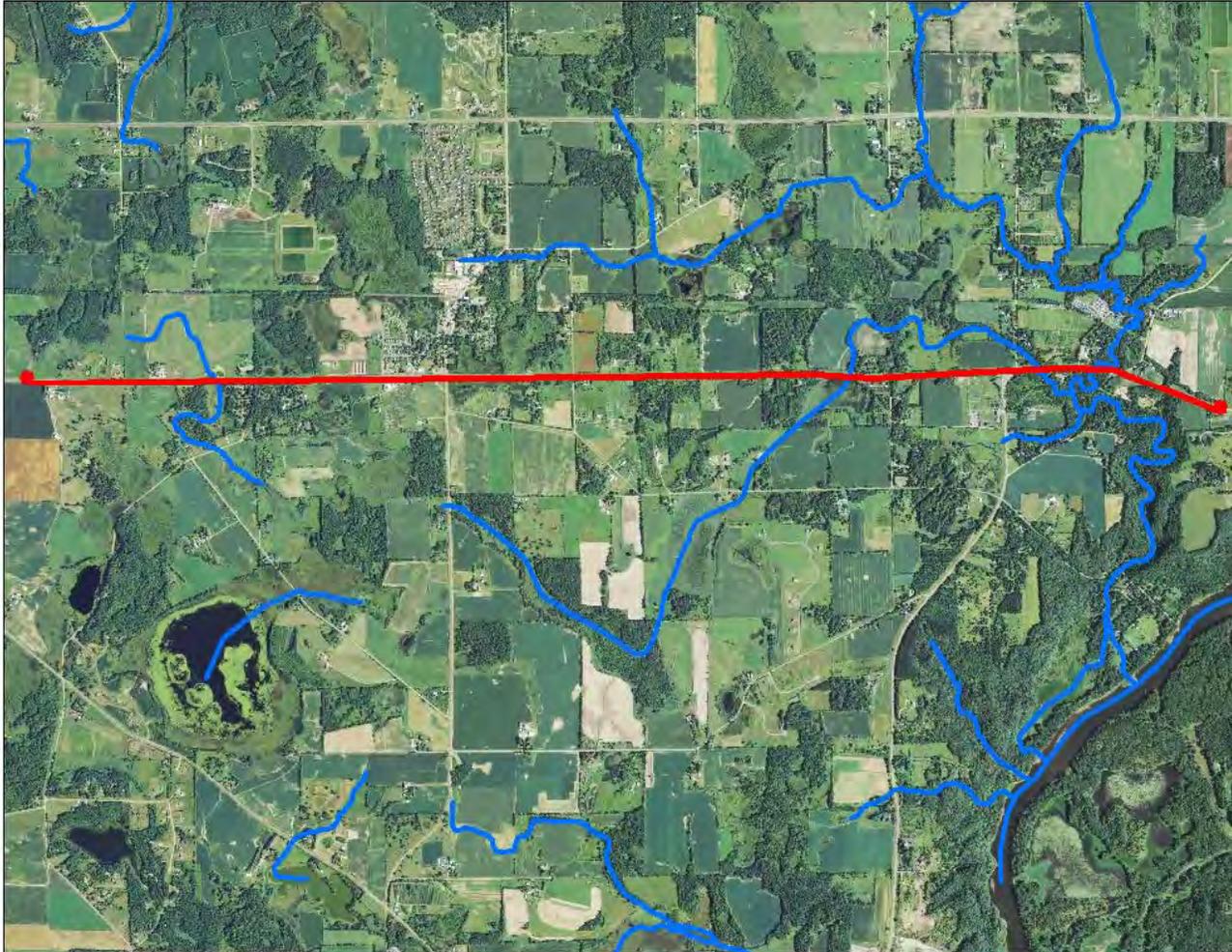
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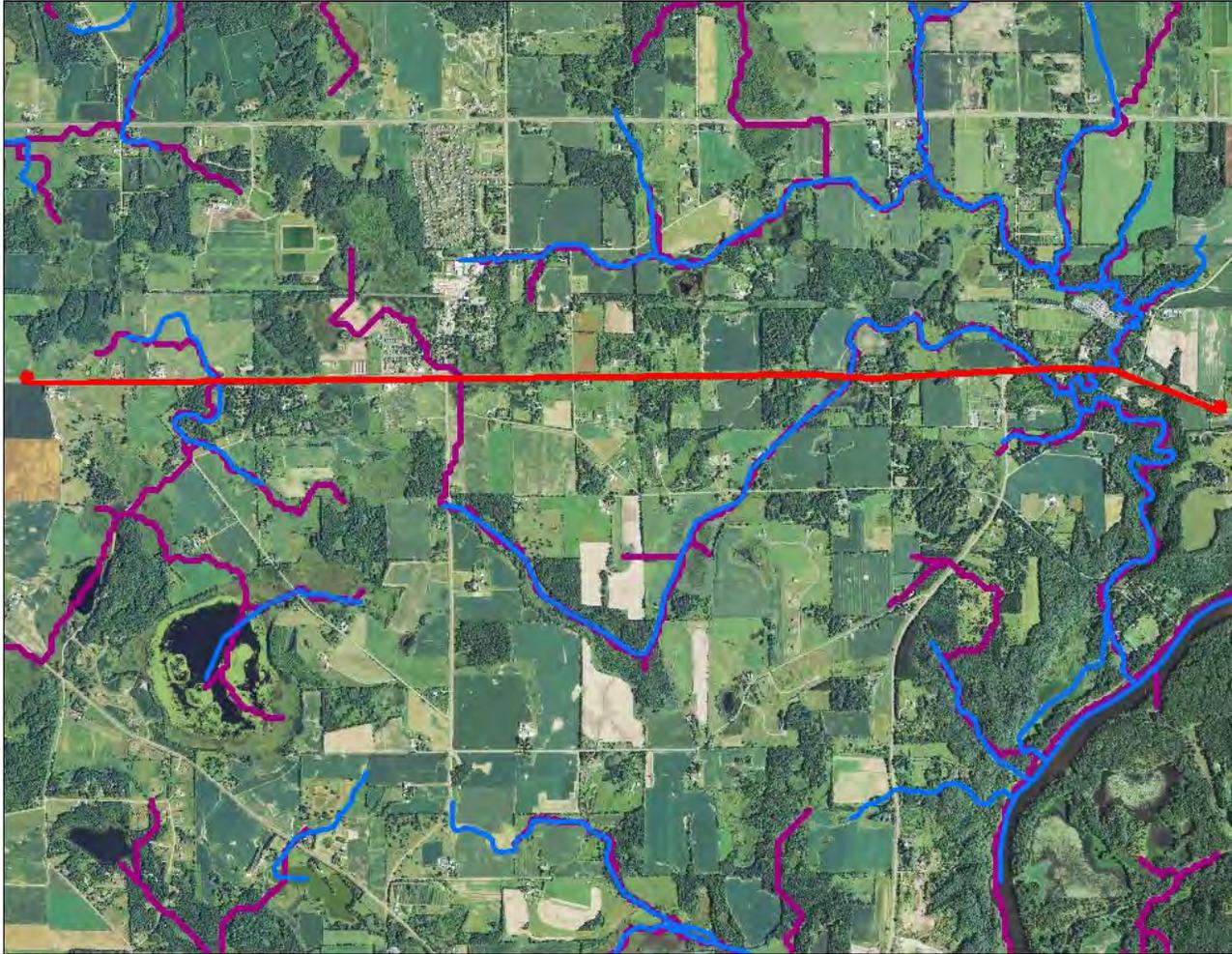
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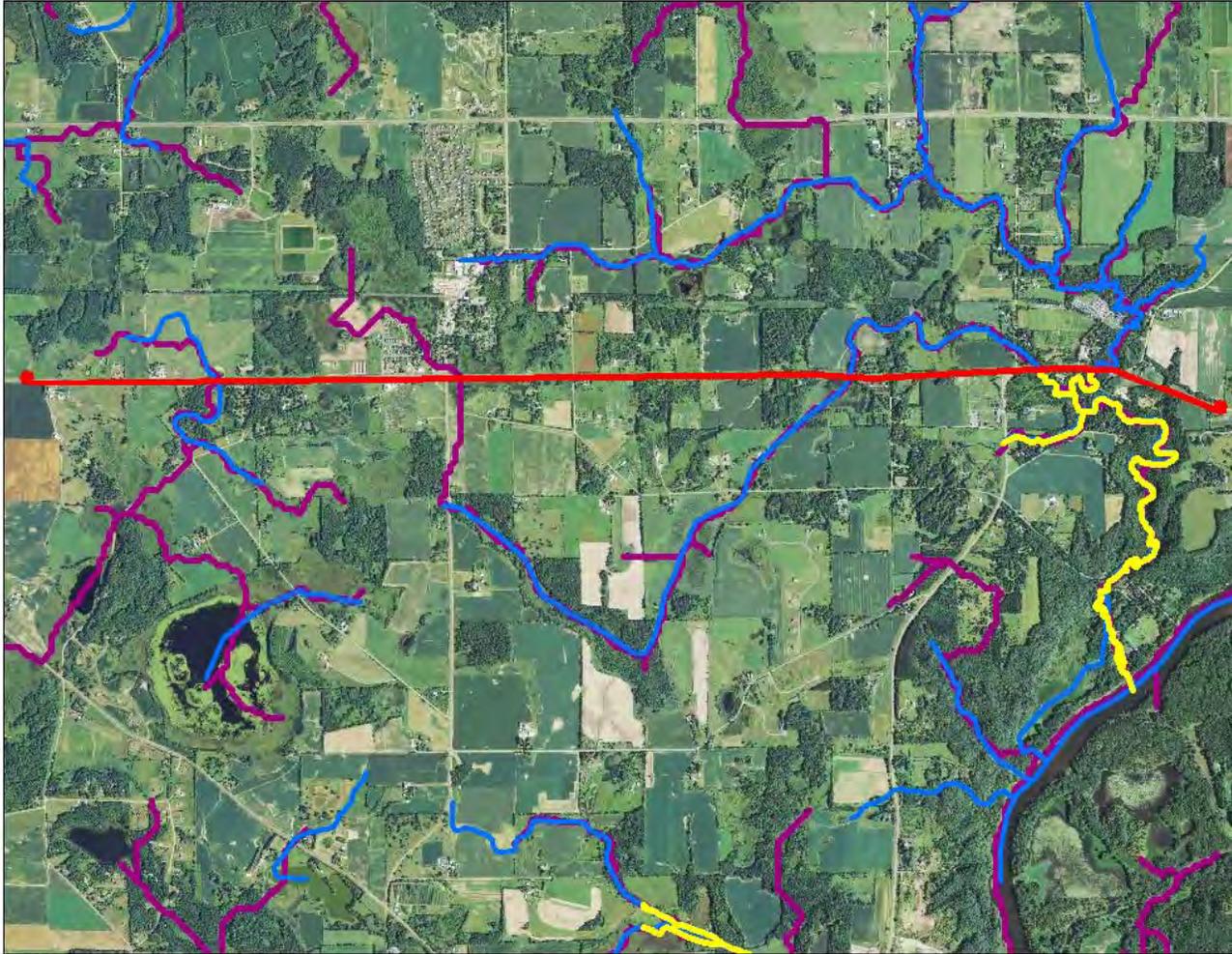
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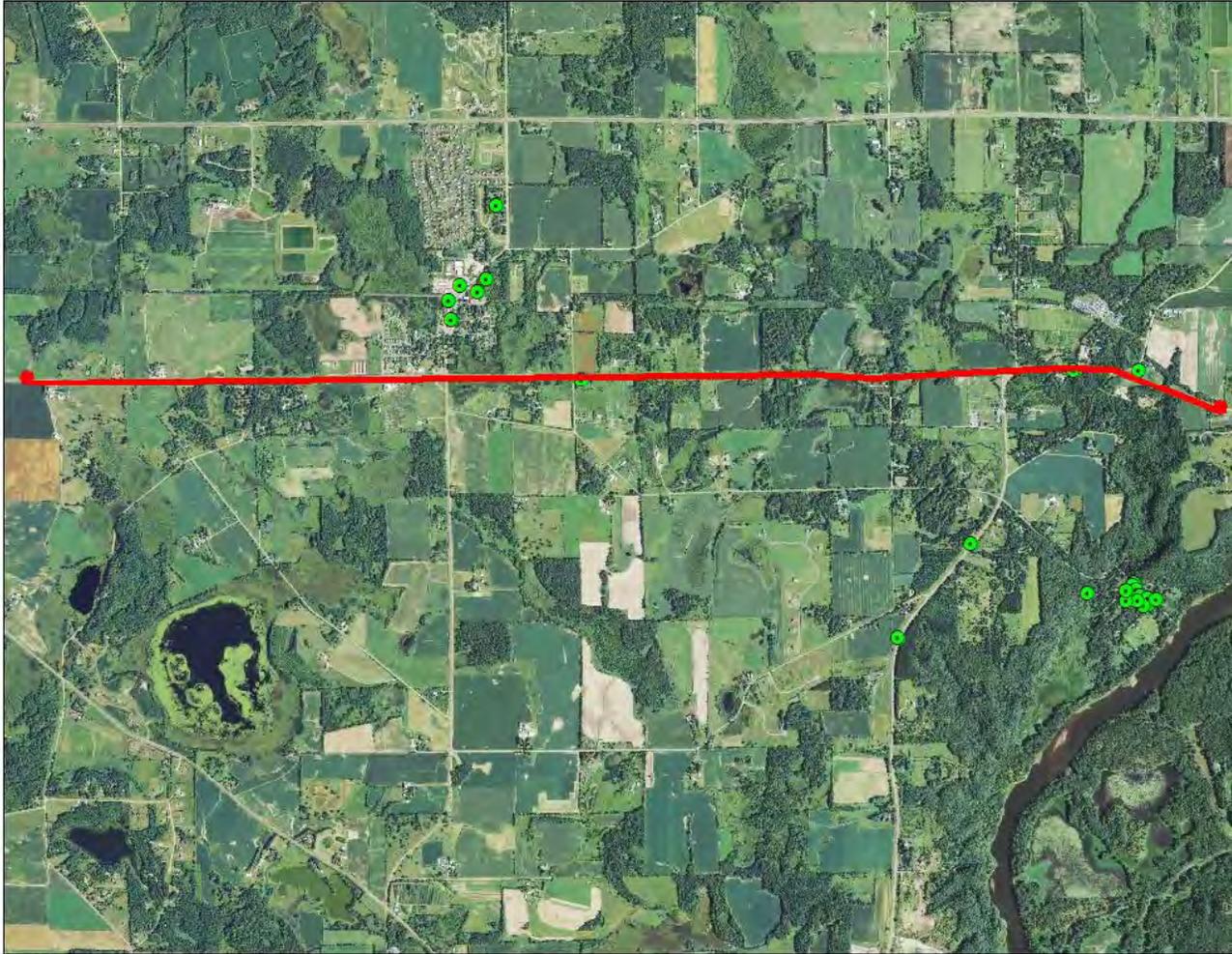
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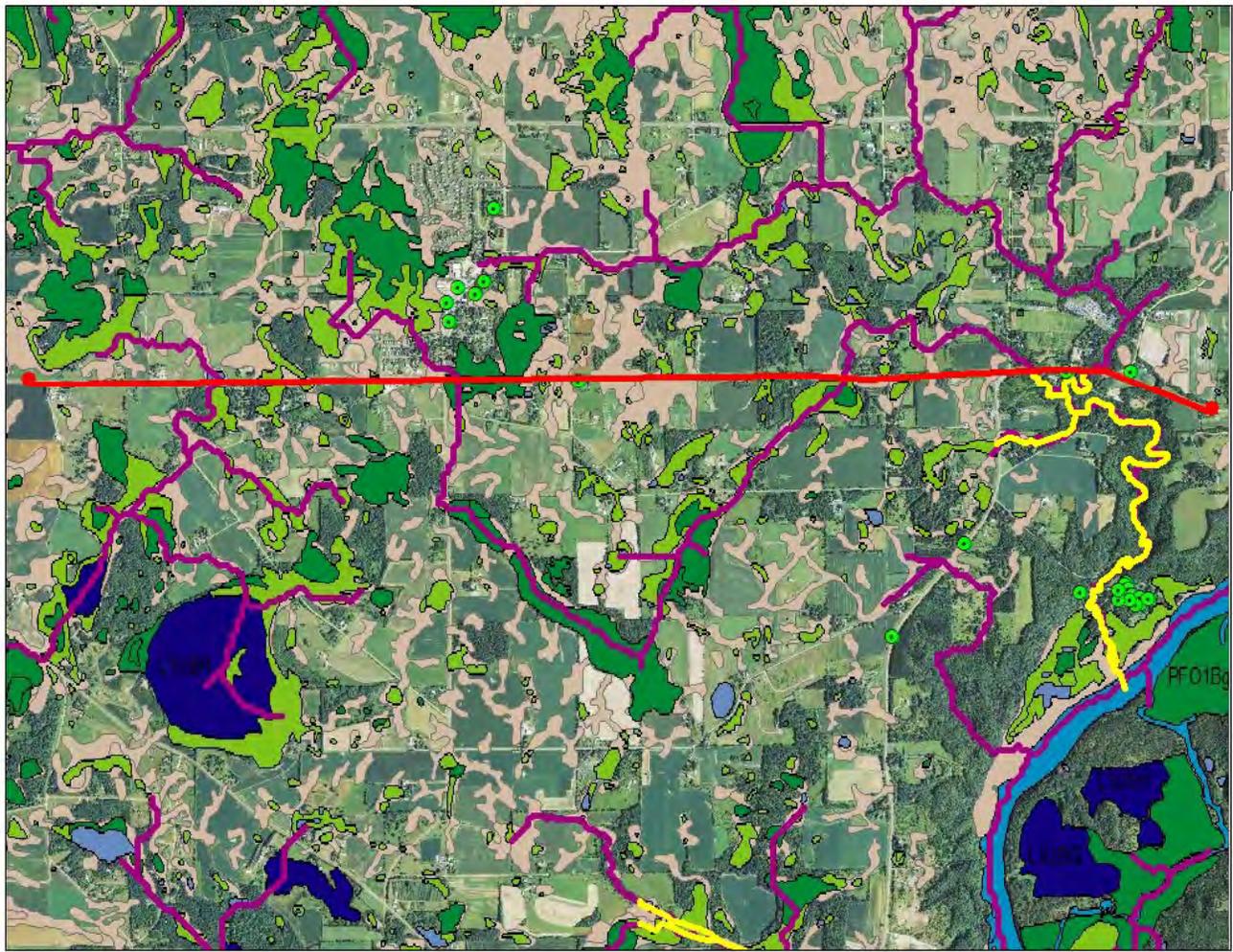
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Preliminary Review and Early Coordination

Historic Properties

The National Historic Preservation Act (NHPA) requires the Corps to consider potential effects on historic properties and allow the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on the Corps' findings before making a permit decision.

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Historic Properties

To identify areas which may need further evaluation check:

- information on known resources that may be affected
- areas of high probability where archaeological survey may be required
- or structures/buildings older than 50 years in or adjacent to the project area

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Historic Properties

If your project involves a bridge on the list of “Historic Bridges in Minnesota”, the following considerations should be addressed as soon as possible in the planning process.

- Are there practicable alternatives to bridge replacement that meet the project purpose including rehabilitation of the historic bridge?
- Plan to involve the public and specifically address the project’s effect on the historic property.

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Historic Properties

If there are buildings/structures older than 50 years in or adjacent to your project corridor, the following considerations should be addressed as soon as possible in the planning process.

- Does the proposed work involve changes that would result in a noticeable change to the current setting for buildings/structures?
- If yes, then consider documenting the setting using photographs prior to meeting with the agencies.

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Historic Properties

Other indicators we look for in the screening of projects for their potential to effect historic properties include:

- within 500 feet of a river or lake
- on a prominent landform
- a valley bluff line
- large wetland complex
- near the junction of rivers or outlets/inlets to lakes

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Early Coordination

A discussion and information exchange between the applicant and the regulatory agencies prior to submission of a permit application.

The Corps refers to this as pre-application consultation (33 CFR 325.1(b))

Preliminary Review and Early Coordination

Early Coordination

Early coordination benefits both the applicant and the regulatory agency

Applicant: identification of important factors in the review process, anticipated level of review, potential avoidance and minimization measures , necessary elements for a complete application.

Agency: gain familiarity with project, anticipate future workload, identification of important factors in the review process, manage expectations.

Preliminary Review and Early Coordination

How Important is Early Coordination?



Overall Size of Project

small

medium

large

Aquatic Resource Impacts

< 1/2 acre

1/2 to 5 acres

> 5 acres



Preliminary Review and Early Coordination

Making Early Coordination Work

Permitting should be integrated into the planning and design of the project and not treated as a separate process (parallel process vs. series)

Early coordination can be accomplished on a project-specific basis or on a programmatic basis



Preliminary Review and Early Coordination

The Federal Highway Administration (FHWA) is also looking to the early coordination process as a means to determine eligibility for a programmatic categorical exclusion per their agreement with MnDOT.

The information required for this determination is the same information that would be provided to the permitting agencies as part of early coordination.

Preliminary Review and Early Coordination

Making Early Coordination Work

All of the permitting agencies (Corps, MNDNR, and WCA LGUs) fully support establishing an annual meeting between the road authority and the agencies to discuss upcoming projects.

Discuss what is coming up in the near and distant future and get updates on in-progress reviews.





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Summary

Preliminary review and early coordination benefit everyone involved in the permitting process.

Put your project on the permitting agency's radar.

Discuss informational needs and analyses in advance of the application submittal.

Build relationships.