600.01 Construction Overview

After the design phase, a project should have a complete set of environmental documentation, permits, and approvals, in addition to a final set of plans, specifications, and estimates (see Chapters 400 and 500). At this time, the project is publicly advertised and WSDOT accepts bids for completion of the work. The contract is awarded and construction begins soon after. Exhibit 600-1 illustrates the relationship between the preceding and succeeding phases in relation to construction.

Because the contractor is responsible for implementing a substantial amount of environmental commitments WSDOT made during project development, it is crucial to review all environmental documents and permits to ensure contractor relevant permit requirements make it into the contract (see Chapter 590).

Chapters 610, 620, and 630 lead to the implementation of commitments during construction. Consistent implementation of commitments is necessary to achieve accountability during construction that leads to good relationships with the public, agencies, and Indian tribes.
600.02 Roles and Responsibilities

WSDOT builds trust and fosters positive relationships with the regulatory agencies, tribes, and the public by implementing the following roles and responsibilities during construction. Some of the tasks may be done by staff other than those identified below depending on how each region or mode is structured.

600.02(1) WSDOT Region/Mode Environmental Manager (REM)

- Make sure environmental staff are trained to ensure compliance.
- Establish clear expectations for environmental staff.
- Ensure staff and project offices have the necessary equipment to ensure compliance with permit requirements.
- Foster good communication with regulatory agencies and the construction team.
- Implement the Environmental Compliance Assurance Procedure (ECAP).
- Work closely with the project engineer to resolve issues as they arise.
- Ensure violations are documented in the Commitment Tracking System (CTS) (RCW 47.85.040(3)).
- Document and share lessons learned to prevent recurring issues.

600.02(2) WSDOT Construction Project Engineer (PE)

- Discuss environmental topics at the preconstruction meeting and review the environmental contract provisions (RCW 47.85.030(2))
- Establish compliance expectations for the contractor and their subcontractors.
- Stop the contractor when their work violates the contract provisions or environmental requirements and notify the REM and construction engineer (RCW 47.85.030(4)).
- Ensure the contractor's Spill Prevention, Control, and Countermeasures (SPCC) Plan (and other plans) meets WSDOT's requirements before accepting it.
- Establish compliance expectations of the contractor related to permit required discharge sampling, monthly data reporting, and BMP adaptive management.
- Communicate with the REM as needed.
- Check with environmental staff about proposed design changes and change orders to make sure it is permitted.
- Implement ECAP when it is triggered.
- The WSDOT Project Engineer is responsible for managing the contract in accordance with the Construction Manual M 41-01.
600.02(3)  **WSDOT Environmental Coordinator and/or Project Office Inspector**

- Review all environmental commitments for the project.
- Determine water quality monitoring requirements for the project if in-water work will occur and develop a strategy or plan to ensure compliance.
- Make sure the project exists within CTS.
- Provide advance notifications to regulatory agencies to ensure compliance with environmental requirements.
- Attend the preconstruction meeting and participate in discussing environmental requirements.
- Review the contractor’s SPCC Plan and forward any concerns to the PE.
- Ensure the contractor creates and maintains a Site Log Book to comply with the CSWGP.
- Ensure the contractor installs high visibility fencing (HVF) to protect sensitive areas as a first order of work in accordance with the Plans and *Standard Specifications*.
- Ensure the contractor installs and maintains all best management practices in accordance with their Temporary Erosion and Sediment Control Plan and the CSWGP.
- Ensure the contractor's Erosion and Sediment Control (ESC) Lead submits erosion control inspection reports by the end of next working day following their inspection.
- Conduct site visits to verify that the contractor’s ESC Lead’s inspections are adequate and to ensure issues are resolved.
- Review design modifications and change orders to ensure they comply with environmental requirements.
- Meet with regulatory agency staff when they visit the project site to document their concerns or recommendations.
- Notify the PE when the project is not in compliance – initiate ECAP as necessary.
- Ensures the contractor samples site discharges as required per the CSWGP. Coordinators can receive automatic email notifications via Ecology's WebDMR system whenever the contractor submits data.
- Sample water quality as required per in water work related permits and make sure any in water work samples are sent to the Ecology federal permit lead.
- Request permit modifications if the project footprint increases, impacts to environmental resources change, or work means and methods may violate environmental requirements.

600.02(4)  **WSDOT Environmental Technical Experts (Regions, Modes, and Headquarters)**

- Verify environmentally sensitive areas in the field that need to be protected
- Review SPCC Plans and provide comments to the PE
- Review temporary stream diversion plans prepared by the contractor
- Install fish exclusion best management practices and remove fish from isolated areas prior to work
- Monitor noise during nighttime work
- Monitor for cultural and archaeological resources
- Monitor for marine mammals
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600.02(5)  **Regulatory Agencies**
- Provide technical and regulatory guidance.
- Review project changes and issue modifications to permits or approvals if necessary.
- Conduct site visits during construction to verify compliance.
- Communicates concerns if compliance is not achieved and corrections are needed.

600.02(6)  **WSDOT Environmental Services Office (Headquarters)**
- Track noncompliance events to look for trends and to identify lessons learned.
- Ensure the regions/modes record violations in CTS.
- Communicate regulatory changes and lessons learned to the regions/modes.
- Develop and maintain environmental compliance construction procedures.
- Provide environmental compliance training.
- Submit annual violation report to the Washington State Legislature and Department of Ecology.

600.03  **Construction Compliance Expectations**
Secretary's Executive Order *E 1018 Environmental Policy Statement* states that all employees need to be familiar with and adhere to all environmental commitments, policies, and procedures applicable to their activities. WSDOT employees take a role in ensuring that the contractor's work is compliant with the environmental documents and permits by incorporating environmental permits into contract documents, monitoring for compliance during construction, enforcing the contract, and taking other measures described in these chapters.

600.04  **Procedures for Construction**
The following chapters identify policies and procedures to ensure environmental compliance during construction. Chapter 610 focuses on preparing for construction. This includes all activities leading up to the contractor physically disturbing soil on the project. Chapter 620 summarizes specific environmental requirements during construction for each element of the environment (i.e., earth, air, noise, water). Chapter 630 describes policies and procedures for closing out environmental commitments prior to project completion.

600.05  **Abbreviations and Acronyms**
- CESCL: Certified Erosion and Sediment Control Lead
- NEPA: National Environmental Policy Act
- SEPA: State Environmental Policy Act
- TESC: Temporary Erosion and Sediment Control
600.06 Glossary

These definitions provided context to achieving environmental compliance for Chapters 600, 610, 620, and 630. Some terms may have other meanings in a different context.

Commitment – An obligation that WSDOT makes within an environmental document or agreement for the project; or an expectation imposed upon WSDOT by another agency through a permit or approval for the project. Commitments can be either the agency’s or contractor’s responsibility to implement.

Commitment Status – The status of commitments (opened, closed, cancelled, etc.) in the WSDOT Commitment Tracking System.

Commitment Tracking System – The Commitment Tracking System is a database that allows you to store commitments in a secure computer network server, plus manage the responsibility (WSDOT or contractor) and implementation method (guidance document or contract) for the commitment. It also allows you to store compliance records, document the status, and report details about commitments from their inception through project delivery and on to maintenance.

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