

OM-06: Environmental Commitments Tracking System

1-15 points

Goal: Ensure that environmental commitments made during project development related to operations and maintenance are documented, tracked, and fulfilled.

Sustainability Linkage

Tracking commitments supports the environmental and social principles by ensuring that adherence to commitments made to stakeholders and the environment are consistently met throughout project development.



Background and Scoring Requirements

Background

Scoring Requirements OM-06.2 through OM-06.5 are intended to allow for scalability in the type and detail-level of Environmental Compliance Tracking System (ECTS), from processes to disseminate information, to forms that are passed through part or all of a project's lifecycle, to a formal database driven ECTS.

For the purposes of this criterion, the following definitions apply:

- **“Commitments”** – Any agreed-upon obligations to avoid, minimize, or compensate for a social, economic, or environmental impacts resulting from planning activities, an environmental review process such as NEPA, design efforts, or permitting.
- **“Compliance”** – Conforming to environmental laws, regulations, standards, and other requirements such as permits to operate and/or maintain a project or facility.
- **“Environmental Mitigation”** – Environmental Mitigation activities means strategies, policies, programs, actions, and activities that, over time, will serve to avoid, minimize, or compensate for (by replacing or providing substitute resources) the impacts to, or disruption of, elements of the human and natural environment associated with the implementation of a transportation project, plan, or system. Examples of the human and natural environment include neighborhoods and communities, homes and businesses, cultural resources, parks and recreation areas, wetlands and water sources, forested and other natural areas, agricultural areas, endangered and threatened species, and the ambient air.

Scoring Requirements

Requirement OM-06.1

2 points. Develop a Comprehensive Environmental Compliance Tracking System

Develop and use a comprehensive ECTS that ensures that commitments made during project development are tracked, fulfilled, and verified throughout operations & maintenance activities. In this case, a system could include a wide range of solutions from project worksheets to detailed databases. Points are achieved by incorporating all regulatory and non-regulatory commitments that apply to the development work and additional properties, which may include items such as the following:

- Stormwater management facilities
- Wetland restoration areas

- Stream restoration areas
- Reforestation areas
- Sound walls
- Wildlife crossing structures
- Surveys
- Borings
- Batch plants
- Staging
- Equipment storage
- Employee parking, and field offices; and land that is purchased, leased, occupied, or used for the work.

Requirement OM-06.2

1-5 points. Integrate Key Functions of an ECTS

At a minimum, the ECTS should identify commitments in a single list, identify environmental compliance manager(s), and be updated and maintained as projects are constructed and throughout any monitoring period.

Scoring is based on the following, cumulative requirements:

- **Requirement OM-06.2a**
1 point. Communicate from Planning through Operations & Maintenance
 Ensure that environmental commitments are communicated from project development (including project planning, design, and construction) to operations & maintenance.
- **Requirement OM-06.2b**
1 point. Leverage Tracking Mechanisms
 Leverage tracking mechanisms (such as databases, forms, or lists).
- **Requirement OM-06.2c**
1 point. Identify Training Needs
 Identify periodic training needed for necessary maintenance and operations staff.
- **Requirement OM-06.2d**
1 point. Provide Reports
 Provide periodic reports verifying the commitments have been fulfilled.
- **Requirement OM-06.2e**
1 point. Establish Quantifiable Performance Metrics
 Establish quantifiable performance metrics for the environmental commitment tracking system. These can either be assigned to individual roadways and bridges or the aggregated network.

Requirement OM-06.3

2 points. Require Use of ECTS

The agency has official policies and procedures in place that require use of the ECTS by project development, construction, and maintenance and operations staff.

Requirement OM-06.4

2 points. GIS-based ECTS

The agency has an ECTS that is GIS-based and on a platform consistent with the agency's planning, asset management, and maintenance systems, if applicable.

Requirement OM-06.5

2 or 4 points. Measure Progress and Monitor Performance

To earn credit for this scoring requirement, the agency must have a CISP as described in scoring requirement OM-06.1. Use established quantifiable performance metrics for the environmental commitment tracking system (assigned to individual roadways and bridges or the aggregated network) to evaluate the overall performance of the environmental commitment tracking program.

Scoring is based on the following, cumulative requirements. The first requirement must be accomplished to earn the second.

- **Requirement OM-06.5a**

2 points. Set Goals

Set goals for compliance with environmental commitments and set a time frame in which these goals should be achieved.

- **Requirement OM-06.5b**

2 additional points. Measure Performance and Demonstrate Sustainable Outcomes

Use the environmental commitment tracking system that was set up to measure performance and track progress toward these goals for at least one year. Show that progress has been made toward the stated goals.

Resources

None referenced.

Scoring Sources

The program is considered to have met this criterion if the requirements above can be reasonably substantiated through the existence of one or more of the following documentation sources (or equal where not available):

1. Copies of the databases, forms, lists, and hold points used for environmental commitment tracking.
2. If performance is measured, a chart, table, or spreadsheet that summarizes system performance.
3. If progress is monitored, a chart, table, or spreadsheet progression towards the above goal over time.