



CONSTRUCTION BULLETIN

Division of Environmental
Justice & Equity Services

2025 Number 2, Page 1 of 2
Date: February 13, 2025

Preliminary Injunction Offsite Trucking & Analysis Determination

Revision to CDOT Trucking Compliance Resource Guide 2024

The purpose of this Bulletin is to provide new guidance from a US Department of Labor (DOL) temporary [injunction](#) that applies to all CDOT construction projects, including maintenance and federally funded (FTA and FHWA) Local Agency projects. These stipulations will impact the certified payroll / Davis-Bacon and Related Acts (DBRA) requirements for offsite delivery trucking.

Timeframe

This determination is in effect starting 1/1/2025 and will remain in effect until further notice.

Key Highlights

- CDOT will NOT be enforcing payment of prevailing wages for onsite delivery time when the delivery of material is made from an offsite location, but it will still be enforcing prevailing wages for time spent performing construction onsite.
- While truckers (that have been determined to be either a supplier or a subcontractor) are delivering material on the site of work from an offsite location, de minimis tracking and certified payrolls are NOT required.
- Truck drivers that perform work (“construction, prosecution, completion, or repair”) on the site of work or those that are hauling material from one onsite location to another onsite location of the same project ARE required to pay prevailing wages and submit certified payrolls. De minimis tracking is not applicable for hauling material from an onsite location to another onsite location of the same project.
- CDOT Forms 205 and 1425 are still required to be submitted and approved in B2Gnow prior to the trucking firm starting work on the contract.
 - CDOT Form 205 will be required for truckers who will be hauling onsite to onsite and/or performing work (“construction, prosecution, completion, or repair”) on the site of work. Anytime material is being hauled off of the project solely, and nothing is being delivered to the project, a CDOT Form 205 will be required.
 - CDOT Form 1425 will be required for truckers who are delivering materials to the project from an offsite location and have a written agreement that exceeds \$10,000.



COLORADO
Department of Transportation
Office of the Chief Engineer

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Analysis

During the construction phase, project managers, consultants, and civil rights specialists shall determine the following:

1. Is each hauler coming from an onsite or offsite location? (A thorough analysis will be required in each situation to make this determination.)
2. While hauling material from an offsite location, are truckers performing any additional labor/mechanic work on the site of work (subject to DBRA) outside of trucking?

For Additional Information

- CDOT guidance [Preliminary Injunction Offsite Trucking Analysis & Determination](#)
- CDOT [Trucking Compliance Resource Guide for Preliminary Injunction \(2025\)](#)
- For questions regarding this construction bulletin, please contact the applicable region civil rights office.