

CHAPTER II - EARLY PROJECT ACTIVITIES

1.0 Purpose and Need

The Purpose and Need (P&N) statement or section is the critical foundation for a project's approval. The process of defining, evaluating, and reducing alternatives is dependent upon:

- Establishing a transportation need based on objective analysis, and
- Defining a purpose for the proposed improvements that would address the need.

Put another way, the need is the transportation problem that needs to be addressed; the purpose states why the problem should be addressed.

The P&N discussion can vary in length, but it must be detailed enough to provide clear justification for the project in the National Environmental Policy Act (NEPA) document. In addition, the P&N statement will be necessary components of other consultations, e.g., Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act.

The specific contents and depth of the P&N statement will vary by project, ranging from brief overviews of less than five pages to detailed analyses requiring more than 15 pages of documentation. The key for successful documentation is to match the depth of discussion with the overall magnitude of the project and its reasons for being proposed. Projects such as the widening of a rural highway may have a specific purpose due to mandates by the Georgia State Legislature (e.g., the Governor's Road Improvement Program [GRIP]). In such cases, the documentation will rely mostly on the background for the legislation, the reasons for it, and the needs identified in the legislation. Projects defined as safety improvements (e.g., new grade separation of an existing intersection or rail crossing) typically will have needs associated with traffic or accident conditions at a specific location. For larger-scale projects such as roadway or highway segments on new location, the full range of needs should be reviewed to help reduce the range of reasonable alternatives. In this case, the need may be a combination of capacity, safety, economic, or legislative issues.

While the needs for a project will vary, the following topics should be reviewed for their applicability (consistent with Federal Highway Administration [FHWA] Technical Advisory 6640.8A). Where appropriate, analysis and discussion of these topics should be included as subsections of the Purpose and Need statement. Generally, if analysis of a particular topic does not indicate a specific need for the project, the P&N discussion should not include that topic. For instance, if traffic projections for a rural, two-lane highway never approach capacity, the need for widening the highway would not be strengthened with a discussion on traffic demand.

- Project Status – Background details on the project are a key component of every Purpose and Need statement. The discussion should include project history, actions taken by other agencies, recommended schedules, and any pending actions.

- System Linkage – The project should be placed in context for the reader within the surrounding transportation system. It may be part of a longer series of projects with separate NEPA studies, or an important link to existing facilities. Often, this discussion will correlate closely with legislation, so the text may be combined to cover both topics.
- Capacity – Where traffic is a concern, the project’s need should include a discussion of existing and projected traffic volumes. Tables and/or graphics may help illustrate the traffic problem. Capacity analyses should be completed where appropriate to determine Levels of Service (LOS). (Highway Capacity Software and SYNCHRO are examples of traffic modeling software that can be used.)
- Transportation Demand – The project may be a critical component of a regional or statewide transportation plan. The project’s relationship to adopted plans should be discussed. The FHWA Technical Advisory also recommends discussing traffic forecasts in this section if they differ substantially from those derived for the adopted plans. In other words, newer or more refined data for a specific project area may demonstrate a greater traffic need than is apparent in existing transportation plans.
- Legislation – Related to the project status, legislation might be the primary reason for a project, such as the GRIP program enacted in the 1980s. Actions by the Georgia legislature or Congress could affect funding of particular projects or new safety benchmarks that would require modifications to roadway facilities.
- Social Demands or Economic Development – Changes in surrounding land uses may be the reason for growth in existing or future traffic volumes. If applicable, the discussion should address how projected economic development and land use plans will impact the capacity of the relevant roadways and/or intersections. New schools, recreational facilities, or other uses may be planned that would substantially increase the number of vehicular trips. The discussion in this section should focus on the impact to highway capacity and the resulting need for improvement. Other sections of the NEPA document will be appropriate for more detailed analysis of land use and cumulative impacts of the development activities in the vicinity.
- Modal Interrelationships – Transit and airport facilities may not apply to most Georgia Department of Transportation (GDOT) improvement projects, but the project’s relationship to other modes of transportation needs to be considered including bike and pedestrian facilities. Rural widening projects may improve access to transit, an airport, or other services in a nearby metropolitan area. An intersection or roadway modification may be coordinated with a rail crossing or new station.
- Safety – Safety concerns often are a major reason for roadway improvements. Intersections and multi-lane highways often include safety as a need. However, the local perception should be balanced with objective analysis to determine whether safety is a real issue. Accident data should be reviewed to derive and compare rates with state and county rates at similar facilities. If the results do not indicate a high accident rate, safety should not be relied upon as the project justification. If the rates are high, then summary discussion along with a table and/or graphic can help convey the severity of the accidents and the corresponding importance of the proposed improvements.

- Discussion of studies conducted during the planning process, if available.

The purpose of a project may be difficult to separate conceptually from its need, because the terms are interrelated. The description of the project's purpose is an early indication in the NEPA text of the alternatives that will follow. It may simply be a paragraph describing how intersection improvements would address the need of separating a rail crossing and reducing the accident rate. The purpose for addressing economic needs may be to improve a highway to four lanes. In this example, alternatives will then be developed and evaluated according to their ability to provide a four-lane highway through the project area as an economic development incentive.

The bottom line on the P&N statement is that it should clearly identify and support the basic problems that will occur without proposed improvements. Proper documentation will serve to both justify the project's need and provide the framework for reasonable alternatives to be defined and evaluated.

Graphics that improve and facilitate the reader's understanding of the P&N should be included. These could include:

- Project Vicinity/Location Exhibit showing the project area in context with nearby major routes, land use features, and nearby transportation features identified.
- A location map illustrating other projects in the area,
- A table illustrating projects in the area and their status,
- A table illustrating traffic projections,
- A table illustrating accident data, and
- A table with LOS of appropriate links.

1.1 Logical Termini

Logical termini are an important concept to include in the discussion of P&N as well as alternatives. The intent of using logical termini is to look at the proposed project within a context broad enough to adequately consider the traffic characteristics, benefits, and environmental consequences. The [FHWA guidelines](#) include three specific components to determine whether logical termini have been determined for a proposed project:

- Sufficient length to address broad environmental concerns;
- Independent utility; and
- Allowing consideration of alternatives for other improvements, either connecting or nearby, which are reasonably foreseeable.

Several adjoining projects may need to be included in the NEPA document to satisfy the requirement for logical termini.

From a legal perspective, using logical termini means that a project can withstand the scrutiny over whether or not segmentation has occurred to lessen the perception of impacts. The

project will have a clear P&N apart from other improvements and will fit within the context of the overall transportation plan.

The discussion of logical termini will be based largely upon the coordination between GDOT and FHWA during the early concept stage of a project. If there is any question concerning the logic of project termini, the NEPA analyst and the Project Manager (PM) will meet with FHWA. This discussion will be recorded in a brief report on the termini analysis which will be sent to FHWA for their review and written concurrence prior to submission of the NEPA document. The report will include the rationale for the termini and a description of the project area; supporting data may include traffic data, LOS, accident data and any additional information justifying the termini. If technical studies commenced prior to FHWA concurrence on termini, the NEPA analyst must confirm that the studies encompass the correct project area.

The text in the NEPA document should explain how the proposed termini are adequate to identify traffic and safety concerns, how the length is appropriate to evaluate impacts, and how impacts of adjacent improvements will be addressed in separate documentation.

1.2 Consultant Deliverables

Consultants should deliver two copies of the P&N Statement for review and approval by the GDOT's Office of Planning and Office of Environmental Services. If a meeting has been held with FHWA to discuss logical termini, the consultant also will prepare the report for FHWA review and concurrence. Two copies of this report will be needed.

After receiving comments from GDOT or FHWA on any document, a disposition letter (including the comment and how it was responded to) should be attached to the hard copy of the submittal and emailed to the GDOT reviewer for their use in facilitating the review of the document.

For any approved document, consultant will provide a CD (with the requested hard copies of the document) that includes a pdf (or series of pdfs) and a Word copy of the complete approved document.

1.3 References

- 40 CFR 1502.13
- FHWA Technical Advisory 6640.8A, pp. 13-14.
- 23 CFR Part 771.111 (f), (h)
- [The Importance of Purpose and Need in Environmental Documents](#)

2.0 Environmental Screenings

2.1 Natural, Archaeological, Historic Resource Geographical Information System (NAHRGIS)

The [Natural, Archaeological, and Historic Resources Geographical Information System \(NAHRGIS\)](#) is a web-based GIS specifically designed for prescreening and researching natural and cultural resources on transportation projects. NAHRGIS should be consulted at the earliest

stages of project development and environmental analysis to determine if there is the potential for impacts to streams, wetlands, protected species, archaeological sites and historic structures. Most of the information contained in NAHRGIS is open for public use, but certain sensitive data such as archaeological site and protected species locations require a password for access. These are generally only available to professional archaeologists and ecologists. The archaeological site files data also require a user's fee. The website provides direction on becoming a registered user.

2.2 Database Searches

The US Environmental Protection Agency (USEPA) provides a free on-line GIS based "EnviroMapper" that includes several useful information layers such as hazardous material sites, flood zones, demographic boundaries, surface water features and Environmental Justice (EJ) communities.

2.3 Windshield surveys

Team members should conduct windshield surveys to assess the presence of community resources, potential hazardous waste sites and underground storage tanks (USTs), the potential for ecological resources as well as to evaluate the potential for historic and other Section 4(f) resources. Please be aware that windshield surveys cannot substitute for a full evaluation of the National Register (NR) eligibility of historic properties or ecological resource delineations and that project decisions should not be made based upon windshield surveys.

A preliminary public involvement strategy also should be developed based upon existing project conditions. A windshield survey can assist in identifying appropriate groups, including low income and minority communities, to target during public outreach activities.

3.0 Early Coordination

Early Coordination is the means by which federal, state, and local agencies, and project stakeholders are informed of a proposed project. The Early Coordination process gives federal, state, local and agencies, and project stakeholders the opportunity to become involved early in the project development phase and share information concerning the proposed project and surrounding area that could be potentially impacted.

3.1 Applicability

All Categorical Exclusions (CE), Environmental Assessments (EA), and Environmental Impact Statements (EIS) are subject to Early Coordination. In some instances, minor projects may not require Early Coordination. Consultants working on minor projects must check with a GDOT Office of Environmental Services NEPA Team Leader or Manager to determine if the Early Coordination requirement can be waived. Please be aware that in addition to NEPA early coordination, all disciplines conduct early coordination activities.

3.2 Initiation

This section will focus on the efforts of the NEPA analyst and the ecology staff when an Individual Permit (IP) is required pursuant to Section 404 of the Clean Water Act (CWA). Efforts undertaken by cultural resource staff can be found in [Chapter V.3](#) of this manual.

Early Coordination is initiated by the NEPA analyst during the concept development phase of the proposed project. All federal agencies that have an action to take on the project should be included. Consultants should coordinate the development of Early Coordination letters with the GDOT Office of Environmental Services. Copies of the Early Coordination letters will be maintained in the project file. A copy of the [basic letter](#) and a [distribution list](#) should be included in the appendix of the NEPA document with reference made to the Early Coordination Letter and distribution list. Comments received must be responded to; comment and response letters also must be included in the appendix of the NEPA document. Consultants will coordinate responses with GDOT. Also, the comment will be addressed in the document, as appropriate.

An Early Coordination letter will contain a somewhat detailed description of the project (proposed typical section, right-of-way, and termini), a request for the addressee to advise of any known project area conditions that may be of special concern, and a list of other projects in the area. It should note whether or not the project will utilize federal funds. It also will state that the design for the proposed project is being developed in conjunction with the environmental documentation and in compliance with applicable environmental laws and regulations.

A project location map will be enclosed with the Early Coordination letter. The project location map will show the general vicinity of the proposed project and roadways, bridges, etc., involved. The map also will include the GDOT Project Number (if one has been assigned), the P.I. Number, name of the proposed project, and the county and/or city. The project beginning and end points will be labeled. A north arrow and a scale will also be included on this graphic.

All Early Coordination responses will be reviewed and considered in the planning of the specific project. Responses and any subsequent correspondence including how the project is modified to address the specific comments also will be included in the NEPA document.

3.3 Sample letters

Early coordination [letters](#) will be on GDOT letterhead unless a consultant is under contract to a local government, in which case the consultant's letterhead will be used. Letters on GDOT letterhead will be signed by an Office of Environmental Services Team Leader or Manager. Additional letter templates are available through the Document Library.

3.4 Coordination with federal land owning agencies

Georgia DOT projects occasionally require land owned by a federal agency. For example, throughout the state, there are National Parks, National Forests, military bases and the US Army Corps of Engineers lake property. The PM and NEPA analyst must coordinate with these agencies early in project development. The right-of-way staff must be included in this

coordination. Federal agencies often have specific NEPA requirements; be sure to discuss these needs early in project development. Specific requirements for the National Park Service are discussed below.

3.4.1 Coordination with the National Park Service (NPS) (when NPS land is needed for the project)

The following are the major steps involved in requests to transfer lands for highway purposes. *These steps assume that the NPS has entered into the initial planning and environmental analysis process at the earliest possible stage of the project. National Park Service involvement should start when the GDOT/FHWA begins looking at the possibility of any activity that may impact NPS lands.*

1. Initial Notification.

This step is usually very informal at one or more first-round meetings. The GDOT informs the FHWA project contact person of the proposed use of NPS lands. The FHWA, with the GDOT, immediately invites the NPS to a joint meeting to discuss the proposed use of NPS land. At this meeting, GDOT gives as full a description as possible of what is being requested. If the initial information provided by GDOT from this meeting indicates that the request would not meet the standards in 23 U.S.C. 317 (i.e., the project is clearly inconsistent with the purposes for which the park was established, or would obviously cause impairment or derogation of park resources or values), and additional consultation would not result in development of satisfactory alternatives, then the park should so indicate at the meeting. This should be followed by a letter of summary denial, sent by the regional director, listing the park's objections and the reasons for them. Evidence of the contrary public interest or inconsistency of the proposed transportation activity with the purposes for which the park was established can be determined through an examination of the park's enabling legislation, general management plan, or other related documents. If the initial information is not sufficient to make a decision, the process continues to the Section 4(f) and NEPA evaluation stage detailed below. Note that if the highway project involves an Interstate Highway, 23 U.S.C. 107(d) applies, rather than 23 U.S.C. 317. 23 U.S.C. 138 (commonly referred to as Section 4(f)) applies in either case. (See [Chapter VI](#) for a discussion on Section 4(f).)

2. Preliminary Evaluation Prior to Official Request.

This is the stage where most, if not all, of the compliance and Section 4(f) evaluations are done, and the process switches from informal to more formal. If the initial request does not result in a summary denial, then the GDOT (as the recipient of FHWA funds), in consultation with the NPS, prepares a draft of the required Section 4(f) evaluation described in 23 CFR 771.135 (see RM-87D). Note that the Section 4(f) and other evaluations and environmental compliance are completed prior to any official submission of a request for NPS lands by FHWA. Note also that Department of the Interior's (DOI) official review of Section 4(f) and NEPA compliance documents is managed by the DOI's Office of Environmental Policy and Compliance (OEPC), under 51 DM 7. The NPS is generally designated as lead bureau for the DOI in these matters. In that role, the NPS

receives other bureau comments on certain Section 4(f) and NEPA documents, and consolidates them into the DOI comments, which are signed by the Director, OEPC. If the NPS disagrees with the Section 4(f) evaluation, then the NPS should meet with FHWA to discuss the reasons for such disagreement. This should be followed by a letter of denial of the project, sent by the regional director, listing the park's objections and the reasons for them. If the NPS agrees with the Section 4(f) evaluation, then the process continues on to the environmental (and cultural, if applicable) evaluations. With the NPS as a joint lead or cooperating agency, the GDOT and FHWA prepare an environmental analysis as required under NEPA and related laws for public review and comment (including National Historic Preservation Act [NHPA] Section 106 evaluations and Clean Air Act Section 176(c) transportation conformity requirements). Note that these processes are also completed prior to FHWA's official submission of a request for NPS lands. At the close of the NEPA public review period, the NPS participates with the GDOT and FHWA in a review of the public comments and the potential environmental and cultural impacts resulting from the proposed use of park land. If it is clear from the environmental analysis and public review comments that the proposed use would be inconsistent with the park's purposes and values, the NPS will so advise the FHWA through a letter of denial from the regional director, and the process is terminated. If the final compliance analysis and public review do not result in a finding that the proposed use is inconsistent, the GDOT should proceed in seeking approval and finalization of all compliance documents. Once all compliance documents have been approved, the GDOT sends the proposal requesting use of NPS lands to the FHWA Division Administrator for the state where the requested land is located.

3. Official Request by FHWA for NPS Land.

At this stage most, if not all, compliance documents have been completed and approved. For the first time, the FHWA sends an "official" letter to the NPS requesting the land for highway purposes. Most, if not all, of the preliminary decisions have been made at this point, and the primary purpose should be to allow the NPS the opportunity to make a final check on the documentation, and edit the conditions in the draft Highway Easement Deed (HED). The FHWA sends the request, together with copies of all executed and approved compliance documents to the appropriate NPS regional director requesting a letter of consent to, or denial of, the request. The required four month period begins with receipt by the regional director of the request from FHWA. The regional director then consults with the appropriate park superintendent and responds to the request within the statutory deadline of 4 months. The park superintendent originates a letter of denial or consent, indicating either:

- a. Agreement to consent subject to terms, conditions and stipulations, to be placed in the HED; or
- b. Conditional denial, pending further consideration of possible modification of the proposed project that might be taken; or
- c. Denial with no chance of modification, specifying the reasons for denial. The regional director signs the letter and returns it and the requesting package to the

originating FHWA office. If the NPS denies the request for transfer of NPS lands, the FHWA will so advise the GDOT. The FHWA will cite the NPS reasons for such a ruling, and advise the GDOT that the project cannot use the park lands as proposed. If the NPS has agreed to the request for transfer of park lands, the FHWA will communicate this, including all conditions, stipulations, and modifications specified by the NPS in the letter of consent to the GDOT. The GDOT will then prepare an HED in accordance with the terms and conditions specified in the NPS letter of consent.

4. The Highway Easement Deed (HED)

The recommended method of dealing with an HED is for the GDOT and NPS to discuss what will be needed in step 2 above, then send a first draft to the NPS in step 3 above. That way, all three parties are familiar with its contents and final wording settled on more quickly. The GDOT sends the draft HED to the FHWA and NPS for review. After review and approval by NPS, the FHWA signs the resulting document for the United States and sends it back to GDOT. The GDOT signs and records the deed in the appropriate municipal land records office. The GDOT provides a copy of the signed and recorded deed to the NPS.

CONDITIONS IN A HED

A Letter of Consent signed by a regional director normally should require that at least two specific conditions be included in every HED:

1. A prohibition on "piggy-back" permits; and
2. A reversionary clause.

Suggested language for, and explanations of, these and several other useful conditions may be found in RM-87D. There are also occasions when the GDOT road design, engineering, or construction style would cause practical, environmental, and/or esthetic value concerns with the NPS. While this situation might not arise very often, these instances should be handled on a case by case basis, with the NPS consulting with the FHWA to assure compliance where applicable.

Note that, whether the Letter of Consent includes these clauses or not, if the NPS consents to the request for land, the grant is for a non-exclusive easement to the GDOT for HIGHWAY PURPOSES ONLY. The GDOT cannot:

- Issue subsidiary permits for utilities within the highway right-of-way covered by the Deed;
- Allow any other construction such as houses or office buildings, or material storage areas unless specifically included within the request; or
- Approve requests to do anything on that portion of the roadway covered by the Deed other than for highway purposes.

Any new highway or road improvement requiring additional land will require an HED as described here. Any conversion of an existing instrument, such as a Special Use Permit, even

though it does not involve use of undisturbed land not covered by the original permit, must also follow this procedure and meet the criteria in section D.3. Conversion from another instrument might, however, qualify for a NEPA and/or NHPA categorical exclusion

[The statements above were provided by NPS's Southeast Regional Office and taken from Director's Order 87D, National Park Service Policies.]

3.5 Coordination with the US Coast Guard (USCG)

If the project involves a historically navigable water, the NEPA analyst must complete a [bridge permit questionnaire](#) and submit it to FHWA for a determination of the need for a USCG permit. If FHWA indicates that the project will require a USCG permit, the Office of Bridge Design will prepare and submit the permit application.

The USCG permit limits for navigable rivers in Georgia, interstate or foreign commerce navigation in fact, are as follows:

- Chattahoochee River – from the dam at West Point Reservoir, downstream to the Georgia-Florida border;
- Flint River – from the dam at the Georgia Power Company Reservoir at Albany, downstream to its junction at the Chattahoochee River;
- Coosa River – from the junction of the confluence of the Etowah River and the Oostanaula River, downstream to the Georgia-Alabama border;
- Etowah River – from the Norfolk-Southern Railway bridge immediately east of the US 27/SR 1 bridge near Rome, downstream to the junction with the Coosa River;
- St. Mary's River – from the US 301 bridge near Folkston, downstream to the Coastal Boundary Area;
- Altamaha River – from the confluence of the Oconee River and the Ocmulgee River, downstream to the Coastal Boundary Area; and
- Savannah River – from the dam at Clarks Hill Reservoir, downstream to the Coastal Boundary Area.

3.6 Early Coordination mailing list

Current agency contact information can be found in the [distribution list](#). Please note that this is not a comprehensive list.

3.6.1 Federal agencies

- US Department of Housing and Urban Development, Regional Office of Environment
- National Center for Environmental Health
- US Department of Housing and Urban Development
- US Department of the Interior
- US Fish and Wildlife Service
- US Geological Survey, Environmental Affairs Program
- US Environmental Protection Agency, Region Four

If in North Georgia counties: Catoosa, Dade, Fannin, Rabun, Towns, Union, and Walker.

- Tennessee Valley Authority

If in Coastal Counties or Estuarine Systems (tidal or salt water marsh) include:

- Habitat Conservation Division, National Marine Fisheries Service

If in Coastal Counties or Estuarine Systems (tidal or salt water marsh) and marine species are listed in the county:

- National Marine Fisheries Service, Southeast Regional Office

If an Individual Permit will be obtained, coordinate with cooperating Agency Letter:

- US Army Corps of Engineers, Savannah District, Regulatory Functions Branch

If Coast Guard permit is required, coordinate with cooperating Agency Letter:

- 7th Coast Guard District, Commander OAN

FEMA letter for Regulatory Floodways

- [Federal Emergency Management Agency, Mitigation Division](#)

Carbon copy the FEMA letter to:

- Georgia Department of Natural Resources, Floodplain Management Office and
- Federal Highway Administration, Georgia Division

3.6.2 State agencies

- Georgia Department of Natural Resources, Natural Heritage Program
- [Natural Resources Conservation Service](#)
- Georgia Forestry Commission
- Coastal Resources Division, Department of Natural Resource (if in a coastal county)

3.6.3 Regional Commissions

An [Early Coordination letter](#) should be sent to the appropriate Regional Commission for the proposed project. Letters to Regional Commissions should include a request for information concerning low income and minority communities. For a map showing counties within each Regional Commission's jurisdiction, as well as websites and contact information, go to <http://www.gardc.com/>.

3.6.4 Other Agencies

Any other association, governmental unit, or organization that is anticipated to have an interest in, or be affected by, the proposed project should be sent a copy of the Early Coordination letter. Other agencies may include the following:

- National Resources Conservation Service in addition to standard letter, if there is involvement with farmland
- Metropolitan Planning Organizations
- County Commissions
- Mayors
- Official Federal Cooperating Agencies not already listed
- Federally Recognized Tribes Culturally Affiliated with Georgia (see 106 notification in [Chapter V.3](#) of this manual)

4.0 Preliminary surveys for environmental resources

Surveys for environmental resources that have the greatest potential to influence alignment decisions should be conducted during concept development. These include

- Historic resources and their boundaries,
- Non-historic Section 4(f) resource boundaries (publicly owned parks, recreation areas, wildlife & waterfowl refuges),
- Jurisdictional Waters of the US (wetlands, streams, & open waters),
- Vegetative buffers (25 feet for warm water streams and state waters, 50 feet for cold-water trout streams),
- Cemeteries, and
- Threatened & Endangered species and their habitat.

Appropriate agency consultations concerning resource identification also should be conducted at this time.

The archaeologist also can provide an archaeological evaluation and ranking based on high site potential/sensitivity using archaeological environmental screening results to support, in association with other special studies, the narrowing down of alternatives. Not until a preliminary alignment has been developed will the field survey for archaeological resources be conducted.

Once the environmental team members have transmitted survey reports to the PM, all environmental resources must be shown on all project layouts and plans.

5.0 Practical Alternatives Review (PAR) process (see [Chapter V.4](#) for details)

A Practical Alternatives Review (PAR), including a PAR Report, will be prepared for those projects that require an Individual Permit (IP) in accordance with Section 404 of the CWA. The report will justify the alignment preferred by GDOT and will include construction cost estimates for the various alternatives considered. See [Chapter V.4](#) for more information about the PAR process.

6.0 Approved Concept Report

While an approved project Concept Report is not needed before Early Coordination can be initiated, the project concept should be far enough along in the conceptual phase such that an accurate project description and location map can be included with the letter.

7.0 References

- Federal Register, 1982. Presidential Executive Order 12372. FR Vol. 47, No. 137.
- USDOT. FHWA - The Environmental Guidebook - [Interagency Coordination](#). August 19, 1983.