CHAPTER IX - ENVIRONMENTAL CERTIFICATIONS

Introduction

An environmental certification is required at three milestones during the Plan Development Process (PDP):

- 1. Preliminary Field Plan Review (PFPR),
- 2. Final Field Plan Review (FFPR), and
- 3. Let.

1.0 Field Plan Reviews

The Georgia Department of Transportation's (GDOT) Office of Engineering Services conducts field inspections of project plans and special provisions at two stages of the PDP. In addition to Engineering Services, attendees include the Project Manager (PM), Design Office and representatives from the following offices: Bridge Design (if the project has a bridge or a retaining wall), Utilities, Construction, Materials and Research, Right-of-Way (ROW), Traffic Operations, Maintenance, the Area Engineer, and Environmental Services. The NEPA analyst is required to prepare for and attend these meetings (including GDOT and local government consultants). Environmental personnel in other disciplines also may be required to attend as needed to ensure that all environmental resources are properly delineated on the plans and all commitments/special provisions/plan notes are properly captured on the plans at the FPR (see Chapter VIII). The project team must pay particular attention to both the Green Sheet (Environmental Commitments Table) and the Environmental Resource Impact Table.

Potential conflicts between environmental commitments and construction MUST be identified during these field plan reviews. Resolution of such conflicts during construction often results in additional construction costs and project delays.

1.1 Preliminary Field Plan Review (PFPR)

The Office of Engineering Services conducts a field review of the preliminary plans and the draft special provisions prior to the approval of ROW plans. The emphasis of this review is the coordination of ROW, utilities, bridges and walls, constructability, signs and signals, drainage, and environmental considerations and commitments. For Major Projects, the approval of the PFPR Report defines the beginning of final design.

The GDOT NEPA analyst sends a PFPR Certification to the PM upon request. The certification notes the approval date of the environmental document and "that any change in the project as described in the approved environmental document will require additional review by Environmental Services and possible reevaluation." The project environmental commitments table (Green Sheet) will be attached to the certification (see Chapter VIII). Per the PDP, the PFPR cannot be held until the NEPA document is approved by the lead federal agency, so the certification cannot be completed until the NEPA document is approved.

Once the PFPR has been scheduled, the NEPA analyst will prepare the Field Plan Review Checklist, update the Green Sheet, and submit both to the Office of Engineering Services and the PM at least three days prior to the scheduled PFPR date.

As part of preparing the PFPR checklist, the NEPA analyst will notify the specialists of the date of the PFPR and circulate the plans with adequate time to ensure specialist review. The NEPA analyst will circulate the Field Plan and Green Sheet Review sheet as part of this review. This review sheet will go into the project file after the PFPR to demonstrate that all environmental team members reviewed the plans. The NEPA analyst will ensure that all commitments concerning plan development have been completed and will confirm that special provisions have been received by the PM. (For projects consulted out by the GDOT, the GDOT NEPA analyst and PM should ensure that man-hours are included so that the consultant can prepare for and attend all PFPRs. Local government consultants also must prepare for and attend PFPRs.)

Environmental commitments concerning plan development often include the delineation of environmental resources on the plans as well as plan notes ensuring that environmental impacts will be minimized during construction. This review also will confirm the content and accuracy of the Environmental Resource Impact Table.

1.2 Final Field Plan Review (FFPR)

The Office of Engineering Services conducts a review of final plans and specifications, special provisions, permits, environmental commitments and ROW agreements prior to the let at the FFPR.

The GDOT NEPA analyst sends a FFPR Certification to the PM upon request. The certification notes "that any change in the project as described in the approved environmental document will require additional review by Environmental Services and possible reevaluation." The Green Sheet will be attached to the certification (see Chapter VIII).

Once the FFPR has been scheduled, the NEPA analyst will prepare the Field Plan Review Checklist, update the Green Sheet, and submit both to the Office of Engineering Services and the PM at least three days prior to the scheduled FFPR. The NEPA analyst will ensure that all commitments concerning plan development have been completed and will confirm that special provisions have been received by the PM.

As part of preparing the FFPR checklist, the NEPA analyst will notify the environmental team members of the date of the FFPR and circulate the plans with adequate time to ensure specialist review. The NEPA analyst will circulate the Field Plan and Green Sheet Review sheet as part of this review. This review sheet will go into the project file after the FFPR to demonstrate that all environmental team members reviewed the plans. The NEPA analyst will ensure that all commitments concerning plan development and the construction contract have been completed. (For projects consulted out by the GDOT, the GDOT NEPA analyst and PM should ensure that man-hours are included so that the consultant can prepare for and attend all FFPRs. Local government consultants also must prepare for and attend FFPRs.)

Environmental commitments concerning plan development and the construction contract often include the delineation of environmental resources on the plans as well as plan notes insuring that environmental impacts will be minimized during construction. The NEPA analyst must ensure that any commitments made after the PFPR have been added to the project plans and will confirm that special provisions are included in the contract. This review also will confirm the content and accuracy of the Environmental Resource Impact Table.

2.0 Certification for Let

Eleven weeks prior to let, the GDOT NEPA analyst must certify the project for let. The Certification includes a checklist noting that a NEPA document has been approved, the date of the last approval (either the document itself or a reevaluation) and if any changes have occurred since the last approval date.

The project cannot be certified for let if the NEPA document has not been approved or if all preconstruction commitments have not been completed (e.g., Section 404 permit has not been obtained, all mitigation credits have not been obtained, etc).

The NEPA analyst must work with the PM and/or designer to determine if any changes have been made since the last environmental approval. The NEPA analyst also must determine if changes to the affected environment or environmental regulations have occurred. If project changes, changes to the affected environment or regulations have occurred since the last approval, the project cannot be certified for let and a reevaluation must be completed (see Chapter VII).

If the most recent approval occurred less than 12 months prior, there have been no project changes, and all preconstruction commitments have been completed (including the obtainment of all permits, which could include, but is not limited to, Section 404 permits and Buffer Variances), the GDOT NEPA analyst will certify the project for let. An updated environmental Green Sheet will be included (see Chapter VIII). The certification also can serve as a "nochange" reevaluation (see Chapter VIII).

If the most recent environmental approval occurred more than 12 months prior to the certification date, a "no change" reevaluation must be completed and submitted to FHWA for approval prior to certifying the project for let.