

# Environmental Analysis

## Early Activities

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### OBJECTIVE

Early activities allow the Environmental Analyst to advance a project through the Concept Phase. They also allow the project team to address special considerations early in the project's development and facilitate approval of the Concept Report. Through early activities, the Environmental Analyst will accomplish the following:

- > Collect early information to kick off environmental studies by requesting resource identification studies from the Environmental Subject Matter Experts (SMEs);
- > Begin surveying the social environment surrounding the project;
- > Conduct the required early coordination with the appropriate parties;
- > Kick-off public involvement; and
- > Provide meaningful participation in the Concept Team Meeting and Concept Report development.

### EARLY PROJECT INFORMATION

Early in a project's development, the Environmental Analyst must assemble project information to begin activities. The Environmental Analyst typically acts as the lead for kicking off and monitoring progression of all environmental studies in close relationship with the GDOT Project Manager (PM). The Environmental Analyst provides project information to the Environmental SMEs allowing them to begin resource identification surveys and other early activities. Some of this information is required to conduct early coordination, some is required before going out into the field, and some is required for documentation.

### Concept-level Project Description

The concept-level project description is used for early coordination, environmental survey reports, and the Concept Report. It is provided by the PM and the design team. It will not have all project details found in the project descriptions used in environmental technical studies and the environmental document, but it should be consistent with these subsequent descriptions. If the concept-level project description is contradicted by later project descriptions, some explanation may be needed, and additional coordination and study may be required. All early environmental activities should use the project description provided by the Environmental Analyst. The description consists of the following components:

#### Brief Summary

The first sentence or two offer a short summary of the project. The summary should describe the project's location and identify the primary work associated with the project.

Example: The proposed project widens State Route (SR) 101 from two to four lanes with a center turn lane. The widening begins at the intersection of SR 123 and ends at Main Street.

#### The Existing Facility

Next, the description should provide some details about the existing facility, including the typical section and the existing right of way.

Example: The existing typical section of SR 101 consists of two 12-foot travel lanes, one in each direction, with 8-foot shoulders (2 feet paved, 6 feet unpaved) and rural side ditches. Existing right of way (ROW) varies between 50 and 80 feet along the roadway centerline.

#### The Transportation Problem

The description should also include a discussion of the problem the project will address.

Example: The project is being considered to accommodate the increase in daily traffic volume due along SR 101. The project would address future congestion, safety, and operational issues along the route.

#### The Proposed Facility

Then, the description should provide some details about the proposed project, including the typical section (if available), an explanation that the project will/will not require ROW and/or easement, and the estimated project length. If other details are known about the proposed facility, such as the distance from centerline of required ROW (example required ROW would vary from 60-110 ft from centerline), off-site detour needs, and additional work (such as the addition of traffic signals or intersection controls), then the details can be included in this part of the description.

Example: The proposed widening has a typical section consisting of four 12-foot travel lanes (two in each direction) with an 11-foot center turn-lane, 8-foot shoulders (2 feet paved, 6 feet unpaved), and rural side ditches. Turn lanes, traffic signal upgrades, traffic signal installation, and bridge construction over Shoal Creek are included in the project.

The required ROW/easement is yet to be determined. The project length is approximately 4.5 miles.

### Environmental Survey Boundary

The PM provides the Environmental Analyst with the Environmental Survey Boundary (ESB) for inclusion in the request for resource identification and distribution to the Environmental SMEs. The Office of Environmental Services (OES) does not provide concurrence on ESBs. It is produced by the design team to define the area to be surveyed for environmental resources. Receipt of the ESB is a P6 delivery activity. The design team uses a concept-level approximation of the project's required ROW and easement to develop the ESB. In general, the ESB is the concept-level footprint plus 100-feet in all directions. More information about the ESB is available here:

Environmental Survey Boundary Guidance,  
Georgia Department of Transportation

The design team is responsible for monitoring the design in comparison to the ESB. The team should notify the Environmental Analyst if its design approaches or goes outside the ESB. Some key design concerns that affect the ESB are sideroad considerations, the need to raise bridges, signing and marking outside a project's limits, and the inclusion of rumble strips at approaches.

### Property Access Notification

Before any project team member can access private property for a field survey, the property owner must be notified through a property access notification letter. For in-house and consultant projects, the PM provides the initial notification letters and distributes them to the property owners. The letters allow access to the properties for six months. If letters are needed after six months, then the Environmental Analyst (either in-house or consultant) must prepare new letters. These letters need the signature of an Environmental Analyst Team Leader, and the PM distributes the signed letters to property owners. The letter template is available in the "Design Policy & Support" category here:

Design Related Resources,  
Georgia Department of Transportation

Notification letters to property owners should be distributed at least 30 days before field activities. The Environmental Analyst must also ensure that the Environmental SMEs performing field activities have a copy of the notification letter. Environmental SMEs should carry copies in the field to provide to property owners, if approached. It also must be up to date. *If the letter is over six months old, then a new letter must be distributed.*

### Railroad Property

The standard property access notification letter is not sufficient to access railroad property. If physical access to railroad property is needed for an environmental investigation, the project team must apply for access through the owner of the railroad (typically a private company) and receive approval. The SME discipline may be responsible for applying for the application for a Right of Entry (ROE) with the railroad and handle the approval. However, the SME discipline may coordinate in advanced with the PM on addressing the ROE especially if other GDOT disciplines would need access (e.g., land surveyors).

The process of getting the ROE generally takes six to eight weeks and may include costs or fees, which depend on the activity and the length of time needed on the property. For example, depending on how close the investigation is to the tracks, protective services (flagman) may be required. It is the owner of the railroad that will determine if and when protective services are needed. The Environmental Analyst may contact the State Railroad Liaison Manager concerning any questions.

### Project Justification Statement

The Project Justification Statement (PJS) should be available at the start of the project. The PM typically requests it through the Project Team Initiation Process. Depending on the project, the PJS is requested from the Office of Planning, the Office of Traffic Operations, or the Bridge Office. It identifies and explains the major transportation problem, or problems, that the project should address. For very minor projects, the PJS will be a statement. For mid-scale to major projects, it will be a report and may include no-build condition data, including traffic, LOS, and crash statistics.

The Environmental Analyst should evaluate the PJS at this stage for consideration of the project's Need & Purpose (N&P), particularly for federal-aid projects. Regardless of project funding, the Environmental Analyst also provides the PJS to the project's Environmental SMEs. For some survey reports, the Environmental SMEs may incorporate the PJS into a brief discussion of the project's N&P.

## EARLY COORDINATION

The Environmental Analyst conducts early coordination at the beginning of the Concept Phase. Through early coordination, GDOT informs federal, state, local agencies, and other stakeholders of the proposed project. These parties may become involved in the initial stages to share information about the area and potential resources.

On federally funded projects, Early Coordination is required for all Categorical Exclusion (CE), Environmental Assessment (EA), and Environmental Impact Statement (EIS) projects. For Programmatic Categorical Exclusions (PCE) project, Early Coordination is *not required* if the project has no required ROW, no off-site detours, no need for public involvement, and minimal potential for controversy.

On state funded projects, Early Coordination is required for major widening and new location projects. For smaller-scale projects, Early Coordination should be conducted to confirm that the potential for adverse social effects is minimal.

More details on early coordination are available in the Early Coordination Guidebook and the templates for Early Coordination letters and the Distribution List on the Environmental SharePoint Site for Environmental Analysts. These materials include direct contact information and the preferred methods of outreach.

Early coordination administered by other GDOT offices, such as detour coordination with questionnaires, that would be used by the Environmental Analysts should be reviewed and validated for completeness as additional coordination may be required by the project team for an acceptable conclusion.

### SOCIAL ENVIRONMENT SURVEY

For most projects, early in their development, the Environmental Analyst conducts a desktop review and field survey of the project corridor to assess the surrounding social environment. The information gathered about the corridor is used for early coordination and Concept Report development but may be relevant throughout the life of the project. Further guidance concerning the social environment is available in other guidebooks, but the guidance provided here is sufficient for the Environmental Analyst to conduct early activities related to the social environment.

The goal of the social environment survey is to identify the resources that might be affected by the projects. Social environment resources include the following:

- > Geographically defined communities, such as residential neighborhoods, apartment complexes, etc.;
- > Dispersed residences that could be similarly affected by the project (e.g., experience the same traffic increases);
- > Public Service Institutions: schools, libraries, fire and police stations, hospitals, daycares, and retirement homes, etc.;
- > Potential Environmental Justice communities, and resources supporting those communities;
- > Places of worship;
- > Cemeteries and burials;
- > Businesses or business districts, including businesses that provide services that are not otherwise available within a reasonable distance of the project (e.g., major/regional employers, trucking/warehouses to include timber operators, and agricultural operations);

- > Special (organized) events (e.g., annual bicycle race);
- > Parklands, wildlife, and recreation areas; and
- > State and federal properties including conservation easements.

The Environmental Analyst should be able to identify many of these resources with a desktop review of the project corridor using standard search engines and online mapping tools. The review helps inform how early coordination is conducted. The desktop review should be followed up with a field survey to validate the findings of the review and identify other resources. Through early coordination and Concept Report development, more social environment resources may be identified. These will be further considered as the project advances, including during early coordination, public involvement, and field reviews.

Minor projects, such as maintenance projects, have a low potential to disrupt these resources, and therefore require less effort from the Environmental Analyst in terms of identifying resources and coordinating concerns to the project team. Projects with a higher potential to disrupt the social environment require more effort. They generally involve:

- > Displacements (commercial or residential) or removal of parking;
- > Changes to access (median placement, driveway removal, converting a roadway into a cul-de-sac, or similar); or
- > Disruptive activities during construction, such as an off-site detour.

These projects require more public involvement activities, more complex environmental documentation (if federal aid projects), and more coordination with the project team to avoid and minimize impacts on the social environment.

## CONCEPT ACTIVITIES

The objective of the Concept Phase is the development of a Concept Report that describes a recommended project footprint, including the project termini. Concept Report development includes meetings and the preparation of an environmental summary.

### Concept Team Meetings

Concept Team Meetings are called by the PM to present the proposed concept and alternatives. The meetings are held in the GDOT District where the project is proposed. The PM determines what participants attend. Attendees are expected to be familiar with the project. The Environmental Analyst (whether GDOT, consultant, or both) generally attends. Often local leaders, outside government agencies and utilities may attend or be invited as well. The Environmental Analyst may gather important information about the resources in the project corridor at these meetings, particularly from the local leaders familiar with the corridor's social environment. Meeting topics relevant to the Environmental Analyst include:

- > Location of environmental resources such as:

- Wetlands, open waters, streams, and their state protected buffers;
  - Park lands;
  - Historic properties, archaeological sites;
  - Cemeteries and burials;
  - Location of potential hazardous waste sites;
  - Underground storage tank sites;
  - Threatened and endangered species;
  - Special (organized) event and schedule;
- > Public Outreach Plan;
  - > Alternatives considered and rejected to date sufficient for inclusion into environmental documents and reports;
  - > Practicable Alternative Review (PAR) report;
  - > Type of environmental document anticipated;
  - > Potential Section 4(f) and Land and Water Conservation Fund resources;
  - > Federal lands (such as National Park Service or Forest Service properties); and
  - > Environmental permits/studies needed (e.g. Section 404, TVA, species surveys, etc.).

The Environmental Analyst may be called upon to provide some project-level information related to the topics above. Depending on the complexities of the project, the Environmental Analyst may need to invite the relevant Environmental SMEs to the meeting.

Additionally, if federal land involvement is anticipated and project is federally funded, coordination with FHWA on the level of involvement with the federal land holding agency may be necessary. If project is state funded, direct coordination with the federal land holding agency and their involvement in the concept development is recommended as early as possible.

### Initial Concept Team Meeting

The purpose of the Initial Concept Team Meeting is to ensure the development of a quality concept for the proposed project. It helps organize GDOT's resources by identifying the core team and specialty team members, establishing lines of communication and responsibilities between team members, and validating the Project Justification Statement before working on the concept. The Environmental Analyst participates in the meeting by identifying environmental risks associated with the project and providing reduction or

mitigation strategies to address those risks. Routine or minor projects may not require an Initial Concept Team Meeting. The PM will determine if a meeting is needed.

### Concept Team Meeting

The purpose of the Concept Team Meeting is similar to the initial meeting, but it includes a review of the draft Concept Report. The PM may task the Environmental Analyst and/or the Environmental SMEs with providing an environmental summary in the final Concept Report.

### Concept Report Preparation

The Environmental Analyst is responsible for providing the PM with an environmental summary for preparation of the Concept Report. Generally, the analysis includes a survey of the environmental resources following the Environmental SMEs survey report guidelines. However, in some cases, the Concept Report may only include a desktop analysis of the environmental resources and considerations. Additionally, the Concept Report should include a discussion of the PAR, if required. A PAR is required if the project is expected to require a Section 404 Individual Permit or a Regional General Permit 35. The PAR is the responsibility of the project's Ecologist, but the Environmental Analyst is involved in coordinating the results of the PAR. If a PAR is expected to be required but will not occur in time for consideration through the Concept Report, then the project team must coordinate with the State Environmental Administrator (OES Office Head) to describe the need for the PAR and anticipate the impact to the project's schedule.

The PM, the Environmental Analyst, and the Environmental SMEs must coordinate to ensure the project's Concept Report contains the appropriate level of detail. The Concept Report concludes with an anticipated footprint, and the project team must ensure that the footprint was developed with a good understanding of environmental considerations. If not, the Concept Report may not be approved, and the schedule may be impacted.

## OTHER ACTIVITIES

In addition to the discussions above, the Environmental Analyst is responsible for other activities early in a project's development. These topics are discussed in more detail by other guidance, but a brief discussion of each topic is provided here.

### Need & Purpose

The Need & Purpose (N&P) establishes the basis for the transportation project. It serves several functions, but its critical role is to provide the range of reasonable alternatives considered during the Concept Phase. At this phase, the Project Justification Statement provides the backbone of the N&P. The Environmental Analyst must work with the PM to address any deficiencies or challenges associated with incorporating the N&P in environmental documentation—particularly National Environmental Policy Act (NEPA) documents, if applicable.



### Logical Termini

Logical Termini describes the beginning and ending points of a project and whether the selection of these points has a rational basis. Logical termini are primarily a concern for projects that involve a federal action, such as federal aid or federal permitting. All projects that require EAs and EISs, typically capacity adding projects, as well as trail projects require an analysis of logical termini called a Needs Effectiveness and Logical Termini (NELT) form. At the Concept Phase, the Environmental Analyst should determine if there are concerns with logical termini and if a NELT should be prepared to address logical termini concerns.

### Public Involvement Requirements

Early in a project's development, the Environmental Analyst considers what public involvement will be required. If the project includes displacements, changes to access, public controversy, Environmental Justice considerations, or off-site detours, then public involvement (such as a Public Information Open House) may be required at some point during the project's development. Also, the plan for the project may call for public input on the project alternatives early in its development. Projects requiring a NEPA EA or EIS will also include a Public Hearing Open House before final NEPA document approval. To ensure public involvement is addressed appropriately and on schedule, the Environmental Analyst may have to develop some form of Public Outreach Plan as part of the project's early activities. Public involvement should take place as an early activity, and it could occur multiple times throughout development.

### NEXT STEPS

Early activities conclude with the completion of the Concept Report. Resource identification survey reports should be approved at this phase. After this, the project team may hold the Avoidance and Minimization Measures Meeting (A3M). The A3M is a Preliminary Design activity. Once the A3M is held, design provides preliminary plans, which incorporate the results of the A3M. With preliminary plans, Environmental SMEs begin developing their technical studies, and the Environmental Analyst can begin drafting NEPA documentation (for federal-aid projects).

### *Guidebook Revision History*

Revision Description	Relevant Sections	Revision Date
Initial Publication	All	11/6/2020
Updated Hyperlink Buttons	Early Project Information	4/23/2021
Reduced EC and minor updates	All	10/25/2024