

Environmental Analysis

Early Activities

Objective
Early Project Information
Early Coordination
Social Environment Survey
Concept Activities
Other Activities
Next Steps

OBJECTIVE

Early activities allow the Environmental Analyst to advance a project through the Concept Stage. 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 estimated required ROW, 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, bridge construction over Shoal Creek are also included in the project.

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

Environmental Survey Boundary

The PM provides the Environmental Analyst 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 direction. More information about the ESB is available here:

Environmental Survey Boundary (ESB) 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, 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 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.*

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 Stage. Through early coordination, GDOT informs federal, state, and 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.

More details on early coordination are available on the Environmental SharePoint Site for Environmental Analysts. Find the latest contacts and the preferred methods of outreach through OES's *Early Coordination Guidance and Distribution List*.

When Needed

Determining how to conduct early coordination depends on several factors: the project's funding (state-funded or federal-aid), the size of the project, the potential for the project to impact surrounding resources, and the potential for stakeholder interest. The guidelines below describe the conditions that require early coordination.

Coordination by Environmental SMEs

The Environmental Analyst should also be aware that the Environmental SMEs conduct early coordination, or consultation, for their own respective disciplines. For example, the Ecology Section coordinates with the US Fish and Wildlife Service regarding threatened and endangered species. The Environmental Analyst should not conduct early coordination that is covered by another section or discipline, as this leads to confusion.

Coordination for Projects requiring an Environmental Impact Statement or an Environmental Assessment

- > Regional Office of the Environment, US Department of Housing and Urban Development;
- > Office of Quality Assurance, US Geological Service;

- > National Center for Environmental Health and the Agency for Toxic Substances and Disease Registry, Center for Disease Control;
- > National Environmental Policy Act (NEPA) Section of Strategic Programs Office, US Environmental Protection Agency; and
- > Tennessee Valley Authority (TVA), if in Catoosa, Dade, Fannin, Rabun, Towns, Union, or Walker counties.

Coordination for Major Projects (federal-aid or state-funded projects involving displacements, changes to access, and/or the potential for community impacts)

- > The Regional Commission;
- > The Municipal Planning Organization (MPO), if within an MPO;
- > The County Commission;
- > The Municipal Government, if within a city limit;
- > Potentially-affected local government services (emergency services, school district, recreational centers along the corridor); and
- > Potentially-affected stakeholders (places of worship, institutions, and community groups, such as home-owners associations in the project corridor).

Coordination for Projects with Federal Property or Facilities in the Project Corridor
Regardless of the project funding or potential for impacts, the Environmental Analyst must coordinate with federal agencies if federal property is in the project corridor or is required by the project. Some federal agencies that may have property along the corridor include (but are not limited to):

- > US Department of Agriculture, National Forest Service;
- > US Department of the Interior, National Park Service;
- > US Army Corps of Engineers – the Ecology Section may be coordinating with this agency related to Clean Water Act Permits, however, if coordination related to property or facilities is required, this should be handled by the Environmental Analyst; and
- > US Department of Defense.

The PM and the Environmental Analyst (working with GDOT ROW personnel) should establish a contact responsible for the property or facility at the impacted agency. If property is required, some agencies have specific NEPA requirements, permitting activities, and/or other legal requirements (such as Section 6(f)), interagency discussions regarding these requirements should begin as early as possible.

Coordination for Projects with Offsite Detours

- > Local government services: emergency services, school district, city and/or county government. (The Environmental Analyst should contact the PM about the need for this coordination. Generally, the PM conducts this coordination with the District and Area Office personnel. It is possible that the needed coordination has already taken place through Concept Team Meetings and all that needs to be done is to document this coordination for the file.)

Additional Coordination

Additional coordination may be required depending on specific project conditions:

- > Georgia Forestry Commission, if the project converts a significant amount of forest land, either public- or privately-owned;
- > Coastal Management Division, Department of Natural Resources, if the project is in one of the eleven counties (Brantley, Bryan, Camden, Charlton, Chatham, Effingham, Glynn, Liberty, Long, McIntosh, and Wayne) along the coast;
- > Floodway and floodplain coordination, if the project encroaches upon regulatory floodplains or floodways (GDOT's OES uses a special template for this coordination available through OES's Environmental SharePoint Site, permission required for access);
- > Natural Resource Conservation Service, if the project includes ROW impacts to prime farmland (OES uses a special template for this coordination); and
- > US Coast Guard coordination, which is typically conducted by the GDOT Bridge Office if the project involves disruptive activity over a historically navigable water and documentation is included in the NEPA document (the Environmental Analyst should be aware of this coordination but is not responsible for conducting it).

During the Concept Stage, the Environmental Analyst may not have all the project information needed to perform the additional coordination described above. If information (such as farmland ROW) is not available, the coordination can be conducted later during project development.

Early Coordination Letter

The contents of the letters are available in templates on the Environmental SharePoint Site. However, the templates must be tailored to the early coordination recipients to ensure meaningful participation. Additionally, as the appropriate contacts are established, the letters are conveyed through email instead of hardcopy letters.

Review Process

The Environmental Analyst first establishes the early coordination distribution list appropriate for the project (based on the *Early Coordination Distribution List*, available on

the Environmental SharePoint Site) and then drafts coordination letters tailored to the recipients on the list. The draft list and letters are then submitted for review. A GDOT Environmental Analysis Team Leader provides the State Environmental Administrator signature. Then the Environmental Analyst (whether in-house or consultant) submits the letter to the recipient, copying the PM. The Environmental Analyst becomes the point of contact for this early coordination. Early coordination letters should be distributed by email when possible. OES experience shows that early coordination recipients are more likely to respond to emails. The letters and any responses must be included in the project file.

Response and Documentation

The point of contact, the Environmental Analyst that sends the letter, is responsible for documenting and answering the early coordination responses. All early coordination and responses should be shared with the PM and the GDOT Environmental Analyst (for consultant projects) and included in the project file. For federal-aid projects, the early coordination and responses must be included in the NEPA document. Likewise, these must be included in the documentation for state-funded projects that require a Georgia Environmental Policy Act document. The results of early coordination may inform how the project develops through Concept, Preliminary, and Final Design.

SOCIAL ENVIRONMENT SURVEY

For most projects, early in its 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 through 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;
- > 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 to the social environment.

CONCEPT ACTIVITIES

The objective of the Concept Stage 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 attend 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;
- > Public Involvement 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)/6(f) 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.

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 communications 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 one 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. Though, 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.

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 a strong recommended 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 Stage. At this stage, 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 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. An analysis of logical termini is only ever required for projects that involve a federal action. All projects that require Environmental Assessments (EAs) and Environmental Impact Statements (EISs), typically capacity adding projects, as well as trail projects require an analysis of Logical Termini. At the Concept

Stage, the Environmental Analyst should determine if there are concerns with logical termini and if steps should be taken to address these 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 Involvement 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 stage. 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