

Environmental Analysis

Early Coordination

Applicability
Off-site Detour Coordination and Transit
Service Impact
Distribution List Development
Letter Preparation, Review, and Distribution
Responses and Documentation

APPLICABILITY

Through Early Coordination, the Environmental Analyst informs federal, state, local agencies, and other stakeholders of the proposed project. It is initiated early in the Concept Phase to gather information about environmental resources or other concerns in the project area. Typically, the Environmental Analyst initiates this through Early Coordination letters distributed by hardcopy or email to a Distribution List tailored to the project's needs. However, meetings or phone conversations may sometimes be the initiating action.

When Needed

Early Coordination is project specific. 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, the potential for an off-site detour, and the potential for stakeholder interest.

The Environmental Analyst should consider the project's needs and potential for impacts when developing the list of coordination recipients. In general, Early Coordination is needed to do the following:

- > To solicit information about the project area or nearby environmental resources;
- > To bring in coordinating agencies because of the potential for impacts;
- > To notify interested parties of an off-site detour, if one is anticipated;
- > To notify interested parties that right-of-way (ROW) may be required in the project area, if ROW needs are anticipated; and
- > To notify interested parties that may find controversy with the project over such issues as displacements or changes to access.

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 (PCEs), 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.

About Other Environmental Early Coordination

The Environmental Analyst should be aware that other Environmental Subject Matter Experts (SMEs) conduct Early Coordination, or consultation, for their 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. Additionally, other GDOT offices such as Office of Program Delivery (OPD) or the Office of Bridge Design and Maintenance may perform agency or stakeholder coordination that should be verified by the Environmental Analyst to minimize redundancy.

OFF-SITE DETOUR COORDINATION AND TRANSIT SERVICE IMPACT

For projects with a proposed off-site detour or impacts to transit stops/stations, the Project Manager (PM) must coordinate with the following:

- > Local emergency services;
- > Local school district;
- > Local city and/or county government; and
- > Local transit (such as MARTA) or university bus service, if present along the corridor.

Concerning detours, this coordination ensures that the impact of the proposed detour is minimal and other possible solutions have been considered. A detour map should be included with the letter if available. Concerning transit stops and stations, this coordination ensures that impacts are minimized and mitigated as the project advances.

Generally, the PM handles this coordination through district and area office personnel as part of the Concept Phase activities. The Environmental Analyst should reach out to the PM during this phase to document this coordination by including it in the environmental project file with the other Early Coordination letters and responses. If it was not completed during this phase or if the need for a detour was determined in a later phase, the Environmental Analyst should notify the PM about the need for the coordination. In situations where no coordination occurred, the Environmental Analyst may assist the PM with this coordination or would perform themselves so as the project file is complete.

DISTRIBUTION LIST DEVELOPMENT

The Environmental Analyst must first develop a Distribution List of Early Coordination recipients. A Distribution List is available on the OES SharePoint site to aid development of this list with up-to-date contact information and links to aid development of this list. Using the questions, hyperlinks, and other resources within the spreadsheet, the Environmental Analyst should be able to identify which contacts to include as an Early Coordination recipient.

Depending on the proposed project, its funding, and its potential for impacts, certain recipients should be considered for Early Coordination. Below each recipient, there is a contact title and a rationale *in italics*. If the project does not fit within the rationale, then coordination is not required.

Federal and State Agencies

The Environmental Analyst will prepare Early Coordination for the following recipients using the State and Federal Agency Early Coordination template. Some adjustments to the template may be necessary. On occasion, the project's location may have a private organization host annual events such as a cycling road race, marathon, festival (as examples) that may need coordination.

Federal Agencies

- > US Environmental Protection Agency – Contact: Section Chief, Strategic Programs Office. *Only for EA/EIS level projects. CE level projects need to be added to the "Tracking CE Level Projects for EPA" spreadsheet on SharePoint, updated by the OES Environmental Analyst. Note: Include a request for information regarding disadvantaged or Environmental Justice (EJ) communities within the letter.*
- > US Department of Housing and Urban Development – Contact: Regional Environmental Officer, Regional Office of Environment. *If the project includes a large number of displacements within an EJ community. Note: Include a request for information regarding disadvantaged or EJ communities within the letter.*
- > Tennessee Valley Authority – Contact: External Affairs Chief. *Only if the project is located in Catoosa, Dade, Fannin, Rabun, Towns, Union, or Walker Counties.*

State Agencies

- > Georgia Department of Natural Resources (GADNR), Coastal Resources Division – Contact: Director Coastal Resources Division. *If the project is located in Brantley, Bryan, Camden, Charlton, Chatham, Effingham, Glynn, Liberty, Long, McIntosh, and Wayne Counties. Note: The Environmental Analyst should check with the Ecologist to ensure any necessary coordination is conducted.*

- > Georgia Forestry Commission – Contact: Urban & Community Forester Program Coordinator. *If the project converts a significant amount of forest land, either public or privately owned or would involve the Bartram Forest (Baldwin/Wilkinson Counties), Broxton Rocks Forest (Coffee County), Dawson Forest (Dawson County), Dixon Memorial State Forest (Ware/Brantley Counties), Hightower Forest (Dawson County), Paulding Forest (Paulding County), and Spirit Creek Forest (Richmond County).* Note: Include GDOT’s State Agronomist Manager/Arborist in coordination. Additionally, GDOT may involve the commission when timber harvesting large areas of GDOT ROW.

Cooperating Federal Agencies with Federal Lands

GDOT coordinates with the agencies listed below if their properties or facilities are within the project area. If the project requires the use of federal lands managed by one of these agencies, 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, the federal agencies may have specific NEPA requirements, and discussion should begin as early as possible.

The Environmental Analyst should adapt the State and Federal Early Coordination template to reference the property or facilities within the project area. Following this coordination, the project team will continue to coordinate with the agency about potential impacts and use of federal lands.

- > US Forest Service (USFS) – Contact: the USFS District Office responsible for the land potentially affected by the project.
- > US Army Corps of Engineers (USACE) – Contact: Use the dedicated esubmittal address “esubmittal@usace.army.mil” for assignment. Note: 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 through the Environmental Analyst. GDOT has a USACE real estate outgrant MOU which directs the PM to coordinate with USACE during the Concept Phase. The Environmental Analyst should coordinate with the PM to ensure this occurs.
- > Department of Defense – Contact: Begin by contacting the ranking officer in charge of the affected property and, if a military base, include the lead for their Directorate of Public Works.
- > National Park Service (NPS) – Contact: Begin by contacting the affected NPS park. Additional coordination will occur throughout the project following the requirements of Director’s Order #87D.
- > Center for Disease Control – Contact: Director of the National Center for Environmental Health and the Agency for Toxic Substances and Disease Registry if property might be affected by the project.

Special Agency Coordination

Some Early Coordination is conducted only under specific project circumstances and by following a particular process. The recipients discussed below may have different requirements for Early Coordination letters and attachments. Additionally, the coordination may be handled by another office within GDOT, and the Environmental Analyst may only be required to document the coordination.

- > **Farmland: National Resource Conservation Service (NRCS) – *If the project is federal aid and requires ROW or permanent easement.*** Contact: The NRCS Georgia Inventory Coordinator. The Environmental Analyst should use an email template available on the SharePoint site with detailed instructions to convey the necessary information. The coordination should include the pdf letter, environmental survey boundary (ESB), and a project location map. NRCS will respond with a determination if the project requires additional coordination, such as the completion of a Farmland Conversion Impact Rating Form. The Farmland Conversion Impact Rating Form requires the GDOT Environmental Analyst to sign prior to NRCS submittal (acting as the FHWA representative).
- > **Floodplain: GADNR Environmental Protection Division – *If the project is in a floodplain as defined by the Flood Insurance Rate Map.*** Contact: State Floodplain Management Coordinator. The Environmental Analyst should use an email template available on the SharePoint site with detailed instructions to convey the necessary information. Note: Other floodplain and floodway coordination may be required for the project, but this usually occurs after the Hydraulic and Hydrologic Study is completed if needed. The Environmental Analyst should work with the PM and the coordinating office to include this coordination in the environmental document, if required.
- > **Land Water Conservation Fund (LWCF): GADNR State Parks, Recreation & Historic Sites. *If an outdoor recreation area is located within the project area.*** Contact: State Liaison Officer (SLO). The Early Coordination letter should include an ESB and request if LWCF funds were at the outdoor recreation area. Note: The SLO will provide a response within 30 days by the terms of the GDOT-GADNR Interagency Agreement.
- > **GADNR Boat Ramp: GADNR State Parks, Recreation & Historic Sites. *If a project proposes impacts to a GADNR Boat Ramp.*** Contact: GADNR Boating Access Coordinator. Similar to detour coordination, the Environmental Analyst should confirm with the PM that coordination has been initiated following the interagency agreement regarding boat ramps. Depending on the outcome of coordination, some environmental commitments or environmental documentation may be required.
- > **Hurricane Evacuation Routes: Georgia Emergency Management Agency (GEMA). *If a project proposes impacts to a potential hurricane evacuation route for an extended period with single or full lane closures.*** Similar to detour coordination, the

Environmental Analyst should confirm with the PM that coordination has been initiated. Depending on the outcome of coordination, some environmental commitments or environmental documentation may be required.

- > **Navigable Waters Coordination:** US Coast Guard via the Federal Highway Administration (FHWA). *If the project replaces a bridge over a navigable water (or a water that might be considered a navigable water).* The Environmental Analyst coordinates with the PM and the GDOT Bridge Office for this coordination. It involves the preparation of a Coast Guard Bridge Project Questionnaire, submitted to FHWA for review. Following this, FHWA decides whether the US Coast Guard requires coordination, and this may also result in the need for a Coast Guard Permit.

Local Governments and Agencies

The Environmental Analyst should coordinate with local agencies and governments on every project unless no ROW is required, there is no offsite detour, or minimal controversy is anticipated. For Early Coordination with these agencies and governments use the Local Governments and Agencies Early Coordination template. If there is a specific resource that requires additional coordination, the letter template may need to be adapted to address the issue (e.g. Section 4(f) concerning a city park).

The Distribution List spreadsheet includes hyperlinks to websites that will aid in the identification of up-to-date contacts for these governments and agencies.

- > **Regional Commission** – The state is divided into 12 regions, and each regional commission provides regional planning, public administration, and technical resources to aid the advancement of state and regional priorities. Contact: Use the Georgia Association of Regional Commissions website to identify the appropriate contact.
- > **Metropolitan Planning Organizations (MPOs)** – There are 15 MPOs in Georgia encompassing the state’s major cities and metro areas. MPOs aid coordination within metro areas concerning issues relative to local, state, and federal policies and required transportation planning activities. Contact: Use the Georgia Association of Metropolitan Organizations website to identify the appropriate contact.
- > **County Commissions** – Contact: Use the Association County Commissioners of Georgia website to identify the appropriate contact for the commissioners in the project’s county.
- > **Municipal Governments** – *If the project is within a city’s limits, coordinate with the municipal government.* Contact: Use the Georgia Municipal Association website to identify the appropriate contact, typically the mayor’s office.

Additional Stakeholders

Additional stakeholders may include places of worship, institutions, and community groups, such as home-owners' associations, along the project corridor. If the potential for impacts is high, the Environmental Analyst may conduct Early Coordination with these stakeholders. Alternatively, if potential impacts are minimal or unlikely, the Environmental Analyst may simply contact these stakeholders ahead of public outreach—allowing these stakeholders to voice their concerns at the same time as the public.

To identify these stakeholders, the Environmental Analyst should use online tools and project corridor surveys. Stakeholders may include organizations that host events on the transportation facility, such as a festival or road race. Also, local agencies and governments may respond to Early Coordination with contact information for potential stakeholders. Lastly, the District Planning and Programming Liaison or the GDOT Area office is a good resource to help identify these stakeholders.

The Environmental Analyst should use the Local Governments and Agencies Early Coordination template and adapt it as needed.

LETTER PREPARATION, REVIEW, AND DISTRIBUTION

The Early Coordination templates and the Distribution List spreadsheet are available on the Environmental SharePoint Site. The Environmental Analyst will draft the Early Coordination letters after identifying the selected recipients using the list. In some cases, the language in the letter templates must be tailored to the needs of the Early Coordination recipients to ensure meaningful participation.

For contacts identified as State and Federal Agencies, the Environmental Analyst should prepare their letters using the State and Federal Early Coordination template. Likewise, for contacts identified as Local Governments and Agencies, the Environmental Analyst should prepare their letters using the Local Governments and Agencies Early Coordination template. Typically, Additional Stakeholders will use this template as well. The mail merge feature in MS Word helps prepare these letters using the selected contacts in the Distribution List spreadsheet.

Once the contacts are identified in the Distribution List and the letters are drafted, they can be submitted for review. A GDOT Environmental Analysis Team Leader provides the State Environmental Administrator's 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. Some contacts, such as the Floodplain Coordinator for GADNR, will receive Early Coordination specifically tailored to their coordination needs. The Distribution List will identify how the Environmental Analyst will distribute the letters.

RESPONSES AND DOCUMENTATION

As noted, the Environmental Analyst may send the letters through email instead of hardcopy. Likewise, responses from the recipients may be provided via email, hardcopy, or phone call. Some recipients may request additional information, a one-on-one meeting with the project team, or notification about any upcoming public involvement. In some cases, a recipient may recommend an additional contact for Early Coordination. The Environmental Analyst and the project team should try to accommodate any reasonable request.

Early Coordination can result in the identification of additional social environment resources, the identification of disadvantaged communities, and even commitments to be included in the Environmental Commitments Table. Some contacts, such as the NRCS contact responding to farmland coordination, may respond with a determination concerning a particular issue that may need to be discussed in the environmental documentation.

Regardless of the responses, the Environmental Analyst who sends the letter is responsible for the documentation of Early Coordination. 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. If appropriate, a phone log may need to be prepared to document Early Coordination recipients who respond by phone. For federal-aid projects, Early Coordination letters and responses must be included in the attachments of the NEPA document (except for PCEs, which only require inclusion in the project file). Early Coordination must also be included in the attachments of environmental documentation for state-funded projects if the project requires such documentation.

Guidebook Revision History

| Revision Description | Relevant Sections | Revision Date |
|----------------------|-------------------|---------------|
| Initial Publication | All | 10/25/2024 |