

Environmental Analysis

Miscellaneous Environmental Considerations

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APPLICABILITY

Throughout a project's development, environmental considerations may arise that are outside of the Social Environment topics but do not fall within the purview the Environmental Subject Matter Experts' (SME) survey reports and technical documentation. When these arise, the Environmental Analyst is responsible for coordinating with designers to avoid and minimize impacts related to these considerations and documenting any related issues. This guidebook details these considerations in an order that roughly matches their order of appearance in environmental documentation.

HISTORIC MARKERS

Historic markers are signs that describe important events that occurred nearby. Often, they appear near transportation projects. The Environmental Analyst must identify historic markers found along project corridors. If the proposed project will involve historic markers, the project team typically uses special provisions to detail storage of historic markers during construction and their replacement at the project's completion. This is the case for state-funded and federal-aid projects. Environmental documentation, such as Categorical Exclusions (CEs), Environmental Assessments (EAs) and Environmental Impact Statements (EISs), discuss historic markers in the Cultural Resources section.

The Digital Library of Georgia maintains a list of historic markers in Georgia:

WILD AND SCENIC RIVERS

The Wild and Scenic Rivers Act designates rivers included in the National Wild and Scenic River System and designates rivers under studies for inclusion in the system. There is only one Wild and Scenic River in Georgia: the Chattooga River in Rabun County. Its protection is managed by the US Forest Service (USFS). The St. Mary's River on the Georgia-Florida border in Charlton and Camden County is a Wild and Scenic study river. The study was conducted by the National Park Service (NPS), but it has not been formally accepted into the system.

In accordance with the Wild and Scenic Rivers Act, if a federal-aid project has foreseeable adverse effects on a river on the National Wild and Scenic River System or a river under study for designation to the National Wild and Scenic River System then alternatives must be considered to avoid and minimize impacts to these rivers. Adverse effects include alteration of the free-flowing nature of the river, alteration of the setting, or deterioration of water quality. If it is determined that any of the alternatives could adversely affect the qualities for which a listed river was designated or foreclose the designation of a study river by adversely affecting its qualities, development of the project must include coordination with the river's management agency to avoid, minimize, or mitigate the impacts.

The National Environmental Policy Act (NEPA) document should identify early coordination undertaken with the agency responsible for managing the listed or study river (USFS for the Chattooga River and NPS for the St. Mary's River). It should detail coordination taken during the project's development to avoid, minimize, or mitigate the impacts.

Publicly-owned waters designated as Wild and Scenic Rivers are protected by Section 4(f) of the US Department of Transportation Act. Additionally, public lands adjacent to a Wild and Scenic River may be subject to Section 4(f) protection. Much of the Chattooga River is publicly-owned because it is within the Chattahoochee National Forest, and some areas of the St. Mary's River are within the Okefenokee National Refuge. An examination of any adopted or proposed management plan for a listed river will be helpful in making the determination on the applicability of Section 4(f). For each alternative that takes such land, coordination with the agency responsible for managing the river (e.g., NPS or USFS) will provide information on the management plan, specific affected land uses, and any necessary Section 4(f) coordination.

FLOODPLAINS

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practical alternative. All GDOT projects should be evaluated for floodplain impacts. Steps

for following OES's procedures related to floodplains are detailed in the Floodplain Guidance:

Floodplain Guidance, GDOT Office of Environmental Services

FARMLAND

Under the Farmland Protection Policy Act (FPPA), the Environmental Analyst must coordinate with the National Resource Conservation Service (NRCS) for federal-aid projects for possible impacts to prime or unique farmland. Coordination is required for any federal-aid project that requires right of way (ROW) or permanent easement. State-funded projects do not fall under FPPA and so coordination with the NRCS is not required for state-funded projects, and this is true even if the state-funded project requires a federal permit.

Steps in Coordinating with the NRCS:

1. Either the Consultant or the OES Environmental Analyst emails a signed early coordination letter, project location map, and environmental survey boundary (ESB) map or project footprint to the NRCS Georgia Inventory Coordinator.
2. The NRCS Georgia Inventory Coordinator will notify the Environmental Analyst whether an AD-1006 or NCRS-CPA-106 Farmland Conversion Impact Rating Form must be prepared or if the project is exempt from further coordination. The NCRS-CPA-106 form is prepared for linear projects whereas the AD-1006 is prepared for non-linear projects such as intersection improvements and bridge replacements.
3. If the NRCS determines that the project is exempt, the Environmental Analyst saves the correspondence in the project file. For CE, EA, and EIS Projects, the correspondence should be included in the NEPA document.
4. If the NRCS determines that an AD-1006 or NCRS-CPA-106 Farmland Conversion Impact Rating form is required, the Environmental Analyst completes Sections I and III of the applicable form.
5. The OES Environmental Analyst (not the Consultant Environmental Analyst) then emails the form with Sections I and III completed to the Assistant State Soil Scientist with the NRCS.
6. NRCS completes Sections II, IV, and V of within 10 business days and emails it to the OES Environmental Analyst. Upon completion of Parts II, IV, and V, the responsibility of NRCS is fulfilled. No further coordination with NRCS is required.
7. The Environmental Analyst then completes Sections VI and VII of the Conversion Rating Form and signs it.

- a. The OES Environmental Analyst routes a courtesy copy of the completed Rating Form to the Assistant State Soil Scientist with the NRCS.
 - b. If the total points on the Rating Form are less than 160, no alternatives to reduce farmland impacts need to be considered. The completed Rating Form and Correspondence are placed in the project file and included and referenced appropriately in the NEPA document.
 - c. If the total points on the Conversion Rating Form are between 160 and 220, at least two farmland minimization alternatives must be evaluated and the one with the lowest number of points selected unless there are other overriding considerations.
 - The Environmental Analyst (OES or Consultant) will coordinate with the Project Manager (PM) and other Project Team members to develop the two alternatives.
 - FPPA Guidance does not specify that these alternatives necessarily reduce the farmland impacts to under 160 points, only that they reduce impacts relative to the alternative that has been reviewed by the NRCS. That said, reduction to under 160 points would be preferred.
 - The OES Environmental Analyst will involve the Federal Highway Administration (FHWA) Environmental Reviewer in the alternative's evaluation process.
 - GDOT and FHWA will decide whether to designate one of the farmland minimization alternatives as preferred/build or continue forward with the alternative reviewed by the NRCS.
8. Once the preferred/build alternative is selected, the Environmental Analyst will ensure that all correspondence, forms, and other materials related to farmland coordination and to the alternative's selection process are saved to the project file and/or are included and referenced appropriately in the NEPA document.

The NRCS Farmland Conversion Impact Rating Forms and NRCS contacts are on the SharePoint site in the Early Coordination folder.

COASTAL ZONE MANAGEMENT COORDINATION

Coastal Zone Management Coordination applies to federal-aid projects located in counties subject to the Coastal Zone Management Act (CZMA): Brantley, Bryan, Camden, Charlton, Chatham, Effingham, Glynn, Liberty, Long, McIntosh, and Wayne. CZMA requires that the Environmental Analyst notify the responsible state agency of the proposal through this coordination. Generally, coordination would be required for any project that would construct, modify, or remove a public facility (docks, boat ramps, etc.) within the coastal

zone or for any project that would acquire, utilize, or dispose of land within the coastal zone. For GDOT projects, the OES Environmental Analyst (on behalf of FHWA, the federal agency) initiates coordination by sending an early coordination letter to the Georgia Coastal Zone Management of Georgia Department of Natural Resources, Coastal Resources Division (CRD).

The coordination should describe the project's consistency with the state's coastal zone management program. CRD will respond within 45 days (a 15-day extension may be requested). If no response is received, the federal agency will assume that CRD agrees with the finding. Should CRD determine that the project does not minimize impacts to the coastal zone to the maximum extent practicable, the agencies should meet to resolve any issues. If no agreement is made, mediation may be requested from the Secretary of Commerce, and judicial review should be requested as a last resort.

All coordination efforts and resulting actions should be discussed within the environmental document where appropriate, and concurrences and correspondence should be attached.

ENERGY AND MINERAL RESOURCES

For federal-aid projects, the Environmental Analyst must document a project's involvement with energy and mineral resources. Typically, energy and mineral resources related to GDOT's transportation program involve kaolin mining operations. These operations occur along Georgia's "Fall Line," which stretches between Columbus in the west to Augusta in the east. The Environmental Analyst must assess the proposed project to determine if it involves mining operations. Issues that may affect these operations include off-site detours, access changes (such as median installation), and ROW or easement in areas owned or leased for mining.

The Environmental Analyst must coordinate with mining operations potentially affected by the proposed project through coordination and outreach, including early coordination and outreach for public involvement. If ROW or easement affects operations, the Office of Right of Way typically leads coordination with the mining operation. Documentation of the Environmental Analyst's coordination and appropriate ROW coordination must be included in the NEPA document.

Other issues related to energy and mineral resources include the one-time sizeable use of fossil fuels for heavy machinery and other vehicles and electrical requirements. Construction of a transportation project may result in a sizeable one-time increase in the demand for energy supplies. However, this one-time increase should be mitigated by the improved efficiency that the project may create along an existing or new facility. As a result, documentation regarding this aspect of energy and mineral resources is only necessary for projects requiring an EIS.

UNDERGROUND STORAGE TANK AND HAZARDOUS WASTE

For all GDOT projects, if the area of ground disturbance includes areas of potentially hazardous waste and/or Underground Storage Tanks (USTs), the PM requests surveys to identify any contamination concerns. These areas may be within the required ROW or within existing ROW adjacent to properties with high potential for hazardous waste or USTs. The properties are typically gas stations, auto repair facilities, industrial sites, or dry cleaners.

The surveys involve a Phase I Environmental Site Assessment and, if warranted, a Phase II Environmental Site Assessment. The Phase I is an investigation to identify potential sites, and the Phase II is a screening to test those sites for contamination. The investigation and screening may be conducted by GDOT staff (generally district personnel) or a qualified consultant. The results are reviewed and approved by GDOT's Office of Materials and Testing (OMAT). Surveys approved by OMAT provide the location of hazardous waste sites, USTs, areas of contamination, and monitoring wells. These surveys are typically completed prior to ROW acquisition.

The results of Phase I and Phase II Environmental Site Assessment may include construction requirements within or adjacent to areas of soil contamination, including requirements to protect the location of monitoring wells. The Environmental Analyst documents these requirements in the Environmental Commitments Table. For federal-aid projects, the Environmental Analyst documents the project's involvement with hazardous waste and USTs. This documentation includes a summary of results from Phase I Environmental Site Assessment and Phase II Environmental Site Assessment (if warranted) in the NEPA document. Coordination from OMAT, such as approval correspondence, must also be included in the NEPA document.

CLIMATE CHANGE

For federal-aid projects that require an EA or an EIS, a discussion of the project's impacts related to global climate change should be included. Typically, this discussion involves standard language that describes general impacts from transportation projects.

Guidebook Revision History

Revision Description	Relevant Sections	Revision Date
Initial Publication	All	6/8/2021