NWCP
NORTHWEST
CORRIDOR
PROJECT

Record of Decision

May 2013

NORTHWEST CORRIDOR PROJECT

prepared by:
FEDERAL HIGHWAY ADMINISTRATION and
GEORGIA DEPARTMENT OF TRANSPORTATION

CSNHS-0008-00(256), PI No.0008256

Record of Decision

for

Northwest Corridor Project

Project Number CSNHS-0008-00(256)
P.I. # 0008256

Cobb and Cherokee Counties, Georgia

Federal Highway Administration

Georgia Department of Transportation

May 14, 2013

TABLE OF CONTENTS

FIGURES

TABLES

ACRONYMS

AA/DEIS	Alternatives Analysis/Draft Environmental Impact Statement
APA	Administrative Procedures Act
ARC	Atlanta Regional Commission
BRT	Bus Rapid Transit
CEPP	Comprehensive Environmental Protection Program
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DBF	Design, Build, Finance
DDS	Department of Driver Services
ECMP	Environmental Compliance and Mitigation Plan
EIS	Environmental Impact Statement
EJ	Environmental Justice
ETL	Express Toll Lane
FEIS	Final Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GDNR/WRD	Georgia Department of Natural Resources/Wildlife Resources Division
GDOT	Georgia Department of Transportation
GRTA	Georgia Regional Transportation Authority
HOT	High Occupancy Toll
HOT3+	High Occupancy Toll with Three or More Persons
HOV	High Occupancy Vehicle
LOS	Level of Service
LRT	Light Rail Transit
MSAT	Mobile Source Air Toxics
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NOA	Notice of Availability
NOI	Notice of Intent
NRHP	National Register of Historic Places
NWCP	Northwest Corridor Project
P3	Public-Private Partnership
ROD	Record of Decision
RTP	Regional Transportation Plan
SAFETEA-LU	Safe, Accountable, Flexible, Efficient, Transportation Equity Act
SDEIS	Supplemental Draft Environmental Impact Statement
SHPO	State Historic Preservation Officer
SOV	Single Occupancy Vehicle
SP	Special Provision
SRTA	State Road and Tollway Authority
TIFIA	Transportation Infrastructure Finance and Innovation Act
TOL	Truck-Only Lanes
TOT	Truck Only Toll
TSM	Transportation System Management
USACE	United States Army Corps of Engineers

USC	United States Code
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service

RECORD OF DECISION

CSNHS-0008-00(256)
P.I. #0008256

Cobb and Cherokee Counties
I-75 / I-575 Northwest Corridor Project

1.0 Decision

This document records the decision for the proposed Interstate 75 / Interstate 575 Northwest Corridor Project (NWCP) in Cobb and Cherokee Counties, Georgia. The project is included in the Atlanta Regional Commission's (ARC) *PLAN 2040* FY 2012-2017 Transportation Improvement Plan as ARC Project AR-ML-930 and P.I. #0008256.

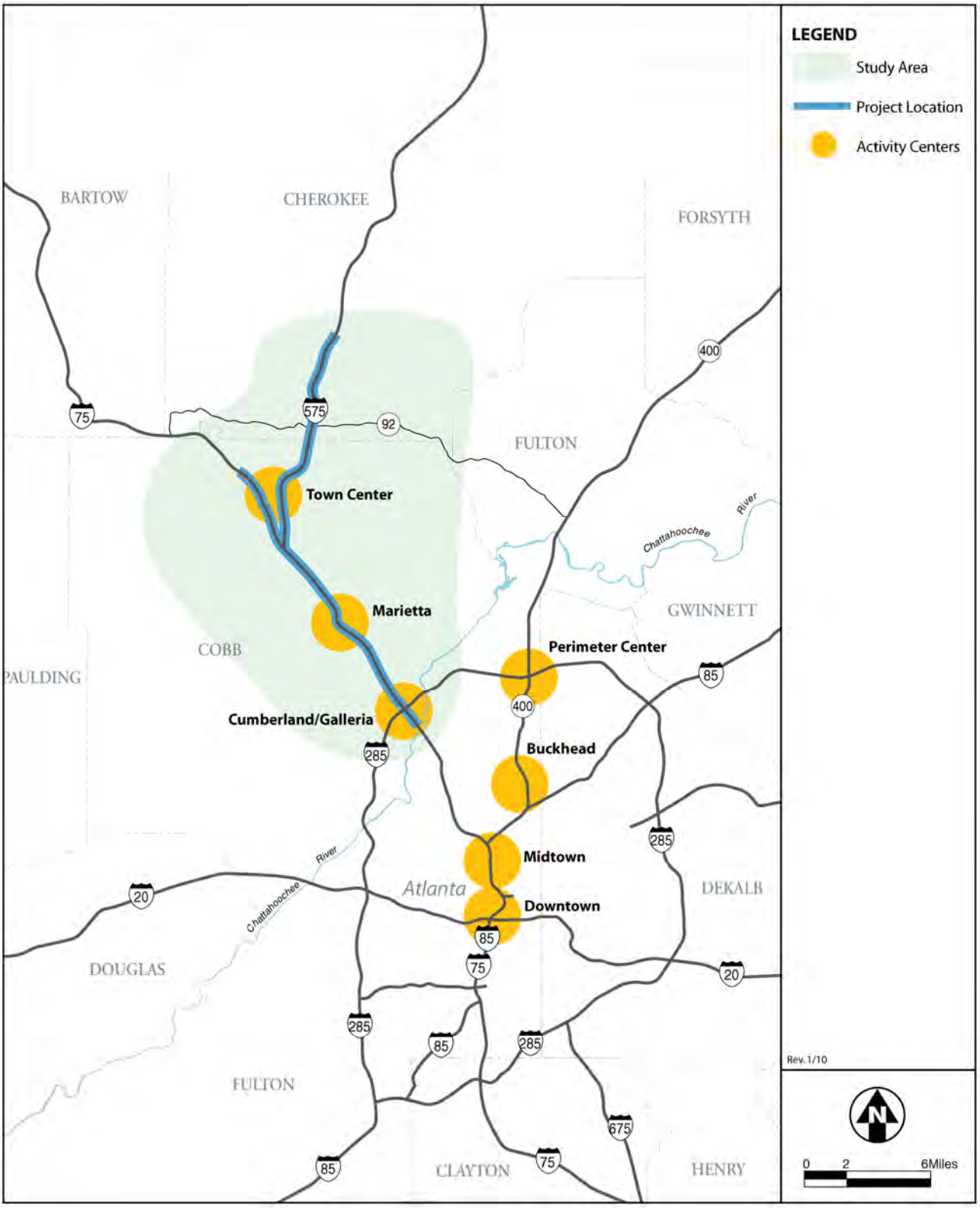
In accordance with the National Environmental Policy Act (NEPA) and the requirements set by the Council on Environmental Quality (CEQ) (40 CFR [*Code of Federal Regulations*] 1505.2), this Record of Decision (ROD) also summarizes the following:

- Alternatives considered for the proposed project by the Georgia Department of Transportation (GDOT) and the Federal Highway Administration (FHWA) and the basis for selection, description, cost estimates, and impacts of the Selected Alternative;
- The Section 4(f) statement;
- Measures adopted to avoid and minimize harm;
- Monitoring and enforcement programs for implementation of mitigation measures; and
- Public and agency comments on the March 2013 Final Environmental Impact Statement (FEIS) Reevaluation and the October 2011 FEIS.

The NWCP is located in the Atlanta metropolitan area, northwest of downtown Atlanta and it specifically encompasses portions of Cobb and Cherokee Counties (see Figure 1-1). Within the project area, I-75 extends to the northwest from downtown Atlanta. The project corridor begins on I-75 at Akers Mill Road south of I-285 in Cobb County and extends northwesterly through the suburban cities of Smyrna, Marietta, Kennesaw, and Acworth. The corridor also extends through several unincorporated communities in Cobb County. Within the project area, I-575 branches northeasterly from I-75 and extends into Cherokee County and the cities of Woodstock and Holly Springs. The project area is home to a substantial share of the region's population as well as several major business centers; two large regional shopping malls; Dobbins Air Reserve Base; a large Lockheed Martin aircraft facility; two universities; a county airport; and numerous major corporations.

A major north-south route through Georgia, I-75 is also the primary route for commuters traveling to jobs within the project area as well as in the region, especially to Midtown,

Figure 1-1 Project Location



downtown Atlanta, Buckhead, and Perimeter Center. It also serves the transportation needs for regional travel and freight trucking. In downtown Atlanta, I-75 merges with I-85. Leaving I-85, it proceeds northwesterly as a 10- to 12-lane highway to I-285, which is the beltway around Atlanta. North of I-285, the number of lanes on I-75 varies from 6 to 15. Farther to the north in Cobb County, I-75 connects with the southern terminus of I-575, which serves Cherokee County. The I-575 corridor traverses northeasterly through a more rural area. Interstate 575 currently consists of four general-purpose lanes, two in each direction.

As documented in Section 1.3 of the 2011 FEIS, transportation improvements are proposed for the Northwest Corridor to meet long-term regional transportation needs. Urban development in Cobb and Cherokee Counties over the past decades has increased traffic congestion on both I-75 and I-575. Mobility has become increasingly difficult and time-consuming for commuters and interstate travelers using I-75 and I-575. The congestion equally affects single occupancy vehicles (SOVs), high occupancy vehicles (HOVs), buses, and commercial vehicles. There also are segments of I-75 and interchanges with substandard design and capacity deficiencies that contribute to congestion and safety concerns. In addition, development in the I-575 corridor is expected to intensify in response to projected long-term increases in both population and employment, which will likely lead to increased traffic congestion.

The purpose of the Northwest Corridor Project is to address the following:

- Reduce congestion;
- Improve mobility by reducing travel time and increasing reliability;
- Improve access by improving connectivity between regional activity centers;
- Improve safety by reducing existing roadway design deficiencies and congestion-related crashes; and
- Reduce vehicle emissions by improving vehicular travel efficiency and increasing the proportion of high capacity vehicles.

The project goals are:

- Improve transportation effectiveness of I-75 and I-575 that also contributes to the improved performance of the regional transportation system;
- Provide additional transportation choices or options to increase the capacity of I-75 and I-575;
- Improve the quality of life by improving mobility and minimizing adverse effects on both natural resources and the built environment;
- Improve transportation equity by providing an equitable distribution of benefits and impacts to all populations; and
- Provide cost-effective and affordable transportation improvements.

The FHWA has evaluated a proposal of GDOT to provide improvements to I-75 and I-575 in Cobb and Cherokee Counties, Georgia. Based upon studies documented in the FEIS and the 2013 FEIS Reevaluation; through an extensive public involvement process; in consultation with other local, State, and Federal agencies; and in accordance with the requirements NEPA, the alternative selected for advancement to the final design and construction phase is identified as the Two-Lane Reversible Alternative. The proposed NWCP will be a two-lane reversible managed-lane roadway along the west side of I-75 from I-285 to I-575 and a one-lane reversible managed-lane roadway in the median of I-75 from I-575 to north of Hickory Grove Road and in the median of I-575 from I-75 to Sixes Road. The lanes will be managed through the use of electronic variable tolling. The Selected Alternative is shown in Figure 1-2.

The NWCP will be delivered through a public-private partnership (P3) procurement. The P3 procurement leverages limited transportation funds through a partnership with the private sector to provide both private investment and innovation. The P3 Developer will be responsible for the final design, construction and initial financing of the project. The State will retain responsibility for operations, maintenance, tolling and long-term financing.

2.0 Project History

The process of developing the NWCP began in 2002 when GDOT initiated a design concept study for the corridor. Below is a brief history of the project. The alternatives discussed in each are described in Section 3.0 History of Alternatives.

2.1 2002 GDOT Design Concept Study

The process of developing the project began when GDOT initiated a *Design Concept Study* in 2002. The GDOT Design Concept Study resulted in the preparation of several studies that examined alternatives for the extension of HOV lanes on both I-75 and I-575.

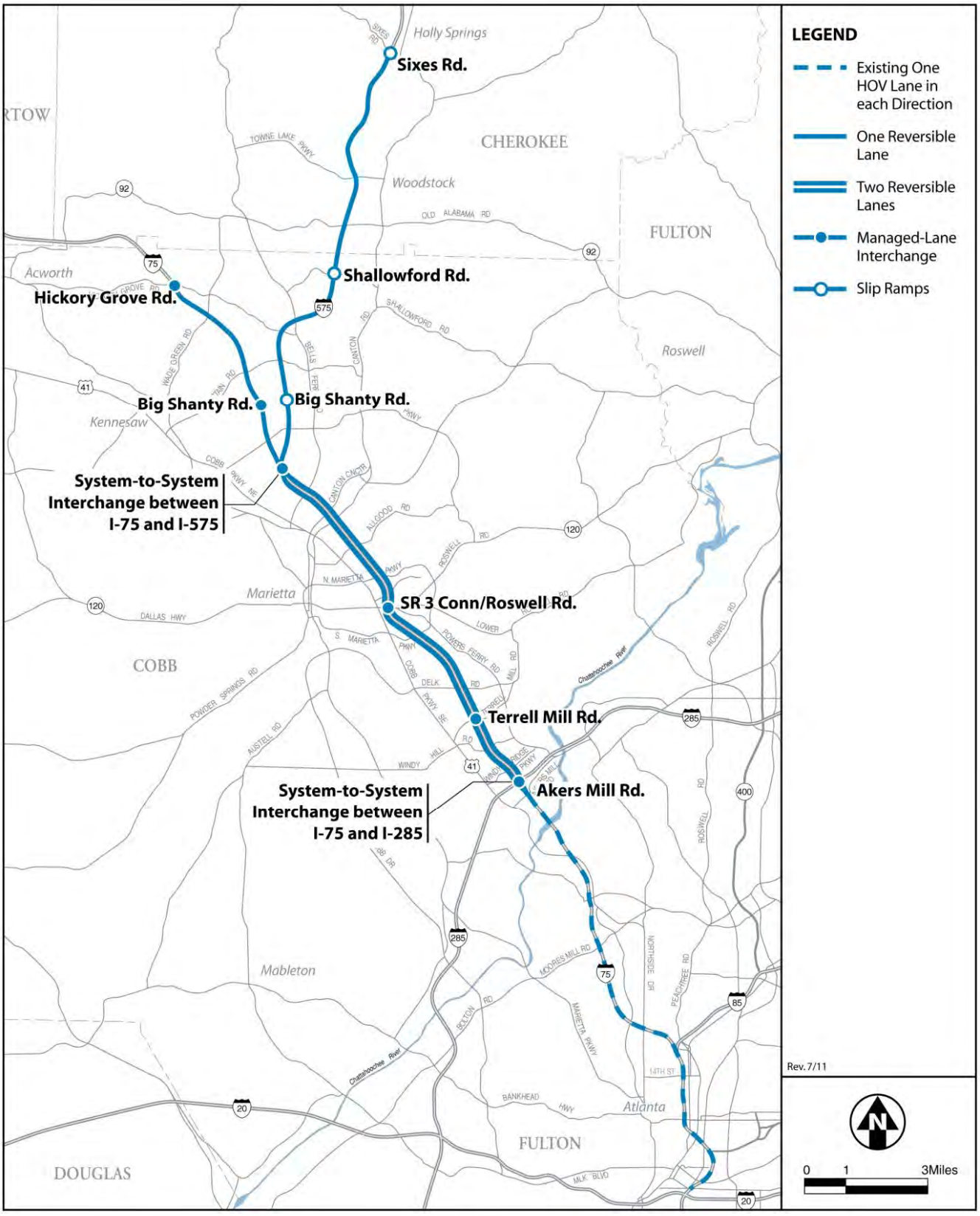
2.2 2004 Georgia Regional Transportation Authority Northwest Connectivity Study

In 2001, the Georgia Regional Transportation Authority (GRTA) initiated the *Northwest Connectivity Study: Conceptual Alternatives Memorandum*. The *Northwest Connectivity Study* identified and evaluated alternative transit modes and alignments between Midtown (Atlanta) in Fulton County and Town Center (Kennesaw) in Cobb County. The study used a three-step process consisting of an initial screening of a list of alternative modes and alignments, an intermediate screening of a list of 11 conceptual alternatives, and a detailed evaluation of three candidate alternatives (A, B and C).

2.3 2007 Alternatives Analysis/Draft Environmental Impact Study (AA/DEIS)

In 2004, a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the combined Northwest Connectivity Study Selected Alternative and the NWCP was published in the *Federal Register.* Coordination for the project, including agency scoping, was initiated with

Figure 1-2 Selected Alternative



an agency scoping meeting in August 2004. Additional agency scoping meetings were held in January 2005 and January 2006. Public Information Open Houses (PIOH) were held for the project in 2004, 2005 and 2006.

The AA/DEIS was released for review in May 2007. The AA/DEIS assessed the No-Build Alternative and four build alternatives. Public hearings for the AA/DEIS were held in May and June 2007.

2.4 2010 Supplemental Draft Environmental Impact Study (SDEIS)

Following publication of the AA/DEIS in May 2007, comments were received from 13 federal, state, and local governments; 19 businesses and organizations; 11 trucking industry representatives; and over 70 individuals.

The comments received on the AA/DEIS addressed three main topics – the design and operation of the alternatives, the environmental impacts, and the financial feasibility of the project. Substantial opposition was expressed concerning the proposed truck-only lanes due primarily to the claim that negligible benefits would be provided and the proposed mandatory use of the tolled facilities. Comments cited that the proposed operating plans for the bus service for both the bus rapid transit (BRT) and Reduced BRT element of the proposed project were unreasonable and provided exceptionally high transit service at a substantial cost to the region. Additional comments expressed concern with the large footprint of the project (including two HOV and two truck only lanes in each direction on I-75) and its substantial adverse impacts on adjacent neighborhoods and property owners. Comments also called attention to the very high cost of construction and the operating costs of all of the proposed build alternatives. Comments considered the proposed project potentially infeasible and/or inappropriate allocation of public funds for the construction and operation of a single transportation project.

Consistent with the substantive comments on the AA/DEIS and reconsideration of the financial feasibility of the alternatives evaluated in the AA/DEIS, GDOT determined that the alternatives for the proposed Northwest Corridor Project evaluated in the AA/DEIS needed to be refined in response to changed conditions.

As GDOT progressed with refining the NWCP in response to comments on the AA/DEIS, the project stakeholders were provided with ongoing opportunities to provide comments. The build alternative was eliminated from consideration in the AA/DEIS. To ensure agencies and members of the public were informed about changes in the proposed project, a SDEIS was prepared to document those changes. The NOI for the SDEIS was published in the *Federal Register* on December 24, 2009. The notice advised interested parties of a new build alternative– the Two-Lane Reversible Alternative. Over 85 agencies, organizations, and stakeholders were invited to participate in a project stakeholder briefing held in January 2010 following the publication of the NOI for the SDEIS.

During the preparation of the SDEIS, the project study team met with civic, business, community, faith-based, minority, low-income, and other special interest groups to provide

information about the project, listen to public concerns, answer questions, and seek continued participation and support. These meetings were held in March and April 2010.

The SDEIS was released for public review in September 2010. The SDEIS assessed the No-Build Alternative and the Two-Lane Reversible Alternative. Public hearings for the SDEIS were held in October 2010.

2.5 2011 Final Environmental Impact Study (FEIS)

Following publication of the SDEIS, GDOT fine-tuned the Two-Lane Reversible Alternative, which was referred to as the Build Alternative in the SDEIS. Minor modifications were made to the project design to further minimize potential impacts, particularly traffic congestion. Additional changes were made to reduce costs based on the completion of the Value Engineering Study (GDOT, 2009b and 2010c) initiated by GDOT.

The FEIS was released for public review in October 2011. The FEIS assessed the No-Build Alternative and the modified Two-Lane Reversible Alternative. Outreach for the FEIS included distribution of a project newsletter and staffed project kiosk events. Small group meetings were held in November 2011 to disclose additional sound barriers that were included in the FEIS but not included in the SDEIS. Comments received on the FEIS are discussed in Section 8.0 and are located in Appendix B.

Post-FEIS outreach for the project was conducted in the summer of 2012. Post-FEIS outreach included the distribution of a project newsletter and several staffed project kiosk events.

2.6 2013 Final Environmental Impact Study Reevaluation

Following the approval of the FEIS in October 2011, several changes to the project occurred. The changes included changes to the financing, operations, maintenance, and tolling aspects of the project and adoption of a new regional transportion plan (PLAN 2040).

Previously, the project was to be delivered under a long-term P3 toll concession strategy. In return, the investors would collect tolls on the new managed lanes and retain some level of control over future improvements in the corridor. Under the new proposed approach, the project will still benefit from the investment and innovation of a P3, while allowing the State to retain more control of this important regional transportation corridor. Under this strategy, known as Design, Build, and Finance (DBF), the private sector will contribute a reduced amount of initial funding and be responsible for design and construction of the project, under the State's oversight. Responsibility for operations, maintenance, tolling, and long-term financing will be retained by the State.

The traffic, noise and air quality analyses for the FEIS were performed using data from ARC's *Envision6* Regional Transporation Plan and associated travel demand forecasting model. This plan and model were updated in 2011. The new regional transportation plan, PLAN 2040, was adopted by ARC on July 27, 2011 and approved by GRTA on August 18, 2011. The FHWA and the Federal Transit Administration (FTA) issued a conformity determination on September 6, 2011.

These changes were analyzed in the 2013 FEIS Reevaluation, which was approved on March 18, 2013, published, distributed and made available for public comment. Comments received on the Reevaluation are discussed in Section 8.0. The comments and responses to the comments are located in Appendix B.

Based on the findings in the 2013 FEIS Reevaluation, it was determined that the FEIS remained a valid assessment of project impacts.

Post-FEIS Reevaluation outreach for the project, in addition to that discussed in Section 2.5, was conducted in the spring of 2013 after publication of the FEIS Reevaluation. Post-FEIS Reevaluation outreach included distribution of a project letter and comment card and sound barrier outreach to property owners and tenants who were identified as not eligible for noise abatement in the SDEIS and the FEIS, but were identified as eligible as a result of additional analysis that was conducted for the FEIS Reevaluation (*Northwest Corridor Project, Noise Technical Report, 2013 Addendum,* Parsons Brinckerhoff, 2013).

The newsletters were distributed via a number of different outlets:

- posting to the project website and Facebook;
- electronically to over 500 entities on the project email list;
- US Postal Service mail to over 1,300 entitities in the project mailing database
- distribution to the public involvement coordinator for the Atlanta Regional Commission; the revive285 project team and other pertinent GDOT project teams; communications staff for the Georgia Regional Transportation Authority, State Road and Tollway Authority and Clean Air Campaign; Town Center CID; Cumberland CID; Cobb and Cherokee Chambers of Commerce; area universities; social service organizations; environmental justice advocates, and community groups for distribution to their respective mailing lists; and
- delivery of paper copy to libraries, government offices, social service organizations, apartment complexes, and churches.

The sound barrier outreach consisted of the mailing of an information packet to property owners and tenants identified as eligible for noise abatement as a result of the additional analysis mentioned above. The information packet consisted of a letter describing the project and noise impact assessment process, a project newsletter, maps depicting the location of the walls, and a stamped GDOT-addressed survey postcard.

3.0 History of Alternatives

As discussed in Section 2.0, the process of developing the project began when GDOT initiated a *Design Concept Study* in 2002 and GRTA initiated the *Northwest Connectivity Study: Conceptual Alternatives Memorandum* in 2001. A number of alternatives were also studied

throughout the project development during the NEPA process. The alternatives evaluated in the studies and the alternatives evaluated in the subsequent EIS documents are described below.

3.1 2002 GDOT Design Concept Study

Additional General-Purpose Lanes

The widening of I-75 to provide for additional roadway capacity through the addition of general purpose lanes for SOVs was eliminated from further consideration. The primary issues were air quality and concerns that congestion would be similar to the No-Build Alternative. Additional general-purpose lanes would not improve air quality nor would they provide a long-term solution to congestion relief. The alternative would not improve mobility because it would not provide more reliable travel times.

High Occupancy Vehicle (HOV) Lanes

Several HOV lane alternatives were considered in the GDOT Design Concept Study. The HOV lane alternative selected for further study included HOV lanes on I-75. The limits of the alternative began at the Akers Mill Road interchange south of I-285 where the existing HOV lanes terminate. The design included two HOV lanes in each direction north to the I-75 / I-575 interchange and one barrier-separated HOV lane in each direction north of the I-75/I-575 interchange to the Wade Green Road interchange on I-75 and north to the Sixes Road interchange on I-575.

Under the HOV lanes alternatives, GDOT considered two options for achieving separation of the managed lanes from the general purpose lanes – buffer and barrier. Buffer-separated lanes would be accomplished by use of pavement markings, while barrier-separated lanes would use physical barriers such as walls, pylons or grade separation. Maintaining service levels in the HOV lanes for users and a competitive travel time by transit are necessary to improve mobility in the corridor. Buffer-separated lanes would not produce the same mobility benefits as barrier-separated lanes because they would reduce the reliability of traveling in the HOV lanes and increase travel times for HOV and transit users. Use of barrier-separated lanes is also important for managing traffic flow in high occupancy toll (HOT) lanes. Thus, the option of buffer-separated HOV lanes alternative was eliminated from further consideration since it would not meet the purpose and need of the project.

Transportation Systems Management Improvements

While GDOT was evaluating the HOV lane alternative, studies also were conducted to determine if transportation system management (TSM) highway improvements could meet future traffic demand without construction of the HOV lanes. TSM highway improvements typically include features designed to improve traffic operations and maximize the efficiency of the highway network without substantial capital expenditure. As such, TSM improvements can include upgrading existing parallel arterial roadways, ramp metering, auxiliary lanes between interchanges, and enhancement of bus service in the corridor. At the time, the *Mobility 2030, Volume I: Regional Transportation Plan* (RTP) (Atlanta Regional Commission, 2004) proposed a number of TSM improvements that included operational improvements on US 41 (Cobb Parkway), ramp metering, and collector-distributor system improvements that were planned for I-75. Transit service improvements also were planned. The traffic analysis conducted

concluded, however, that implementation of these types of transportation projects alone without the proposed HOV lanes would provide no improvement in mobility compared to the No-Build Alternative. As a result, the TSM alternative as a stand-alone alternative was eliminated from further consideration.

3.2 2004 GRTA Northwest Connectivity Study

Alternative A: Express Bus/HOV Alternative

This alternative represented a refinement of two conceptual alternatives (2 and 4). Express buses would operate in the existing and proposed extended HOV lanes along I-75 from the Metropolitan Atlanta Rapid Transit Authority (MARTA) Arts Center Station, downtown (Atlanta), Midtown (Atlanta), and north to the existing Busbee park-and-ride lot near Town Center (Kennesaw). Alternative A rated third and was identified to have the fewest and least intensive environmental impacts. It was found to have the lowest cost because the HOV lanes already exist south of I-285 and they would be built north of I-285 in conjunction with the proposed extension of the HOV lanes on I-75. This alternative also was determined to be the most cost effective. It was determined that by using the existing HOV lanes on I-75 south of I-285, Alternative A would achieve almost the same benefits as Alternative C, but at a substantially lower cost. Alternative A, Express Bus/HOV, was selected as the Locally Preferred Alternative (LPA) based on its achievement of the study goals and objectives, cost effectiveness, and lowest potential impact on the environment. In 2004, the GRTA Board adopted Alternative A as the LPA, describing it as “a bus rapid transit facility operating within high-occupancy vehicle (HOV) lanes along I-75 with associated stations and a coordinated bus [service],” and thus upgraded the mode from express bus to BRT.

Alternative B: LRT

This alternative represented a refinement of one of three light rail transit (LRT) alternatives considered. The refinements consisted of truncating the rail service at North Marietta Parkway and changing station locations to better serve adjoining communities. LRT would be routed from the MARTA North Avenue Station north along Northside Drive, I-285, I-75, and North Marietta Parkway in Marietta. Alternative B, LRT, rated second. Alternative B was found to have the highest cost because of the additional rail system elements required for light rail, such as electrification and signaling, and was determined to be the least cost effective.

Alternative C: BRT/HOV

Alternative C represented a refinement and combination of two alternatives. In this Alternative, BRT would operate from the MARTA Arts Center Station north along Northside Drive, I-285, US 41 and I-75, terminating in Kennesaw. Alternative C was the highest rated with respect to overall goal achievement but was identified to have the most concerns for potential environmental impacts.

3.3 The 2007 Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS)

No-Build Alternative

The No-Build Alternative included all existing highway and transit services and facilities within the Northwest Corridor and the remainder of the region. It also included the planned regional long-range improvements for the area outside the Northwest Corridor, except for the planned managed-lane improvements for I-285 North, I-285 West and I-20 West. The two I-285 projects and the I-20 West project are managed-lane projects and they would be expected to increase usage of the proposed managed lanes on I-75. They were excluded from the No-Build because they influence the traffic operation benefits of the proposed improvements to I-75 and there was risk that implementation of these improvements may not occur as planned.

Build Alternatives

Each build alternative included existing transportation facilities and services as well as those improvements that were programmed in the long range transportation plan. Each of the four build alternatives provided for the extension of the HOV lanes on I-75 and I-575, and the addition of truck only lanes (TOL) on I-75. The TOL and HOV lanes would essentially be the same throughout the I-75 and I-575 corridor under all of the build alternatives. The primary difference among the AA/DEIS build alternatives was the type and level of transit improvements that would have been included under each alternative, e.g., bus frequency, types of passenger facilities, location and size of park-and-ride lots, and number and type of transit vehicles. The four AA/DEIS build alternatives were distinguished by the following characteristics:

- The **HOV/TOL Alternative** provided for only a minimum expansion of transit service in the corridor in addition to the transit improvements committed in the Transportation Improvement Plan (TIP). This alternative would have provided GDOT with the ability to advance the HOV/TOL element of the project with only minimal transit improvements.
- The **HOV/TOL/TSM Alternative** was a lower-cost transit alternative compared to the other transit alternatives. It included a major expansion of express bus service operating in the HOV lanes with supporting transit facility improvements, such as park-and-ride lots and bus transfer facilities.
- The **HOV/TOL/BRT Alternative** served the same travel markets as the HOV/TOL/TSM Alternative, but with five bus rapid transit (BRT) stations located at proposed special HOV interchanges on I-75 where vehicles would have direct access to the HOV lanes.
- The **HOV/TOL/Reduced BRT Alternative** was a reduced-cost version of the HOV/TOL/BRT Alternative with only three stations along the I-75 corridor. It was intended as the first phase of the BRT system in the event funding was not available for the five-station HOV/TOL/BRT Alternative.

In addition to the design options, two operational options were considered for the AA/DEIS build alternatives:

- High Occupancy Toll (HOT) Lane Option that would allow SOV use of the HOV lanes by paying a toll.

Truck Only Toll (TOT) Lane Option that would require truck operators to pay a toll. The TOT lanes could be mandatory or voluntary for heavy duty through trucks. Following publication of the AA/DEIS in May 2007, a number of external factors and project milestones occurred that affected decisions regarding the alternatives under consideration. These changed conditions included:

- The GDOT's review of comments on the AA/DEIS identified substantial opposition and concern over anticipated cost to construct and operate the alternatives proposed in the AA/DEIS, the potential impacts due to the wide project footprint, and the mandatory tolls being considered for the TOLs.
- The national economy entered into a recession and GDOT determined there were curtailed funding options for the four build alternatives. In addition, the economic conditions would affect the amount of money available to construct any transportation improvements in the Northwest Corridor.
- In April 2008 GDOT completed a statewide truck lanes needs identification study that concluded TOLs in metro Atlanta were not financially feasible.
- The ARC updated its Travel Demand Forecasting Model in 2008, which replaced the computer model used to conduct the traffic analysis presented in the AA/DEIS. The 2008 model indicated stronger directional flows during peak commute periods, which indicated potential opportunities to implement a reversible managed-lane system, not just a bi-directional managed-lane system. A reversible managed-lane system would allow the number of lanes to be reduced in half by adding highway capacity to serve only the peak period major direction of traffic flow.

As a result, a SDEIS was prepared.

3.4 The 2010 Supplemental Draft Environmental Impact Statement (SDEIS)

No-Build Alternative

The No-Build Alternative included all existing highway and transit services and facilities within the Northwest Corridor and the remainder of the region. It also included the planned regional long range improvements for the area outside the Northwest Corridor, except for the planned managed-lane improvements for I-285 North, I-285 West and I-20 West. The two I-285 projects and the I-20 West project were excluded from the No-Build because they were expected to influence the traffic operation benefits of the proposed improvements to I-75 and there was risk that implementation of these improvements may not occur as planned.

Two-Lane Reversible Build Alternative

As a result of the changed conditions following the AA/DEIS, GDOT decided to eliminate the TOL and the BRT elements of the build alternatives evaluated in the AA/DEIS, leaving only the HOV lane element of the project. Based on an analysis of three different managed-lane concepts using the ARC 2008 Travel Demand Forecasting Model, the Two-Lane Reversible Alternative was developed (*Northwest Corridor Project Traffic Technical Report*, Parsons

Brinckerhoff, 2010). This alternative consists of two reversible (one-direction) lanes operating on I-75 between I-285 and I-575 and single reversible lanes northward to Hickory Grove Road on I-75 and Sixes Road on I-575. The concept for the Two-Lane Reversible Alternative is consistent with the GDOT 2009 adopted regional managed lane system plan. This plan provides motorists with improved level of service (LOS) (i.e., less congestion) on the proposed managed-lane system to encourage people to carpool and shift away from use of the general-purpose lanes (SDEIS, Section 4.3.5). Under this alternative, the tolling policy for the proposed managed lanes would be structured to provide opportunities for increased transportation mobility for users.

Tolling

It was acknowledged in the SDEIS that operation of the managed-lane system would involve tolling users (SDEIS, Section 2.4.2). Various policies were under consideration for implementation. The policies considered which vehicles would be tolled based on type, occupancy, highway segment, time of day, and potentially existing congestion conditions on the managed-lane system. Based on preliminary analyses, it appeared that an express toll lane (ETL) tolling policy may be implemented because it could significantly reduce the State's share of the initial cost of the project compared to another commonly used tolling policy, the high-occupancy-toll with three or more persons (HOT3+) tolling policy. Under the ETL tolling policy, vehicles using the managed lanes would pay a toll regardless of occupancy. Registered regional transit vehicles and authorized emergency vehicles would be able to use the facility toll-free. Under a HOT3+ tolling policy, vehicles with three or more persons, including registered transit vehicles, would also use the managed lanes for free. An ETL tolling policy would also reduce the risk of lost revenue and reduce the cost of enforcement.

3.5 The 2011 Final Environmental Impact Statement (FEIS)

No-Build Alternative

The No-Build Alternative considered in the FEIS is the same as investigated in the SDEIS, as described above.

Two-Lane Reversible Alternative

Following publication of the SDEIS, GDOT fine-tuned the Two-Lane Reversible Alternative. Minor modifications to the project design were made to further minimize potential impacts, particularly traffic congestion. These minor modifications included:

- Adding an auxiliary travel lane on I-75 northbound for approximately 2,000 feet to facilitate northbound managed-lane traffic merging with the general-purpose lanes at the northern termini. On I-575 northbound an improvement was added to extend the managed lane north to the Sixes Road interchange as a third general purpose lane. At Sixes Road the northbound off-ramp is improved to two lanes with the outside lane dropping to the off-ramp and the middle lane being an optional exit. Two general purpose lanes then extend northbound from the Sixes Road interchange,

- Adding two approach lanes on the ramps and single left turn lanes on the arterial at the Terrell Mill, Big Shanty Road and Hickory Grove Road managed-lane interchanges. At Roswell Road two approach lanes were required on the ramps and dual left turn lanes on Roswell Road in both directions. The FEIS identifies a restriping plan for Roswell road that accommodates the dual left turn lanes, and
- Reconfiguring and relocating the Freys Gin Road, Roswell Road intersection adjacent to the managed-lane interchange to align with Hagood Circle.

Additional changes shifting the horizontal and vertical alignment of the managed-lane system south of I-575 were made to reduce costs based on the completion of the Value Engineering Study (GDOT, 2009b and 2010b).

GDOT subsequently identified the modified SDEIS Build Alternative as the project's Preferred Alternative because it was substantially less expensive to build and operate, and would have substantially lower adverse environmental impacts when compared with the previously considered AA/DEIS build alternatives.

Tolling

It was disclosed in the FEIS that toll pricing would be used both as an incentive and disincentive to ensure a desirable flow of traffic (minimum LOS D) on the managed-lane system (FEIS, Section 2.3.1.4). On December 16, 2010, the GDOT P3 Steering Committee approved a draft Express Toll Lane (ETL) tolling policy for the project. Under this tolling policy, every vehicle using the managed lanes would pay a toll regardless of occupancy, including SOVs, HOVs, and certified alternative-fuel vehicles. The only exceptions would be registered transit vehicles (buses and vanpools operated by the government or regional transit agencies), military vehicles, emergency vehicles, and P3 Developer vehicles. Heavy and medium trucks, such as those with more than two axles, would not be permitted to use the managed lanes. Tolls would be collected through the use of electronic tolling systems and would be dynamically priced to maintain a minimum average operating speed of 45 mph. The tolling collection technology would be interoperable with other Georgia managed-lane systems and would include video tolling and remote cash payment options. The technology would be periodically reviewed to ensure that tolls are collected as efficiently and effectively as practicable, and could include the use of systems interoperable with other states, among other measures.

The Two-Lane Reversible Alternative, with the above mentioned modifications, was identified by GDOT as the Preferred Alternative in the FEIS (FEIS, Section 2.3).

4.0 Selected Alternative

As required by NEPA, a reasonable range of alternatives, including a No-Action (No-Build) Alternative, was evaluated in detail and presented in the environmental documentation for this project. The alternatives were developed in consideration of natural and social effects, engineering design considerations and input from the public and other local, state and federal

agencies. These alternatives are summarized in Section 3.0 above and in detail in their related NEPA documentation (AA/DEIS, Chapter 2.0; SDEIS, Chapter 2.0; FEIS, Chapter 2.0).

4.1 Basis for Selection of the Selected Alternative

The Two-Lane Reversible Alternative described in the FEIS/FEIS Reevaluation has been chosen as the Selected Alternative. The lanes will be managed using the ETL tolling policy. It is the environmentally preferred alternative and was chosen because it sufficiently addresses the need and purpose for the action while best balancing important environmental, community and economic values. It will also provide additional transportation options that will increase transportation system capacity in the Northwest Corridor and will improve access to activity centers. Persons using the managed lanes will experience reduced travel times compared to the No-Build Alternative. Travel time savings for the managed lanes compared to the No-Build Alternative for 2018 are projected to range from 5.4 – 43.5 minutes, depending on trip segment and peak travel direction (FEIS Reevaluation, Attachment 2, Figures 2-3; *Northwest Corridor Project Traffic Technical Memorandum, 2013 Addendum,* Parsons Brinckerhoff, 2013). Travel time savings for the managed lanes compared to the No-Build Alternative for 2035 are projected to range from 5.2 -73.5 minutes, depending on trip segment and peak travel direction (FEIS Reevaluation, Attachment 2, Figures 4-5; *Northwest Corridor Project Traffic Technical Memorandum, 2013 Addendum,* Parsons Brinckerhoff, 2013). Travel times for most travelers using the general purpose lanes will decrease slightly when compared to the No-Build Alternative. In terms of costs, the Selected Alternative will achieve the purpose and need in an efficient manner. The Selected Alternative was first identified between the AA/DEIS and SDEIS when a two-lane reversible facility was compared to a bidirectional facility (two lanes in each direction) and a three-lane reversible facility. It was found that in a two-lane reversible facility, the reversible lanes would be used nearly at full capacity during the commute periods. In contrast, for the additional cost of building two additional lanes for the non-peak direction, the non-peak direction traffic would not fully use the constructed capacity. And, for the additional cost to build a third reversible lane, projected high level of service during peak periods for directional flow traffic also indicated unused capacity. Considering these findings, GDOT concluded that limited financial resources should not be spent on constructing new highway lanes that would not be used to near capacity. The Selected Alternative also incorporates appropriate measures to avoid, minimize and mitigate potential impacts to the region's environment.

The environmental impacts of the Selected Alternative were carefully evaluated and weighed along with social and economic factors and other considerations, such as the ability of the Selected Alternative to meet the purpose and need of the project in a fiscally responsible manner.

4.2 Description of the Selected Alternative

The Selected Alternative will extend the existing managed-lane system on I-75 south of I-285 (Akers Mill Road) north through the Northwest Corridor. This extension of managed lanes on I-75 will provide system-to-system connections to the existing I-75 managed lanes (HOV lanes, one in each direction terminating at Akers Mill Road), the planned managed lanes on I-285, and

the proposed managed lane extending north along I-575 that is part of this project. The managed lanes will end north of Hickory Grove Road on I-75 and south of Sixes Road on I-575.

Under the Selected Alternative, two new managed lanes will be constructed on I-75 between Akers Mill Road and the I-75/I-575 interchange. A single managed lane will continue north on I-75 from the I-75/I-575 interchange to Hickory Grove Road. Similarly, a single managed lane will continue north on I-575 from the I-75/I-575 interchange to a point north of Ridgewalk Parkway and south of the Sixes Road interchange. The length of the managed-lane segment on I-75 is approximately 16.8 miles, and approximately 11.3 miles on I-575. Connecting the I-75 managed lanes to I-285 will require an additional approximately 1.6 miles of construction on I-285 for a total project length of 29.7 miles. The new managed lanes south of the I-75/I-575 interchange will be designed for highway speeds of 55 mph, while the new managed lanes north of the I-75/I-575 interchange will be designed for highway speeds of 65 mph. Figure 1-2 shows the location and number of managed lanes proposed on I-75 and I-575.

Unlike the existing HOV lanes on I-75 south of I-285, the new managed lanes on I-75 will be reversible lanes. The directional flow of the lanes will change during the day. During the morning peak commute period, the lanes will only accommodate southbound traffic. During the evening peak commute period, the directional flow of the traffic will be reversed to accommodate only northbound traffic. Like the two reversible lanes on I-75, the single reversible lanes north of the I-75/I-575 interchange will only accommodate peak period directional flows.

During peak periods, contra-flow traffic (i.e., morning northbound traffic, evening southbound traffic) will not be able to use the proposed reversible-lane system in the Northwest Corridor. The contra-flow traffic will have to use existing highway general-purpose lanes or alternate arterial roadways. Mechanical arms and/or barriers will prevent contra-flow traffic from accessing the managed-lane system. These barriers will be raised and lowered manually, and will be observable through the real-time video cameras.

Vehicles will use both managed-lane interchanges and slip ramps to access the reversible lanes (see Figure 1-2). A total of six new managed-lane interchanges will be constructed on I-75. These new managed-lane interchanges will be separately located from the existing general-purpose interchanges. In contrast, three pairs of slip ramps will be constructed to provide access to the reversible lane on I-575. These slip ramps will allow traffic in the inside general-purpose lanes to merge to the median area of the highway where the new reversible lane would be constructed. Separate slip ramps will be used for northbound and southbound traffic to prevent contra-flow traffic entering the reversible lane.

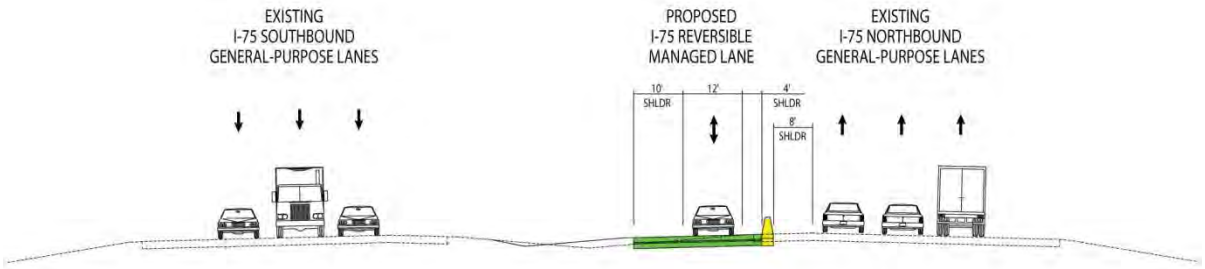
The new managed-lane interchanges at Terrell Mill Road, SR 3 Conn/Roswell Road, Big Shanty Road, and Hickory Grove Road will be constructed on the west side of the I-75 managed lanes. This will permit right-side exit and entrance in the morning peak period (southbound) and left-side entrance and exit in the evening peak period. A single ramp on either side of the cross roadway will be provided and intersect at a single signalized intersection. The exception is Hickory Grove Road, which will only have a south-facing ramp due to its close proximity to the north terminus on I-75. The ramps will operate in the direction of flow for the managed lane; southbound exit and entrance

in the morning peak period, and northbound exit and entrance in the evening peak period. The other side of the ramp will be physically gated at several locations and will not operate at the time the adjacent ramp does. In the morning peak period, the ramp lane on the north side of the cross street will operate as an exit ramp, and the ramp on the south side will operate as an entrance ramp. The adjacent lane(s) will be gated. In the evening peak period, the ramp south of the cross street will be an exit ramp for the managed lanes; and north of the cross street, will be an entrance ramp to the managed lanes. The adjacent lane(s) again will be gated.

Typical sections for the Selected Alternative are shown in Figure 4-1 and Figure 4-2 .

Figure 4-1 Selected Alternative - Typical Section-At Grade

I-75 Managed Lane (North of I-575) – Looking North



I-575 Managed Lane (North of I-75) – Looking North

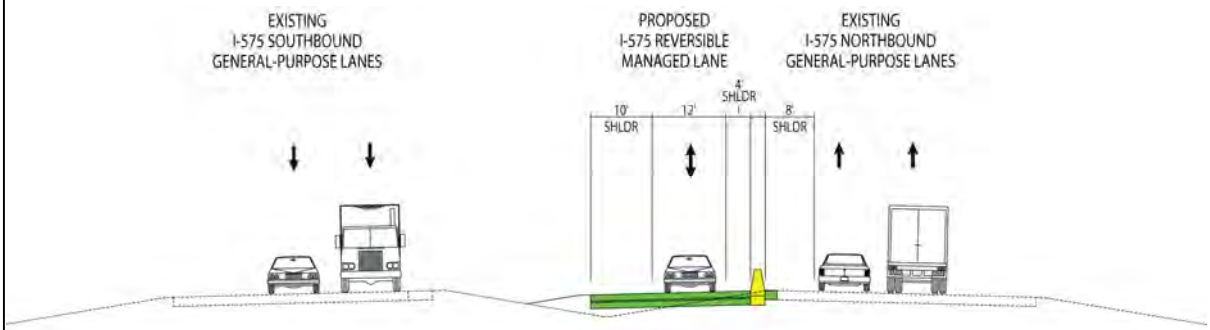
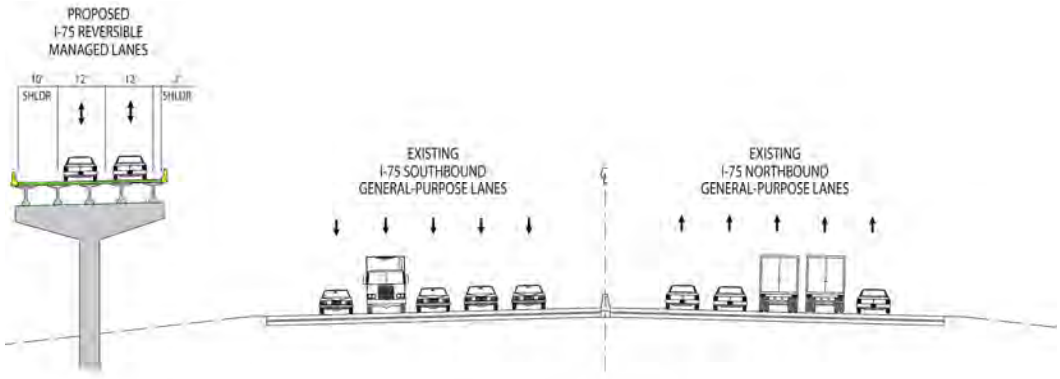


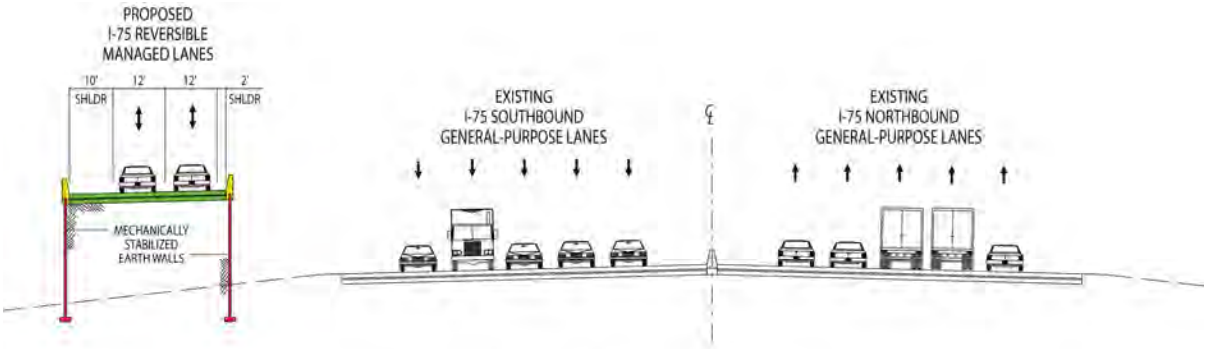
Figure 4-2 Selected Alternative - Typical Section-Elevated

I-75 Typical Elevated Managed Lanes
on Structures (South of I-575) – Looking North



I-75 TYPICAL SECTION
BETWEEN SOUTH MARIETTA PARKWAY AND NORTH MARIETTA PARKWAY
ON BRIDGE

I-75 Typical Elevated Managed Lanes
on Walls (South of I-575) – Looking North



I-75 TYPICAL SECTION
BETWEEN SOUTH MARIETTA PARKWAY AND NORTH MARIETTA PARKWAY
ON WALLS

4.3 Cost Estimate for the Selected Alternative

The project will be delivered utilizing a Design, Build Finance (DBF) approach. This approach allows the project to benefit from the investment and innovation of a Public Private Partnership (P3), while allowing the state to retain more control of this important regional transportation corridor. Under this approach, the private sector will contribute to the initial funding and will be responsible for design and construction of the project under the State's oversight. Responsibility for operations, maintenance, tolling and long-term financing will be retained by the State.

Georgia's share of the funds needed to deliver the project will come from several sources including motor fuel tax revenues and bonds. The Plan 2040 and the FY 2012-2017 TIP details the source of funds for this project.

Table 4-1 shows the funds that will be utilized to deliver the project.

Table 4-1 Source of Project Funds

Sources	$000s
TIFIA Loan[1]	$270,000
Developer Financing (Equity Capital/Loan/Debt)	$125,000
Public Funds Amount	$600,000
Total	$995,000

[1] Transportation Infrastructure Finance and Innovation Act

Source: *FY 2012-2017 Transportation Improvement Program,* Atlanta Regional Commission.

4.4 Summary of Impacts for the Selected Alternative

The decision to select the Two-Lane Reversible Alternative for implementation was made after careful consideration of the advantages and disadvantages of all the alternatives. Table 4-2 provides a summary of the impacts of the Selected Alternative. The FEIS (Chapter 3.0) and the FEIS Reevaluation (Attachment 2) document the detailed evaluation of the impacts of the Selected (Preferred) Alternative.

Table 4-2 Summary of Environmental Impacts

Impact	Selected Alternative
Acquisitions and Displacements	• 14 full and 65 partial acquisitions, totaling 79 acquisitions. • 6 residential and 7 commercial properties, including 12 businesses.
Land Use	• Supportive of ARC planning policies and local plans/policies. ARC evaluated four different regional land use and development scenarios in preparing PLAN 2040. The Local Policy scenario was derived from the locally generated Regional Unified Growth Policy Map and Livable Community Initiative areas. This scenario strikes a balance between land use decisions and transportation investments. The selected alternative is consistent with this approach by focusing on travel reliability and offering a choice instead of significant capacity improvement which is likely to trigger a sprawl growth pattern.
Population and Employment	• Residential and business acquisitions will result in the displacement of an estimated 15 people and 33 employees.

Impact	Selected Alternative
Economic Impacts	• Approximately $105,000 reduction in property taxes due to acquisitions.
Neighborhoods and Community Facilities	• Community effects will be limited to a small number of neighborhoods adjacent to the highway, primarily located on the west side of I-75 in the Marietta area. Effects include potential increases in noise levels. • Disruptions will be on the edges of existing neighborhoods, so no substantial change to cohesion. • No effects to community facilities or cohesion in any neighborhoods along the project corridor.
Environmental Justice	• Acquisition of 5 (of 6 total) residential and 7 commercial parcels located in minority and low-income neighborhoods. • Displacement of 15 people, 12 businesses, and 33 employees in low-income and minority neighborhoods. • Disproportionately high and adverse effect as a result of property acquisitions. • Adverse effect but not disproportionately high due to tolling.
Safety and Security	• Improved travel time in the managed lanes will facilitate improved emergency response times for emergency vehicles traveling on the I-75 corridor.
Visual Quality and Aesthetics	• Potential to generate less than substantial visual impacts to viewers of the road from adjacent land uses, but not out of context with the existing highway setting. • The use of aesthetic finishes, treatments, and landscaping can create a positive change in the corridor by creating a potentially unifying visual element along the highway for both views from the roadway and views of the roadway from adjacent properties and roadways.
Parklands and Other Section 4(f) Properties	• No impact to Chattahoochee River National Recreation Area, Olde Rope Mill Park, or a baseball field in the Deer Run Neighborhood. • No right-of-way or easements required from parklands. • Temporary construction impacts will occur on the Bob Callan Trail, but no anticipated permanent adverse impacts. Because the trail is a Section 4(f) resource and the project will have temporary impacts on the trail, the project must comply with the requirement for Section 4(f) approval based on Section 774.13(d). • Will not prevent the future construction of any of the programmed or proposed trails within the study area.
Historic and Archaeological Resources	• No historic resources affected. • No archaeological resources affected.
Air Quality	• Not expected to violate current applicable NAAQS. Will have no meaningful impact on regional air quality and mobile source air toxics (MSAT) as compared to the No-Build Alternative. • Project is in a non-attainment area for $PM_{2.5}$. Based on the results of the interagency consultation process, it was determined that the project is not a project of air quality concern and a quantitative hot-spot analysis is not required.
Noise	• Along I-75, road traffic noise will affect approximately 1,639 Activity Category B sites, 482 Activity Category C sites, and 411 Activity Category E sites. 34 sound barriers. • Along I-575, road traffic noise will affect 198 Activity Category B sites and 34 Activity Category C sites. 9 sound barriers.
Geology and Soils	• No impact.

Impact	Selected Alternative
Ecosystems	• No effect on 23 threatened and endangered species. • "May affect, not likely to adversely affect" Indiana bat, gray bat and Cherokee darter. • "No significant adverse affect" to Chattahoochee crayfish, bluestripe shiner, highscale shiner, delicate spike and lined chub.
Water Resources	• 3,309 linear feet of streams impacted. • 17 acres of 100-year floodplain impacted. • 0.0 acres of wetlands impacted. • CLOMR and LOMR required for crossing of Hope Creek and Rottenwood Creek
Hazardous Materials	• 11 medium-rated potentially contaminated parcels are located along I-75. • Of these 11 medium-rated parcels, 4 parcels are expected to be affected by potential right-of-way purchase and construction easements.
Construction Impacts	• Short-term impacts related to noise, visual quality, dust, vehicular access, and water quality. • 1.3 miles of longitudinal encroachments to 25-foot vegetative buffers as a result of the construction activities.
Indirect and Cumulative Impacts*	• No adverse indirect or cumulative impacts based on adopted land use plans, current ordinances, state and federal regulations and mitigation.*

*ICI Analysis is included in Appendix E of this document

4.5 Indirect and Cumulative Impacts for the Selected Alternative

The study area for the assessment of cumulative effects for the project consists of the existing highway, additional project right-of-way, adjoining neighborhoods, and connected ecosystems. The study area begins at Akers Mill Road, just south of the I-285/I-75 interchange and extends northward to the intersection of I-75 and I-575, where it splits. It continues on I-75 to the north terminus at Hickory Grove Road and follows I-575 to the second terminus at Sixes Road.

The above area was considered to be the project limit of influence for cumulative effects based on the following:

- The project is not expected to induce changes to existing or planned land use (see FEIS, Section 5.2).
- Additional right-of-way requirements are limited. Except for one segment, no more than 110 feet of right-of-way would generally be anticipated for the new reversible lane system, including the new managed-lane interchanges and slip ramps. However, up to about 150 feet of additional right-of-way would be required between South Marietta Parkway and SR 3 Conn/Roswell Road. Additional right-of-way would be required for the relocation of Frey's Gin Road at its intersection with SR 3 Conn/Roswell Road. No additional right-of-way would be required along I-75 between the I-75/I-575 interchange and Hickory Grove Road.
- The area described captures the full area of neighborhoods and natural resources that could be directly or indirectly affected by the project as well as by other past, present,

and reasonably foreseeable future actions and result in a cumulative impact on those neighborhoods or natural resources.

Indirect Effects

According to long-term population projections (see FEIS, Table 3-3) and employment forecasts (see FEIS, Table 3-10), the region is predicted to continue to maintain its long term growth pattern, despite the recession, regardless of whether or not the Selected Alternative is implemented.

The Selected Alternative was developed as a way to manage congestion created by the already established land use patterns in the region and provide trip reliability. The land use plans and future land use maps for the area paint a vision of continued growth with a focus on higher density development along the I-75 corridor and residential development beyond that and along I-575. Given the current and projected residential and employment trends and the future land use plans for the area, the Selected Alternative is not likely alter development trends in the area or induce development that is not already planned for development would be planned according to the local jurisdictions.

Cumulative Impacts

Based on the methodology outlined in the SDEIS (Section 5.18) and the FEIS (Section 5.18), potential cumulative effects of the project were evaluated for acquisitions and displacements; land use; economic resources; environmental justice; visual quality and aesthetics; air quality; noise; and water quality. More detailed information on cumulative impacts can be found in the SDEIS, Section 5.18; the FEIS, Section 5.18; and the FEIS Revaluation, Attachment 2, Sections A 2, B 1, C 1, and C 2.

The contribution of the proposed project to cumulative effects of the identified transportation, development and redevelopment projects that might occur in the future was anticipated to be negligible.

In the case of land use, cumulative impacts could vary substantially depending on land use and growth policies and strategies put in place by the Atlanta Regional Commission (ARC), Cobb County and the City of Marietta and other agencies and local governments responsible for land use planning and policies. If the current policies are followed, most new residential development would be focused in areas away from regional and community centers and most nonresidential development would be focused along major arterials, highway interchanges, and high-capacity mass transit routes and collectors. If the land use policies are not followed and enforced through zoning and other means, then residential and commercial development could spread outside areas targeted for growth. This is true regardless of whether or not the Selected Alternative implemented.

As with land use, cumulative impacts on economic resources could vary substantially depending on whether growth policies and strategies are followed. If growth occurs outside the areas targeted for growth, the local jurisdictions could experience increased costs to provide and maintain services.

The project would not result in meaningful shifts of traffic within the existing surface street system such that increases in traffic would be noticeable and/or require new traffic control measures. The project is projected to result in a 1 to 3 percent decrease in average daily traffic (ADT) on primary arterials that parallel I-75 and I-575 (Traffic Technical Report 2013 Addendum, Parsons Brinckerhoff, 2013).

These traffic shifts are the result of the complex and interrelated factors caused by the limited new capacity in the I-75 and I-575 corridors. The construction of the managed lanes adds some additional capacity to the project area as a whole, and to I-75 and I-575 in particular. This added capacity would be expected to cause a shift in traffic from parallel facilities such as US 41/Cobb Parkway. This is logical due to overall improvements in travel time on I-75 and I-575 in both the managed and general purpose lanes. The shift, however, would not be expected to be one-to-one. Rather, less traffic would shift from the parallel primary arterials than is forecast in the managed lanes. This would cause a reduction in travel times for the general purpose lanes under the Selected Alternative in comparison to the No-Build Alternative.

In the traffic analysis, some minor changes in traffic patterns were noted with the construction of the four new managed lane/local access interchanges on I-75. The new interchanges would add traffic to the cross streets at Terrell Mill Road, SR 3 Conn/Roswell Road, Big Shanty Road, and Hickory Grove Road. However the peak hour volumes are relatively small due to the single- or two-lane capacity of the managed lanes and the distribution of this traffic across 4 new interchanges. These volume increases were not enough to require any overall improvements to the roadways beyond the immediate interchange ramps. Some minor volume changes were noted at the existing and planned managed lane interchange locations on I-75 due to redistribution to the new managed lane interchanges. None of these changes necessitated any changes in the existing roadway configurations.

A modal shift of trips to transit vehicles was also noted in the analysis. This shift reduced the overall traffic volume in the corridor under the Selected Alternative, while the number of trips remained constant. In addition, more trips were made in higher capacity transit vehicles.

No development or redevelopment or substantial shifts in traffic on the existing surface street system are expected to be induced in the study area by the project.

The nature of managed lane facilities requires that the per lane volumes in the facilities are lower in comparison to the overall per lane volume in the corridor to optimize travel time savings. As noted in the Purpose of the Project (FEIS page 1-8), reducing travel time and congestion, improving reliability, and enhancing connectivity are among the purposes of the project. In the FEIS (Table 4-6, page 4-10) the managed lanes are forecast to carry nine to twelve percent of the I-75 traffic volumes and seven to nine percent of the I-575 traffic volumes in 2035. The percentages are less under the reevaluation, but as noted these are impacted by the toll rates brought forward from the FEIS. The overall proportion of traffic in the managed lanes will be similar although slightly higher under GDOT's operational strategies under the reevaluation modeling.

The corridor operations improve under the Selected Alternative, with better levels of service and travel times under the Selected Alternative for both the managed lanes and general purpose lanes. These improvements focus on reliability for managed lane users and transit riders in the managed lanes. There are improvements for the general purpose lanes as well, but they are unlikely to generate indirect impacts for land use.

The travel forecasting for the project in both the FEIS and the Reevaluation was conducted as conservatively as possible, and assumed that there were no connections to adjacent managed lanes projects on I-285 and I-75 south of I-285. Section 7 (Page 7-1 through 7-5) of the Reevaluation and Section 2.4 (Page 2-45 through 2-47) examine traffic operations where the managed lanes merge into and diverge from the general purpose lanes. Overall levels of service and travel times through the merge and diverge segments under the Selected Alternative and No-Build are fairly consistent, with some minor degradation of service near 2035. GDOT has committed to monitor these situations and take appropriate steps to relieve any congestion.

The ARC is required by the US Department of Transportation (USDOT) to develop a long range regional transportation plan (RTP) that covers a minimum 20-year time span. The plan must be updated every four years in air quality nonattainment areas. The RTP provides a framework to address anticipated growth. It provides a comprehensive statement of the future regional transportation needs and defines both short and long term transportation strategies and investments to improve the region's transportation system. The RTP contains the transportation improvement program (TIP), which is a financially constrained six-year program of improvements. Federal planning requirements require that the first four years of the TIP be balanced by year. Subsequent years of the TIP and the long-range element of the RTP are balanced by funding periods.

The entire managed lane system has not been designed to the point of being able to definitively identify the impacts of each component project. Not all component projects that comprise the proposed managed lane system, are included in the current ARC *Regional Transportation Plan (PLAN 2040)* since the plan is financially constrained and based on current and reasonably foreseeable needs. Based on the anticipated funding scenario and funding availability, those projects in the RTP should be within the financial capacity of the region to implement. As mentioned above, the RTP and the TIP are evaluated on a regular basis and revised as necessary. Components of the managed lane system not included in the RTP should, by the nature of their omission, not be considered reasonably foreseeable future actions and therefore not considered as part of the cumulative impact analysis.

The State is implementing managed lanes in the region in a careful and studied manner. Not all of the projects identified in the Managed Lane System Plan are included in the TIP or RTP. The projects in the TIP and RTP have independent utility and do not depend on the implementation of other managed lane projects in order to provide meaningful benefits to the traveling public. The projects in the Managed Lane System Plan were grouped into tiers, with the Tier 1 projects being the projects with the highest priority. The Northwest Corridor Project was identified as a Tier 1 project.

With regard to environmental justice, because of the relatively small number of residential displacements and the minimal effect on the neighborhoods, the project contribution to the cumulative effect of displacements, when combined with other development-related displacements of minority and low-income persons is expected to be negligible.

An evaluation of the social equity effects of the *Atlanta Regional Managed Lane System Plan* (HNTB, 2010) concluded that environmental justice communities are not disproportionately impacted by managed lanes and that the congestion reduction resulted in the potential for air quality benefits. An earlier study, *HOT Lane Environmental Justice Analysis* (SRTA, 2006) that looked at the effects of tolling on environmental justice populations found that while regional implementation of HOT lanes did not appear to disproportionately impact any particular group when it did not include converting existing HOV or SOV lanes to HOT operation, implementation of HOT lanes would create localized environmental justice concerns. The analysis for the Selected Alternative (HNTB, 2013) does indicate that the project could have an adverse effect on low-income populations due to tolling. As a result, while the cumulative effect of the Atlanta Regional Managed Lane System on environmental justice populations in the study area is not anticipated to be disproportionate, some areas of concern do exist.

As stated in the *Technical Memorandum Update-Evaluation of Tolling Effects on Low Income Populations* (HNTB, 2013), the evaluation of tolling effects on low income populations indicates that the implementation of new, tolled capacity is anticipated to generate adverse impacts on all populations, including the EJ population. Decreased usage, while possible, is attributable to individual choices. The benefits of the project accrue to all users of the managed lanes, regardless of income, and to all users of the general purpose lanes, regardless of income, and will therefore not amount to a denial, reduction, or significant delay in the receipt of benefits to low income populations.

Mitigation for the potential adverse effect is discussed below in Section 6.3.

In the context of visual effects, cumulative impacts would occur with implementation of multiple projects in the same viewshed. Because of the existing urban and developing environment along the I-75 and I-575 corridors and scattered nature of the potential transportation and development/redevelopment projects, which would affect a range of discrete views and visual settings, cumulative visual impacts were not anticipated.

The cumulative effect of the past, present and reasonably foreseeable actions within the study area are not expected to adversely affect air quality in the region. The proposed project is included in the ARC's recently adopted *PLAN 2040* RTP (ARC 2011b). A conformity determination conducted for this RTP was updated for the FY 2012-2017 TIP (ARC, 2011c) and the Volume II: *PLAN 2040 Conformity Determination Report* (ARC, 2011d).

For noise, the future year analysis includes projected traffic volumes and speeds for the project, forecasted background traffic growth, traffic growth resulting from other planned and programmed projects for the area and improvements in speed resulting from capacity improvements. As a result, the noise impacts predicted in the noise analysis and presented in

the SDEIS, FEIS, and FEIS Reevaluation represent direct, indirect and cumulative noise impacts in areas where the project could influence traffic.

With regard to floodplains, wetlands, streams and water quality, there is potential for effects from reasonably foreseeable future transportation and development projects. However, the projects would be required to comply with the ordinances and regulations for these resources. These include:

- Ordinances and regulations that restrict development in floodplains and affects on flood elevations.
- Requirements of the Georgia Erosion and Sedimentation Act of 1975, as amended and implemented by the GDNR, Environmental Protection Division that include stream protection measures. These measures include provision of a 25-foot vegetative buffer for warm-water non-trout streams and a 50-foot vegetative buffer for cold water trout streams. Encroachments to these buffers generally require a stream buffer variance that includes requirements for erosion control measures.
- Other requirements for land-disturbing activities that may result in soil erosion and sedimentation include best management practices such as minimizing cut and fill, timely vegetation and re-vegetation, trapping runoff by use of debris basins, sediment basins, silt traps or similar measures.
- Required submittal of erosion and sedimentation control plans for permit approvals.

As a result of the ordinances and regulations, cumulative impacts to floodplains, wetlands, streams and water quality are not anticipated.

5.0 Section 4(f) Statement

Section 4(f) of the US Department of Transportation (USDOT) Act of 1966, as amended (49 *United States Code* [USC] 303), states that USDOT may not approve the use of land from a significant publicly owned park, recreation area, or wildlife and waterfowl refuge, or any significant historic site unless a determination is made that the project will have a *de minimis* impact or unless a determination is made that:

1. There is no feasible and prudent avoidance alternative, as defined in 23 CFR 774.17, to the use of land from the property; and
2. The action includes all possible planning, as defined in 23 CFR 774.17, to minimize harm to the property resulting from such use.

If analysis concludes that there is no feasible and prudent avoidance alternative, then USDOT may approve only the alternative that causes the least overall harm in light of the statute's preservation purpose.

The alignment of the Selected Alternative will affect one Section 4(f) resource, the Bob Callan Trail, a recreational trail in Cobb County. The section of the trail that will be crossed via bridges by the managed lanes is within existing GDOT right-of-way. The use of this Section 4(f)

resource will be temporary during construction and will not result in any permanent adverse impact to the trail.

This section of the trail will be subject to temporary closures during construction of the structures for safety reasons. The closures will occur at night when the trail is normally closed. Pedestrian traffic will be maintained during the normal operating hours of the trail. The project will comply with the requirement for Section 4(f) approval based on 23 CFR Section 774.13(d). In a letter dated August 26, 2010, the Cobb County Department of Transportation, the agency with jurisdiction over the trail, provided a formal response in which they concurred with the following statements:

- Any periodic trail traffic pacing (disruption) will be temporary in nature;
- No changes to the trail will occur and any traffic pacing will be to assure the safety of trail users;
- No permanent adverse physical impact to the trail will occur; and
- Any physical impact to the trail will be addressed so that the trail will be returned to a condition that is at least as good as that which existed prior to project construction.

In summary, temporary occupancy of the Bob Callan Trail for short periods during construction of the managed lanes overhead will occur. The temporary occupancy meets the conditions under Section 23 CFR 774.13(d) therefore, the temporary occupancy does not constitute a use of Section 4(f) property. As mentioned above, Cobb County Department of Transportation, the agency with jurisdiction over the trail, provided a formal response in which they concurred with the conditions. A copy of the letter is included in Appendix G. Since there is no use of a Section 4(f) property, a Section 4(f) analysis was not required for the project.

More detailed information can be found in the SDEIS, Section 5.9 and the FEIS, Section 5.9.

6.0 Measures to Minimize Harm

Measures to minimize harm associated with the Selected Alternative include both those that are incorporated in most transportation improvement projects, such as relocation services, as well as project-specific commitments.

6.1 Project-Specific Commitments

Project-specific commitments are presented in Appendix A and also appeared in the FEIS and the 2013 FEIS Reevaluation. In addition to the environmental commitment sheets (Green Sheets), Appendix A contains a copy of the project Environmental Mitigation Plan.

6.2 Relocations

The project will result in six residential displacements and 12 business displacements (FEIS, Section 5.3) According to the *Conceptual Stage Relocation Study* (Hunt, 2010, the residential relocations will not cause a housing shortage. There is currently available adequate decent,

safe and sanitary housing. Suitable sites for relocating the displaced businesses are also currently available.

The GDOT will provide relocation assistance to residences and businesses displaced during acquisition of right-of-way in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (49 CFR Part 24) and the Georgia Relocation Assistance and Land Acquisition Policy Act (Title 22 Official Code of Georgia Annotated [OCGA] Chapter 4).

More detailed information on relocations can be found in the SDEIS, Section 5.3; the FEIS, Section 5.3; and the FEIS Reevaluation, Attachment 2, Section A 1.

6.3 Environmental Justice

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority and Low-Income Populations" (February 11, 1994), directs Federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of Federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law. As per FHWA Order 6640.23, there are two criteria to apply to determine whether an effect would be disproportionately high and adverse:

- Low-income or minority populations would predominately bear the effect; or
- Low-income or minority populations would suffer the effect, and the effect would be considerably more severe or greater in magnitude than the adverse effect suffered by the general population.

As part of the public project planning process through the completion of the FEIS, GDOT implemented outreach efforts to minority and low-income communities to assure their active participation. Outreach included the translation of project newsletters into Spanish and Portuguese, the provision of interpreters at public meetings, staffed project kiosk events in identified low-income areas. The outreach efforts are described detail in the AA/DEIS (Chapter 6.0), SDEIS (Chapter 6.0), FEIS (Chapter 6.0), and the FEIS Reevaluation (Attachment 2, Section A-3).

As discussed in Section 6.2 above, the Selected Alternative will result in six residential displacements and 12 business displacements (FEIS, Section 5.3). Five of the six residential displacements and all of the business displacements will occur in minority and low-income communities (FEIS, Section 5.6.2; FEIS Reevaluation, Attachment 2, Section A 2). This would result in a disproportionately high effect to low-income and minority persons with regard to residential and business relocations.

The GDOT will provide relocation assistance to residences and businesses displaced during acquisition of right-of-way in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (49 CFR Part 24) and the Georgia Relocation Assistance and Land Acquisition Policy Act (Title 22 Official Code of Georgia Annotated [OCGA] Chapter 4).

Based on the results of the evaluation of tolling effects on low-income populations for the NWCP (HNTB, 2013), the Selected Alternative would result in an adverse, but not disproportionately high effect on low-income populations. This is discussed in more detail in the FEIS, Section 5.6.3 and the FEIS Reevaluation, Attachment 2 Section A 2.

To mitigate potential adverse impacts of tolling, GDOT will, following completion of project construction, conduct annual surveys of users over a three-year period will be conducted; dissemination of monitoring information will be provided on the SRTA and GDOT websites. While the data gathered from these surveys may not enable near-term mitigation with this particular toll project, it will be available to assist in making decisions about any future toll-related projects that might be studied in the future

In addition, GDOT and the State Road and Tollway Authority (SRTA) will implement a cash option toll payment method. The SRTA intends to provide choices and flexibility to current as well as potential Peach Pass customers. The SRTA is developing several strategies to allow cash-based or cash-preferred customers multiple payment methods so that they can utilize the state's toll facilities. These payment "channels" include in-person Customer Service centers and retail based payment options.

The SRTA currently operates three walk up Customer Service Centers where current as well as new customers can transact business in person with SRTA. These locations support new account sign up, account closings, account payments and violation payments. Each location is set up to process payments made via cash, check or credit card. Customers will have the choice to open pre-paid Peach Pass accounts via credit card or cash. Either payment method is subject to the same charges and fee schedules. In addition, to the payment related transactions identified above, Peach Pass customers can request and receive Peach Pass transponders, as well as update vehicle and account information at these locations. SRTA's primary Customer Service Center is located at SRTA's headquarters in downtown Atlanta. The current Customer Service Centers are located at:

- State Road and Tollway Authority, 47 Trinity Ave. SW, Ground Floor, Atlanta, GA 30334
- Department of Driver Services, 2211 Beaver Ruin Road, Norcross, GA 30071
- Department of Driver Services, 310 Hurricane Shoals Road, NE, Lawrenceville, GA 30046

Prior to the opening of the I-85 Express Lanes in 2011, SRTA opened two Customer Service Centers co-located at Georgia Department of Driver Services (DDS) Service Centers along the I-85 corridor in order to facilitate account set up and transponder penetration, and general motorist education of the I-85 Express Lanes. SRTA intends to duplicate this model by partnering with DDS to co-locate Peach Pass Customer Service Centers at other DDS locations located in the vicinity of future planned toll facilities including the planned I-75 NWC managed lanes. In addition, SRTA's marketing plans include opening additional locations near the

physical location of upcoming toll facilities. This allows SRTA to have a presence that is physically convenient to motorists most likely to use the new facility.

The SRTA is committed to providing transponders at no cost. Transponders and pre-paid cards can be obtained with cash at SRTA facilities and convenient locations such as grocery stores along the corridor. The pre-paid card can be purchased for a minor fee at convenient locations. The transponders are free at both the SRTA facilities and at convenient locations. For both cash-backed and credit card-backed Peach Pass accounts, the account holder must initially deposit $20 when the account is established, which can then be used to pay tolls. For the credit card-backed account, the account holder's card is charged $20 when the account balance falls below $10, bringing the total account balance back up above $20. For the cash-backed account, the account holder must monitor the account value to ensure that the balance is sufficient to pay tolls. If at any point the account balance falls below the level necessary to pay any tolls due, that account holder is in violation, and those tolls due will be collected according to the procedures outlined in SRTA's business rules. "In situations in which the purchase of a transponder presents a significant economic barrier, low-income travelers who cannot afford a transponder will face a regressive toll schedule. It is estimated that between 10 and 20 percent of the population is unable to overcome these barriers to transponder ownership (Parkany, 2005)" (*Income-Based Equity Impacts of Congestion Pricing,* pages 6-7).

Public outreach to minority and low-income populations will be ongoing through project design, construction, and operation. Outreach may include, but is not limited to press releases, public meetings, neighborhood/community meetings, project newsletters, project website updates and emails. The P3 Developer, working collaboratively with GDOT, will furnish facility-related materials in multilingual communications, not limited to English, Spanish, Portuguese, and other languages.

In addition, the following potential mitigation strategies were identified but dismissed.

Utilization of a HOT Tolling Policy

The ETL policy was chosen as the toll policy for the Northwest Corridor Project for the reasons outlined in the *Tolling Policy for the I-75 and I-575 Northwest Corridor Project Technical Memorandum*, which is Appendix A to the *Technical Memorandum Update - Evaluation of Tolling Effects on Low Income Populations*. By allowing certain vehicles to travel without paying a toll, it would be harder to manage the operations of the system to provide a reliable trip time. It would also be harder for the project to pay for debts incurred for the construction of the project.

Subsidized Transit Use in the Corridor

The Selected Alternative provides a fixed guideway for transit vehicles and registered vanpools that can use the managed lanes at no additional charge. SRTA's business rules maintain that these vehicles will not be tolled when they pass under the toll collection equipment, so there is no required administrative activity associated with seeking reimbursement of tolls incurred, which is an additional benefit to transit. Information GRTA indicates that in 2012, based on current route structure, the ridership on the GRTA Xpress routes in the corridor that describes

their racial or ethnic background as African American/Black, Asian, American Indian or Other ranges from approximately 23 percent on Route 491 to approximately 38 percent on Route 480. Information from Cobb Community Transit (CCT) indicates that in 2011 on the CCT and GRTA Xpress routes that utilize I-75 (Routes 10C, 100, 101,102, 480 and 481), and would be expected to shift at least part of their route onto the proposed managed lanes, the ridership ranges from 28 percent to 34 percent minority. The areas that are served by those routes are less than 30% minority population. Income information was only available from GRTA and indicated that with the current route structure; approximately 12 percent of the corridor ridership earns less than $50,000 annually. The percentage of riders with household incomes of $24,000 or less (US Department of Health and Human Services (HHS) 2012 poverty guideline for a 4-person household is $23,050) ranged from 0 percent on Route 481 to 8 percent on Route 480. Based on the available information, it appears that transit routes that currently utilize the I-75 corridor are utilized by environmental justice populations in meaningful percentages.

Transit vehicles and registered vanpools may experience the travel time savings and trip reliability that the managed lanes provide. This may make transit operations more reliable in the corridor. Transit routes can be adjusted to follow demand for service and over time balance cost and ridership to the extent practical.

It is likely that over time, transit routes will evolve to capitalize on the managed lanes and the improved travel times. Since transit trips often take longer than car trips, the improved travel time may allow some dispersal of transit-dependent EJ populations since their journey to work could be made shorter by use of transit in the managed lanes.

Dedication of Excess Toll Revenue to the Corridor

It is anticipated that all of the toll revenue will be needed to pay for the operation and maintenance of the facility and to pay off the debt associated with the construction of the project. If there are toll revenues in excess of the projections, they would not be expected to occur in the early years of the project, as the debt is structured over a thirty-five year period. If there are toll revenues in excess of the projections, the State may share in these excess revenues. The State's share of these excess revenues, if they occur, would be used to help fund other transportation projects in the statewide plan. Any excess funds will be returned and reprogrammed through the planning process for Title 23-eligible activities. The selection of those projects will be vetted publicly. Current State toll policy does not allow toll revenue to be used for transit and such a shift in policy would have to be approved by the SRTA Board and possibly the Georgia General Assembly. There is no state law that requires toll revenues to be spent on the particular corridor that generates the tolls.

Subsidized Minimum Level of Managed Lane Access

Providing trips at no cost in the managed lanes does not address the alleged position that certain motorists will not use the managed lanes because their financial circumstances would not otherwise allow them to use the lanes. Particularly when coupled with the suggestion that the managed lanes should be operated under a HOT3+ tolling policy, a substantial portion of the available capacity in the facility could be used at no charge. Since the free usage would be

difficult to predict, it could impact overall use of the facility and the ability of the project to meet its financial goals.

One of the goals of the project is to "provide cost-effective and affordable transportation improvements." The project is included in the fiscally-constrained Transportation Improvement Program (TIP) for the region as an ETL project. Under a HOT3+ policy some users would not pay to use the managed lanes, so less revenue would be generated compared to an ETL policy. If the project cannot meet its financial requirements from project revenues, the state (GDOT) must provide the difference. This could impact the potential to implement other transportation projects. A HOT3+ tolling policy would also shift some of the burden of the cost of the project from the users of the managed lanes to taxpayers statewide since vehicles with three or more occupants would use the managed lanes but not pay for the use.

Allowing vehicles to use the managed lanes at no cost could result in operational issues as the number of vehicles in the managed lanes at a given time could not be managed. If this were to occur, the project would not meet one of its key purposes: "... improve mobility by reducing travel time and increasing reliability."

Per Mile Toll Cap

If a per mile toll rate cap were to be introduced it would limit the ability of GDOT and SRTA to manage the operational performance of the lanes. Dynamic pricing provides a mechanism to regulate facility demand, which allows flexibility to maintain minimum travel speeds regardless of the total demand in the corridor. If the toll rate were capped, then under congested conditions too many cars would use the managed lanes and reduce speeds, and therefore increase travel times. If this were to occur, the project would not meet one of its key purposes: "... improve mobility by reducing travel time and increasing reliability." A similar priced managed lane project, I-95 Express in Florida, has experienced challenges of operating with the constraint of toll rate boundaries or a cap. This constraint has proven to be such a serious limitation that there is consideration for removing the toll rate cap by the Florida Turnpike Authority that operates the system. More detailed information on environmental justice can be found in the SDEIS, Section 5.6; the FEIS, Section 5.6; and the FEIS Reevaluation, Attachment 2, Section A 2.

6.4 Cultural Resources

Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f) affords consideration of properties that are listed, or eligible for listing, on the National Register of Historic Places (NRHP). As discussed in Section 5.0, Section 4(f) of the USDOT Act of 1966, as amended (49 USC 303), protects publicly owned public parks, publicly owned recreation areas, wildlife and waterfowl refuges, and historic sites of national, state, or local significance from conversion to highway use using FHWA administered funds unless there is no alternative and unless all planning is done to minimize harm.

In accordance with the requirements of Section 4(f), Section 106, and NEPA, surveys were conducted to identify cultural resources within the project area. Two historic resources eligible for listing in the NRHP were identified in the project area. These resources are the Marietta and

North Georgia Railroad and the Dobson Gulf Service Station-Marietta Muffler. On September 16, 2011, the State Historic Preservation Officer (SHPO) concurred that the Selected Alternative will not affect these historic properties. A copy of this concurrence can be found in Appendix G.

More detailed information on cultural resources can be found in the SDEIS, Section 5.10 and the FEIS, Section 5.10.

6.5 Noise Impacts

The Selected Alternative is expected to result in an impact to 2,532 receptors along the I-75 corridor and 232 receptors along the I-575 corridor. Of the 2,532 impacted receptors along the I-75 corridor, 1,639 were residential, 411 were commercial and 482 were other uses. Of the 232 impacted receptors along the I-575 corridor, 198 were residential, 0 were commercial and 34 were other uses.

Noise abatement was considered for all impacted receptors. The barrier analysis found that barriers in 34 locations along I-75 met the GDOT feasibility and reasonableness requirements, providing noise abatement to 1,773 receptors. The barrier analysis found that nine locations along I-575 met the GDOT feasibility and reasonableness requirements, providing noise abatement to 382 receptors.

More detailed information on noise impacts can be found in the SDEIS, Section 5.12; the FEIS, Section 5.12.2; and the FEIS Reevaluation, Attachment 2, Section C 1.

The final decision on whether a sound barrier that has been determined feasible and reasonable is constructed will be made upon completion of additional detailed noise abatement analysis based on the final project design by the selected P3 Developer and public outreach to those property owners potentially affected.

The GDOT noise abatement policy requires the affected property owners and dwellers complete and submit a ballot voting form for proposed sound barriers in their neighborhood. Sound barriers will only be constructed if a minimum of 50 percent plus one of the respondents vote in favor of the sound barrier.

A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed, the feasibility and/or reasonableness determinations and decision to provide abatement will be reconsidered. The final decision on the installation of any abatement measures will be made upon completion of the project's final design and the public involvement process.

6.6 Air Quality

The NWCP is listed in *PLAN 2040* FY 2012-2017 TIP as ARC Project AR-ML-930 and P.I. 0008256 and in the previous *Envision6* FY 2008-2013 TIP as Project AR-930. The *PLAN 2040 Regional Transportation Plan* (RTP) and the FY 2012-2017 TIP were adopted by the ARC Board on July 27, 2011 and approved by GRTA on August 18, 2011. The FHWA issued a

conformity determination on September 6, 2011, which means the project is part of a conforming RTP and TIP. The plan and TIP were updated on June 8, 2012.

The Metropolitan Atlanta Area is classified as a non-attainment area for $PM_{2.5}$. Based on the results of the interagency consultation process, it was determined that the project is not a project of air quality concern and a quantitative hot-spot analysis is not required to meet the standards of the Clean Air Act and 40 CFR 93.123(b)(1). The US Environmental Protection Agency (USEPA) concurred that the proposed project is not a project of air quality concern on February 4, 2013.

More detailed information on air quality can be found in the SDEIS, Section 5.11; the FEIS, Section 5.11; and the FEIS Reevaluation, Attachment 2, Section C 2.

6.7 Protected Species

Potentially suitable habitat for three federally listed species (Cherokee darter, Indiana bat and gray bat) and four state-listed species (Chattahoochee crayfish, bluestripe shiner, highscale shiner and delicate spike) is present in the Selected Alternative corridor. Potentially suitable habitat was present for the state-listed lined chub in the Little River just outside of the project limits.

The effects determination for federally and state-listed species is listed below. The US Fish and Wildlife Service (USFWS) concurred with the effects determination for federally listed species on March 7, 2013 as follows:

May affect, but not likely to adversely affect:

- Indiana bat (*Myotis sodalis*)
- Gray bat (*Myotis grisescens*)
- Cherokee darter (*Etheostoma scotti*)

No significant adverse effect:

- Chattahoochee crayfish (*Cambarus howardi*)
- Bluestripe shiner (*Cyprinella callitaenia*)
- Highscale shiner (*Notropis hypsilepis*)
- Delicate spike (*Elliptio arctata*)
- Lined chub (*Hybopsis lineapunctata*)

Special Provision (SP) 107.23G, which contains measures that will be implemented for the protection of the federally endangered Indiana bat and gray bat, the federally threatened Cherokee darter, and the state-listed Chattahoochee crayfish, highscale shiner, bluestripe shiner, delicate spike, and lined chub during construction of the Selected Alternative is included in the project Environmental Commitments Table (Green Sheets) and the Environmental Mitigation Plan (see Appendix A).

Given the presence of potentially suitable Indiana bat summer roosting and foraging habitat and the potential presence of gray bat foraging habitat within the Selected Alternative corridor,

avoidance and minimization measures, in the form of BMPs (identified in SP 107.23G), will be implemented during the construction of the Selected Alternative. The BMPs include:

- scheduling tree removal in construction zones from October 15-March 31 to prevent disturbance to trees that may harbor Indiana bat summer colonies or gray bat foraging habitat;
- minimizing tree clearing within construction limits, and limit it to that absolutely necessary to complete the project;
- re-vegetating disturbed areas with tree species that produce sloughing bark and snags; and
- disallowing any equipment to operate directly in streams.

In the event any incident occurs that causes harm to the Indiana bat, gray bat, Cherokee darter, Chattahoochee crayfish, highscale shiner, bluestripe shiner, delicate spike, or the lined chub or that could be detrimental to the continued existence of these species along the project corridor, the P3 Developer shall report the incident immediately to the Project Engineer who in turn will notify:

- USFWS, Athens Field Office at (706) 613-9493 and/or the Nongame/Endangered Wildlife Program, Georgia Department of Natural Resources (GDNR) office at (478) 994-1438;
- FHWA, Georgia Division at (404) 562-3630; and
- Glenn Bowman, GDOT, Office of Environmental Services at (404) 631-1101.

In the event of possible harm to the Indiana bat, gray bat, Cherokee darter, Chattahoochee crayfish, highscale shiner, bluestripe shiner, delicate spike, or the lined chub the above agencies and the Project Engineer shall be notified immediately and all activity shall cease pending consultation by the Department with USFWS and/or GDNR/WRD and the lead Federal Agency.

More detailed information on protected species impacts can be found in the SDEIS, Section 5.13.2; the FEIS, Section 5.13.2; and the FEIS Reevaluation, Attachment 2, Section B 2. Section 7 concurrence correspondence is in Appendix G.

6.8 Wildlife Habitat

Special Provision (SP) 107.23 G, which contains measures that will be implemented for the protecting of migratory bird nesting and/or potential nesting habitat during construction of the Selected Alternative, is included in the project Environmental Commitments Table (Green Sheets) and the Environmental Mitigation Plan (see Appendix A).

In the event any incident occurs that causes harm to Eastern phoebes, cliff swallows, or barn swallows or that could be detrimental to the continued existence of these species along the project corridor, the P3 Developer shall report the incident immediately to the Project Engineer who in turn will notify:

- USFWS, Athens Field Office at (706) 613-9493 and/or the Nongame/Endangered Wildlife Program, Georgia Department of Natural Resources Office at (478) 994-1438;
- FHWA, Georgia Division at (404) 562-3630; and
- Glenn Bowman, GDOT, Office of Environmental Services at (404) 631-1101.

In the event of possible harm to Eastern phoebes cliff swallows, or barn swallows, the above agencies and the Project Engineer shall be notified immediately and all activity shall cease pending consultation by the Department with USFWS and/or GDNR/WRD and the lead Federal Agency.

More detailed information on migratory birds can be found in the SDEIS, Section 5.13.4 and the FEIS, Section 5.13.4.

6.9 Jurisdictional Waters

All Waters of the US, state waters and stream/pond buffers will be shown on the plans and appropriately labeled.

The Selected Alternative will affect approximately 3,309 linear feet of streams. The required compensatory mitigation for stream impacts in the Chattahoochee River Basin, totaling 3,225 linear feet, would be 9,573.75 stream credits. The required compensatory mitigation for stream impacts in the Etowah River Basin, totaling 84 linear feet of stream impacts, would be 371.1 stream mitigation credits. The total required compensatory mitigation for the Selected Alternative is 9,944.85 stream mitigation credits. These impacts would be mitigated following the April 2004 final version of the USACE *Standard Operating Procedure* (SOPs). The 9,944.85 required stream mitigation credits for unavoidable permanent stream impacts will be provided by using an USACE -approved commercial mitigation bank or GDOT-owned bank serving hydrologic unit code (HUC) 03130001 and HUC 03150104.

Stream crossings resulting in impacts to the state-mandated buffer at three of the streams (Streams 4, 8 and 16) within the Selected Alternative will require a state buffer variance per the Georgia Erosion and Sedimentation Control Rules 391-3-7, promulgated under the Georgia Erosion and Sedimentation Act (Act), O.C.G.A. 12-7. However, a state buffer variance is not required at the remaining stream crossings where the buffer impact would be exempt per the 50-foot exemption area for culvert structures and/or the 100-foot exemption area for bridges.

Environmental harm will be minimized by using standard sedimentation, erosion, and hydrologic control measures, including the following:

- Preservation of roadside vegetation beyond the limits of construction, where possible. All of the stream buffers (both perpendicular and longitudinal) will be protected from the clear zone expansion efforts of this project.
- Early re-vegetation of disturbed areas so as to minimize soil erosion. In addition, those stream buffers that are already encroached by current maintenance (mowing and bush hogging) will be restored by reduction of clearing in those locations.

- The project will include the use of slope drains, detention/retention structures, surface, subsurface and cross drains, designed as appropriate or needed, so that discharge will occur in locations and in such a manner that surface and subsurface water quality will not be affected (the outlets may require aprons, bank protection, silt basins, and energy dissipaters).
- The project will include construction features for the control of predicted erosion and water pollution in the plans, specifications and contract pay items (Georgia Standard Specifications – Section 161 through 171 and 700 through 715 identify the pollution control measures that may be used).
- The dumping of chemicals, fuels, lubricants, bitumens, raw sewages, or their harmful waste into or alongside of streams or impoundments, or into natural or man-made channels leading thereto, will be prohibited.
- Compliance with terms of the National Pollutant Discharge Elimination System (NPDES) permits for construction activities will be required, to include preparation and submittal of a project Notice of Intent (NOI) and a Notice of Termination (NOT). The NPDES permit also requires preparation and implementation of erosion, sedimentation, and pollution control plan and a comprehensive monitoring program. Best management practices outlined in the erosion, sedimentation, and pollution control plan must be consistent with, and no less stringent than, practices set forth in the *Manual for Erosion and Sedimentation Control in Georgia* (Georgia Soil and Water Conservation Commission, 2002).

The Selected Alternative would result in an estimated 0.0 acres of temporary impacts and 0.0 acres of permanent impacts to wetlands and open waters.

More detailed information on jurisdictional waters can be found in the SDEIS, Section 5.14; the FEIS, Section 5.14; and the FEIS Reevaluation, Attachment 2 Section B 1.

6.10 Hazardous Material

A Level II contamination assessment will be conducted at all potentially contaminated sites where right-of-way or easement is required. The assessment will be conducted by GDOT prior to acquisition of right-of-way from these parcels.

More detailed information on hazardous materials can be found in the SDEIS, Section 5.16; the FEIS, Section 5.16; and the FEIS Reevaluation, Attachment 2 Section C-4.

6.11 Construction Impacts

Mechanisms will be put in place to maintain traffic flow; minimize air quality, noise and construction lighting impacts; manage waste disposal; protect surrounding natural resources; control erosion; and handle any accidental waste spills. Affected geodetic survey markers in the project area will be properly relocated.

The FEIS included a detailed assessment of construction activities associated with the Selected Alternative based on the current level of engineering design and past experience on other large scale projects. While the techniques ultimately utilized for the project may vary to some degree, the FEIS presented the most likely, worst-case scenario for construction on the project.

More detailed information on hazardous materials can be found in the SDEIS, Section 5.17 and the FEIS, Section 5.17.

7.0 Monitoring and Enforcement Program

Coordination will be maintained with regulatory and resource agencies during final design, permitting, right-of-way acquisition, and construction to ensure that avoidance, minimization, and compensatory mitigation measures will be initiated, as required by law and as agreed to in the project Green Sheets and the project Environmental Mitigation Plan (see Appendix A). The GDOT and FHWA will enforce pertinent specifications and contract provisions in accordance with the intent of the EIS and the welfare of the public.

Specific environmental commitments are outlined in the FEIS beginning on page EC-1 and in the environmental reevaluation, also beginning on page EC-1. In addition, as part of the Developer Agreement, the P3 Developer is required to develop and implement a Comprehensive Environmental Protection Program (CEPP). The purpose of the CEPP is to establish the approach, requirements and procedures to be implemented to protect the environment and comply with all regulatory requirements as well as environmental commitments identified during the environmental review (NEPA) process. The developer also has responsibility for preparing and implementing the Environmental Compliance and Mitigation Plan (ECMP). The ECMP is a critical part of the CEPP and ensures compliance with all environmental laws and environmental approvals. The commitments in the FEIS, FEIS environmental reevaluation, the CEPP and the ECMP are binding on GDOT, FHWA and the P3 Developer.

The mitigation measures described above will be incorporated into the Developer Agreement, plans and specifications. The final detailed impact and mitigation will be based on and concurrent with the approved final design, to achieve the environmental commitments made in the ROD. The mitigation measures will be monitored in accordance with a construction monitoring plan to be developed to include all monitoring commitments included in this ROD and those required to comply with specific permits.

8.0 Responses to Comments on the FEIS/FEIS Reevaluation

The FEIS was approved by FHWA on October 12, 2011. The Notice of Availability (NOA) was published in the *Federal Register* on October 21, 2011, initiating a public review period which closed on November 21, 2011. Five letters, 17 comment cards, and 23 electronic responses were received during the comment period. Comments on the FEIS are addressed in Appendix B. In summary, comments were received on:

- Purpose and need
- Range of alternatives
- Environmental Justice
- Tolling and transportation effects
- Noise impacts
- Air quality
- Streams
- Cumulative impacts
- Design considerations
- Cost, funding and project phasing

The responses also reiterated comments provided previously, in particular project alternatives, tolling and noise impacts. All comments are provided in Appendix B.

Small group meetings were held on November 8 and 10, 2011 to disclose additional sound barriers that were included in the FEIS that were not in the SDEIS. The meetings were for property owners and dwellers who were not identified as eligible for noise abatement in the SDEIS and previous public meetings but were identified as eligible as a result of additional analysis that was conducted for the FEIS (*Northwest Corridor Project, Noise Technical Report,* Parsons Brinckerhoff, 2011). For purposes of inclusion, those invited to attend the meetings included all property owners and dwellers that were identified in the FEIS as eligible for a proposed sound barrier, as well as project stakeholders and the general public. Invitations were also extended to those property owners and dwellers that had been identified as potential displacements as a result of the construction of the project. The November 8, 2011 meeting was attended by six citizens, the November 10, 2011 meeting was attended by 20 citizens. Five comment cards and five responses recorded by the court reporter were received in response to the two meetings. Comments on received during the meetings are addressed in Appendix B. In summary, comments were received on:

- Additional need for sound barriers
- Landscape treatment
- Decorative finish for sound barriers
- Visibility of business signage behind sound barrier

The responses also reiterated comments provided previously, in particular on lack of sound barriers, visibility of signage, decorative finishes for sound barriers, and project transit alternatives. All comments are provided in Appendix B.

In the spring and summer of 2012, outreach efforts were made to communicate the current status of the project and the changes to the mode of financing for the project that have occurred; clarify any misinformation circulating about the project; build public and private trust in the process and the commitment of the State in the delivery of the project; and allow outreach audiences the opportunity to ask questions and comment. Eleven emails and one letter were

received as a result of the post-FEIS outreach. Comments received during the post-FEIS outreach are addressed in Appendix B. In summary, comments were received on:

- Relocations
- Format of the project video
- Visibility of signage behind a sound barrier
- Project funding
- Open records request

All comments are provided in Appendix B.

One letter, dated November 28, 2011 was received after the close of the FEIS comment period (November 21, 2011). The letter was from the Cumberland Improvement District and expressed continued interest in the project. This comment is also included in Appendix B.

As part of the FEIS Reevaluation, a noise impact assessment was recently conducted to reanalyze the potential impacts of highway traffic noise to properties next to or near the project area. The results of the analysis identified some properties, additional to those previously identified, that are eligible to receive a sound barrier with the construction of the proposed project. In addition, some properties that were evaluated in previous analysis have now been determined to be feasible and cost effective as a result of the new analysis. On March 19, 2013, 94 property owners and dwellers for these properties were mailed information about the location of the proposed noise walls and examples of the look and placement of sound barriers. The information package also contained an addressed, stamped comment postcard. In addition to returning the comment card, survey responses could also be emailed to the project website or left on the project hotline.

Fifteen (15) comment cards were received in response to the sound barrier mail out. In addition, a letter of support for the sound barrier at Manuel Drive (sound barrier #10-11), signed by 11 residents of Manuel Drive and Manuel Court was received. Eight (8) of the 11 also submitted comment cards. Only one respondent was not in support of a sound barrier in their location.

The FEIS Reevaluation was approved on March 18, 2013 with a public review period which closed on April 5, 2013. Eighteen (18) electronic responses were received during the comment period. Comments on the FEIS Reevaluation are addressed in Appendix B. In summary, comments were received concerning:

- Request for additional study of ETL as the preferred tolling policy
- Request for additional evaluation of the effect of tolling on environmental justice populations
- Request for more a detailed cumulative impacts analysis
- Request for a more detailed greenhouse gas emissions analysis
- Lack of complete and accurate response to all public comments
- Request for updated project cost
- Property impacts

9.0 Permits

Construction of the Selected Alternative will require the following permits and approvals. Federal funding for this project is expressly conditioned upon compliance with all permitting terms and conditions.

- USACE Section 404 Individual Permit
- USACE 401 Water Quality Certification
- No-Rise Certification for FEMA-studied Floodways other than Hope Creek and Rottenwood Creek
- Stream Buffer Variance
- NPDES Stormwater General Permit for Construction Activities
- Noise Ordinance Variance (for nighttime construction work)
- Street Use Permit

10.0 Limitation on Claims

Pursuant to Section 1308 of the Moving Ahead for Progress in the 21st Century Act (MAP-21) and 23 USC Section 139 (I)(1), the FHWA intends to publish a notice in the *Federal Register* following publication of the NEPA ROD for the proposed NWCP. This notice would indicate that the agency has taken final action with respect to compliance with NEPA for the NWCP. If such a notice is published, claims seeking judicial review of this federal action will be barred unless such claims are filed within 150 days after the publication date of the *Federal Register* notice. The period of time for filing such claims may also be limited to a shorter time period as allowed in the federal laws governing judicial review of this type of federal action. If no notice is published in the *Federal Register*, then the period of time that otherwise is provided by the federal laws governing such claims would apply. At minimum, the period of time may only be limited by the Administrative Procedures Act of 1946 (APA) [5 United States Code [USC] Section 706 et seq.], which allows claims to be filed up to six years after the federal action.

In addition, Pursuant to Section 1308 of the Moving Ahead for Progress in the 21st Century Act (MAP-21) and 23 USC Section 139 (I)(1), the FHWA intends to publish a notice in the *Federal Register* once the USACE has taken final agency action by issuing permits and approvals for the NWCP. If such a notice is published, claims seeking judicial review of this federal action will be barred unless such claims are filed within 150 days after the publication date of the *Federal Register* notice. The period of time for filing such claims may also be limited to a shorter time period as allowed in the federal laws governing judicial review of this type of federal action. If no notice is published in the *Federal Register*, then the period of time that otherwise is provided by the federal laws governing such claims would apply. At minimum, the period of time may only be limited by the APA, which allows claims to be filed up to six years after the federal action.

11.0 Conclusion

Based on the above information and after careful consideration of the input received from other agencies, organizations, and the public, FHWA has determined that the environmental studies completed for this project are in accordance with 23 CFR and 23 USC. Specifically, FHWA has determined that implementation of the Selected Alternative, as described in this ROD, is in the best overall public interest. The process of developing the Selected Alternative was inclusive of the state and federal resource agencies whose expertise and jurisdictional concerns shaped this decision.

The Two-Lane Reversible Alternative is hereby approved for implementation in accordance with the provisions of this ROD.

5-23-13

William C. Farr
Georgia Assistant Division Administrator, FHWA

Date

Appendix A Project Commitments

Environmental Mitigation Plan

Project: CSNHS-0008-00(256), P.I. No. 0008256 – Northwest Corridor Project (I-75/I-575)

Date Updated: March 8, 2013

The Northwest Corridor Project Environmental Mitigation Plan is hereby approved for implementation.

Keith Golden, P.E.

Commissioner

Georgia Department of Transportation

4-4-13

Date

ENVIRONMENTAL COMMITMENTS-
PROJECT GREEN SHEETS

ENVIRONMENTAL COMMITMENTS TABLE

Project Information

Project No.:	CSNHS-0008-00(256)
County :	Cobb & Cherokee
PI No.:	0008256
Status:	FEIS Re-Evaluation
Date Updated:	March 8, 2013

Project Manager Review

☒ I have reviewed these commitments and verified their feasibility.

☐ All delineations are marked on the plans.

Daryl O. Van Meter — March 8, 2013

PM Signature — Date

Specialist Review

Air/Noise	KJ
Archaeology	KJ
Ecology/404	KJ
History	KJ
NEPA	KJ

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
Pre-Construction Commitments							
1	All Waters of the U.S., state waters, and stream/pond buffers will be shown on the plans and appropriately labeled.	Memo to project designer	GDOT District	No cost	Yes	No	Incomplete
2	Stream buffer variances will be obtained for Streams 4, 8, and 16 prior to project implementation.	FEIS Re-evaluation/Ecology Technical Report 2013 Addendum	Office of Environmental Services/ P3 Developer	No cost	No	No	Incomplete
3	Include Special Provision (SP) 107.23G for the protection of migratory bird species and the protection of the federally endangered Indiana bat (*Myotis sodalis*), gray bat (*Myotis grişescens*), the federally threatened Cherokee darter (*Etheostoma scotti*), the state-listed Chattahoochee crayfish (*Cambrus howardii*), highscale shiner (*Notropis hypsilepis*), bluestripe shiner (*Cyprinella callitaenia*), delicate spike (*Elliptio arctata*), and lined chub (*Hybopsis lineapunctata*) in the P3 Developer Agreement.	FEIS Re-evaluation/Ecology Technical Report 2013 Addendum	Office of Innovative Program Delivery	No cost	No	Yes	Incomplete

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
4	Mitigation for the unavoidable 3,309 linear feet of permanent stream impacts (a total of 9,944.85 stream mitigation credits) will be provided by using an USACE-approved commercial mitigation bank or GDOT-owned bank serving HUC 03130001 and HUC 03150104.	FEIS Re-evaluation/Ecology Technical Report 2013 Addendum	Office of Environmental Services	$1,366,302	No	No	Incomplete
5	A USACE Section 404 Individual Permit will be acquired prior to project implementation.	FEIS	Office of Environmental Services/ P3 Developer	No cost	No	No	Incomplete
6	A NPDES permit will be acquired prior to construction.	FEIS	Office of Construction/ P3 Developer	No cost	No	No	Incomplete
7	Coordination with FEMA, Cobb and Cherokee Counties, and GDNR will be conducted regarding the impacts to regulatory floodways. Hope Creek, Rottenwood Creek, Sope Creek and Elizabeth Branch will require a FEMA no-rise certification. Prior to construction, an approved FEMA CLOMR will be required for Hope Creek and Rottenwood Creek. Issuance of a LOMR by FEMA will be required after construction is complete. The P3 Developer will prepare the final hydraulic analysis using the most current hydraulic information available.	FEIS	Office of Environmental Services/ Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Incomplete
8	The P3 Developer shall design the project to minimize impacts to floodplains. These features should include bridge structures over streams, increasing the slope ratio at the 100-year floodplain crossings, and placing retaining walls at the 100-year floodplain crossings.	FEIS	Office of Environmental Services/ Office of Innovative Program Delivery	TBD	No	No	Incomplete

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
9	A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners and dwellers. Coordination with property owners and dwellers regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers. Public involvement will be conducted in accordance with the approved public involvement plan for the project.	FEIS/Noise Technical Report	Office of Environmental Services / P3 Developer	TBD	No	No	Incomplete
10	Design features that may aid emergency access will be considered during future stages of project design.	FEIS	Office of Innovative Program Delivery	No cost	No	No	Incomplete
11	The height of both structural walls and sound barriers will be mitigated visually through the use of context-sensitive aesthetic finishes or treatments and, where possible, landscaping. Community outreach to this end will be implemented during final design.	FEIS	Office of Environmental Services / P3 Developer	TBD	No	No	Incomplete
12	A detailed financial plan for the Northwest Corridor Project will be developed by GDOT and approved by FHWA. Access to the managed-lane facility by disadvantaged persons will be included in the financial plan. The P3 Developer accounting related to the Northwest Corridor Project will be subject to GDOT audits.	FEIS	Office of Financial Management and GDOT Financial Advisor	No cost	No	No	Incomplete

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
13	Cash-based and cash preferred customer solutions will be implemented to facilitate toll lane access to those who may need or prefer to purchase Peach Pass accounts with cash and in person rather than online and with a credit card. These cash-based and cash-preferred customer solutions will also entail providing additional locations for Peach Pass purchase, including retail outlets. In addition, minimum required initial values and reload amounts for the Peach Pass will occur. Finally, the transaction cost associated with reloading the card will be set to minimize the financial impact to cash-based and cash-preferred customers.	FEIS	SRTA/ P3 Developer/ Office of Innovative Program Delivery	No cost	No	No	Incomplete
14	A public information and notification plan to provide project information, updates, and construction information to community businesses and residents will be developed and maintained throughout project development. The plan will address the project through design, construction and operations.	FEIS/Public Involvement Plan	Office of Environmental Services / P3 Developer	None	No	No	Incomplete
15	The project mailing list initiated during the AA/DEIS will be maintained, updated, and kept current throughout final design and construction activities to ensure all interested citizens will be notified about meetings and project news	FEIS/Public Involvement Plan	Office of Environmental Services / P3 Developer	$0.00	No	No	Incomplete

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
16	The P3 Developer, working collaboratively with GDOT, will furnish facility-related materials in multi-lingual communications not limited to English, Spanish, Portuguese, and other languages.	FEIS/P3 Developer Agreement	Office of Environmental Services / P3 Developer	TBD	No	No	Incomplete
17	A detailed construction noise mitigation plan will be developed prior to the initiation of construction.	FEIS/Noise Technical Report	Office of Environmental Services P3 Developer	No cost	No	No	Incomplete
18	A mitigation plan for the extended duration of potential 24-hour effects from construction-related noise, light, glare, and dust will be developed. The plan will be coordinated with neighborhood groups, including residents living in close proximity to the project corridor construction zone and staging areas.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Incomplete
19	Eligible historic boundary for the Marietta and North Georgia Railroad (i.e., the right-of-way of the railroad mainline) and the Dobson Gulf Service Station-Marietta Muffler will be included on all plans. No construction will occur within the historic boundaries.	Email from Chad Carlson , GDOT Historian, dated 8/27/10	Office of Innovative Program Delivery/ P3 Developer	No cost	Yes	No	Incomplete
20	A Level II contamination assessment will be conducted at all sites where right-of-way is required.	FEIS	Office of Innovative Program Delivery/ Office of Materials and Research/ P3 Developer	No cost	No	No	Incomplete
21	Prior to construction, GDOT, the P3 Developer, and agencies that provide emergency response will prepare an emergency response plan that addresses coordination with construction activities and emergency responders.	FEIS/P3 Developer Agreement	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Incomplete

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
22	Prior to construction, NOAA shall be provided no less than a 90-day notification of planned activities that will disturb or destroy any geodetic control monuments. This will provide time to plan for and execute relocation of geodetic monuments.	Letter from Christopher Harm, NOAA National Geodetic Survey, dated July 10, 2007	Office of Innovative Program Delivery/ P3 Developer	TBD	Yes	No	Incomplete
23	An environmental mitigation plan for the Northwest Corridor Project will be developed and will include mitigation items cited in the FEIS and the ROD.	GDOT	Office of Environmental Services/ Office of Innovative Program Delivery	No cost	No	No	Incomplete
24	Meetings will be conducted with the public regarding potential detours. The meetings will be conducted in accordance with GDOT public involvement procedures.	GDOT	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Incomplete
25	Placement of advance toll signage will avoid any waters of the U.S.	Advance Toll Signage Technical Report	Office of Innovative Program Delivery/ P3 Developer	No Cost	Yes	No	Incomplete
49	The US Fish and Wildlife Service (USFWS) will be provided with the stormwater control and infiltration plan prior to finalization of the construction plans.	Environmental Reevaluation/P3 Developer Agreement	Office of Environmental Services/ Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Incomplete

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
During Construction Commitments Construction or Area Engineer signature required upon the completion of all During Construction Commitments.							
26	Special Provision (SP) 107.23G for the protection of migratory bird species and the protection of the federally endangered Indiana bat (*Myotis sodalis*), gray bat (*Myotis grisescens*), the federally threatened Cherokee darter (*Etheostoma scotti*), the state-listed Chattahoochee crayfish (*Cambrus howardii*), highscale shiner (*Notropis hypsilepis*), bluestripe shiner (*Cyprinella callitaenia*), delicate spike (*Elliptio arctata*), and lined chub (*Hybopsis lineapunctata*) will be implemented.	FEIS Re-evaluation/Ecology Technical Report 2013 Addendum	Office of Innovative Program Delivery/ P3 Developer	No cost	No	Yes	Signature Required
27	Pedestrian and bicycle traffic on the Bob Callan Trail will be maintained by means of an approved traffic control plan during construction of proposed bridges. Conditions to be provided in the Transportation Management Plan (TMP). Precautions will be taken to ensure the safety of the trail users during construction. The trail facility will not be used for construction staging. Construction of the managed lanes over Bob Callan Trail will be of limited duration. Construction of the proposed bridge widening will occur at night when the trail is closed. The trail will remain open during the day during normal operating hours. No change in ownership will take place to any parkland. Any impact to the Bob Callan Trail due to P3 Developer construction activities will be mitigated by restoring the Trail to pre-construction conditions.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No cost	Yes	No	Signature Required

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
28	A public information and notification plan/program to provide project information/ updates/construction information to community businesses and residents during construction and operations will be implemented.	FEIS	Office of Innovative Program Delivery/ P3 Developer	None	No	No	Signature Required
29	The project mailing list initiated during the AA/DEIS will be maintained, updated and kept current throughout construction activities to ensure all interested citizens will be notified about meetings and project news.	FEIS	Office of Innovative Program Delivery/ P3 Developer	None	No	No	Signature Required
30	The P3 Developer, working collaboratively with GDOT, will furnish facility-related materials in multi-lingual communications not limited to English, Spanish, Portuguese, and other languages.	FEIS/P3 Developer Agreement	Office of Innovative Program Delivery/ P3 Developer	No costs	No	No	Signature Required
31	Variances, special permits, or approval may be required by Cobb and Cherokee counties or local municipalities, if construction occurs during nighttime hours and/or on Sundays. Any necessary variances to noise ordinances will be obtained prior to construction.	FEIS/Noise Technical Report	Office of Innovative Program Delivery/ P3 Developer	No costs	No	No	Signature Required
32	Construction activities will be scheduled so that property access and utility disruptions are anticipated, scheduled in advance, and are as brief as possible. Advance notification for such disruptions will be provided to affected property owners and businesses.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No costs	No	No	Signature Required
33	Deliveries of construction materials will be scheduled to minimize disruptions to surrounding land uses.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No costs	No	No	Signature Required

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
34	A mitigation plan for the extended duration of potential 24-hour effects from construction-related noise, light, glare, and dust will be implemented.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No costs	No	No	Signature Required
35	No equipment and materials lay down and staging areas will be located within 500 yards of Olde Rope Mill Park.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No costs	No	No	Signature Required
36	The P3 Developer shall comply with all state and local sound control and noise level rules, regulations, and ordinances.	FEIS/Noise Technical Report	Office of Innovative Program Delivery/ P3 Developer	No costs	No	No	Signature Required
37	The following noise abatement measures will be implemented during construction: • Keep the public informed when work is going to be done; • Keep a telephone log of complaints and how they were resolved • Limit the number and duration of onsite idling equipment; • Maintain all construction equipment in good repair; • Reduce noise from all stationary equipment and facilities by using suitable enclosures; • Schedule truck loading, unloading and handling operations to minimize construction site noise.	FEIS/Noise Technical Report	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Signature Required

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
38	The following standard preventive BMP measures will be implemented during construction to minimize the amount of construction dust generated: • Minimize land disturbance; • Use watering trucks to minimize dust; • Cover trucks when hauling dirt; • Stabilize surface of dirt piles if not removed immediately; • Limit vehicular paths and stabilize these temporary roads.	FEIS/Air Quality Technical Report	Office of Innovative Program Delivery/ P3 Developer	No Cost	No	No	Signature Required
39	The following BMP measures will be implemented to the extent practicable to minimize greenhouse gas emissions during construction: • Reduce equipment idle time; • Reduce fuel usage through increased fuel efficiency; • Use alternative fuels; • Properly maintain equipment; • Provide driver training to improve operating efficiency; • Use properly sized equipment; • Replace older, less fuel efficient equipment with newer, more efficient equipment; • Reuse/recycle waste construction materials.	FEIS/Air Quality Technical Report	Office of Innovative Program Delivery/ P3 Developer	No Cost	No	No	Signature Required

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
40	The following BMP measures will be implemented during construction in order to minimize worker exposure to diesel exhaust: • Position exhaust pipes so that diesel fumes are directed away from the operator and nearby workers; • Routine inspection and maintenance of filtration devices.	FEIS/Air Quality Technical Report	Office of Innovative Program Delivery/ P3 Developer	No Cost	No	No	Signature Required
41	The following measures will be implemented to the extent practicable to minimize worker exposure to diesel exhaust during construction: • Use low-sulphur diesel fuel; • Retrofit engines with exhaust filtration devices to capture diesel particulate matter; • New equipment should be equipped with the most advanced emission control system available.	FEIS/Air Quality Technical Report	Office of Innovative Program Delivery/ P3 Developer	No Cost	No	No	Signature Required
42	Where possible, lane closures will be limited to nighttime periods or on weekends.	FEIS/P3 Developer Agreement	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Signature Required
43	Where possible, construction on the cross streets and highway ramps will take place during off-peak periods.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Signature Required
44	A project hotline number will be provided and a field office or mobile trailer will be opened within Cobb County so that any and all members of the public can directly report problems related to construction activities, and ensure problems will be resolved promptly.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Signature Required

*Estimated cost for planning purposes only; in current dollars as of date updated.

NO.	COMMITMENT/REQUIREMENT *(Separate out commitments by PI No.)*	DOCUMENT STIPULATED IN	RESPONSIBLE PARTY	ESTIMATED COST*	PLACE ON PLANS *(Yes or No)*	REQUIRES A SPECIAL PROVISION *(Yes or No)*	STATUS *(Pre- and Post Construction – Complete or Incomplete; During Construction – Signature Required)*
45	The P3 Developer shall comply with the emergency response plan that is created by GDOT, the P3 Developer, and agencies that provide emergency response.	FEIS/P3 Developer Agreement	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Signature Required
46	Construction and installation activities for the advance toll signage shall avoid impacts to waters of the U.S.	Advance Toll Signage Technical Report	Office of Innovative Program Delivery/ P3 Developer	No cost	Yes	No	Signature Required
47	A federal and state compliant relocation assistance program will be available to displaced persons and businesses. The program will comply with requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and the Georgia Relocation Assistance and Land Acquisition Policy Act.	FEIS	Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Signature Required
48	A limited due diligence transaction screening investigation (American Society for Testing and Materials [ASTM] E1528) will be conducted for all properties immediately prior to purchase.	FEIS	Office of Environmental Services/ Office of Innovative Program Delivery/ P3 Developer	No cost	No	No	Signature Required
Post Construction Commitments							
50	Annual surveys of users over a three-year period will be conducted; dissemination of monitoring information will be provided on the State Road and Tollway Authority (SRTA) and GDOT websites. While the data gathered from these surveys may not enable near-term mitigation with this particular toll project, it will be available to assist in making decisions about any future toll-related projects that might be studied in the future.	FEIS	Office of Innovative Program Delivery	No Cost	No	No	Signature Required
Total Estimated Cost* for all Project Commitments:				TBD			

*Estimated cost for planning purposes only; in current dollars as of date updated.

From: Pomfret, Jim
Sent: Thursday, January 03, 2013 3:26 PM
To: Jackson, Keisha
Subject: RE: NWC Commitment Table

Good for archeo

Jim Pomfret
Archaeology Team Leader
Georgia Department of Transportation
Office of Environmental Services
600 West Peachtree Street, NW
Atlanta, GA 30308
Phone: 404.631.1256
Cell: 404.314.0669
Fax: 404.631.1916

From: Jackson, Keisha
Sent: Wednesday, January 02, 2013 8:42 AM
To: Carlson, Chad; Collazo, Jaime; Pomfret, Jim
Subject: NWC Commitment Table

Hello: Please take a look at the attached commitment table (ignoring the format which will not be changing) and email me your concurrence or comments by 1/8 (Tuesday).

Thanks!!!

Keisha L.. Jackson
Georgia Department of Transportation
Office of Environmental Services
KeiJackson@dot.ga.gov
(404)631-1160

16th Floor, One Georgia Center
600 West Peachtree Street, N.W.
Atlanta, Georgia 30308


Please consider the environment - do you really need to print this email?

From: Carlson, Chad
Sent: Tuesday, March 12, 2013 11:41 AM
To: Palmer, Roger
Cc: Jackson, Keisha
Subject: RE: NWCP - FEIS Reevaluation - Project No. CSNHS-0008-00(256); P.I. 0008256

I concur for history.

From: Palmer, Roger [mailto:Palmer@pbworld.com]
Sent: Tuesday, March 12, 2013 11:18 AM
To: Carlson, Chad
Cc: Jackson, Keisha; Hancock, John; Welch, Albert (Butch); Moses, Robert; Birch, Valerie
Subject: NWCP - FEIS Reevaluation - Project No. CSNHS-0008-00(256); P.I. 0008256

Chad,

The current environmental commitment table for the NWC Project as shown in the FEIS Reevaluation is attached. Commitment # 19 has been revised to include the historic resource: Dobson Gulf Service Station–Marietta Muffler, as requested.

Please let me know if you have any questions.

Thanks,
Roger

Roger A. Palmer, P.E.
Project Manager
Parsons Brinckerhoff
3340 Peachtree Rd NE
Tower Place 100
Atlanta, GA 30326
404 364-2658 (office)
404 661-9087 (cell)

palmer@pbworld.com

www.pbworld.com

From: Collazo, Jaime
Sent: Monday, March 11, 2013 8:40 AM
To: Jackson, Keisha
Cc: Welch, Albert (Butch); Hancock, John
Subject: RE: NWCP - Green Sheets Signature/Initialization Page

I concur with the commitments for Ecology/404.

Thanks,

Jaime M. Collazo, Ecologist
Office of Environmental Services
Georgia Department of Transportation
One Georgia Center
600 West Peachtree Street, NW
16th Floor
Atlanta, GA 30308
404-631-1740

From: Jackson, Keisha
Sent: Friday, March 08, 2013 4:10 PM
To: Collazo, Jaime
Cc: Welch, Albert (Butch); Hancock, John
Subject: RE: NWCP - Green Sheets Signature/Initialization Page

Thank you for the quick response! Since we have them /it in hand, we didn't add to say it's complete. If this is ok, would reply again with the approval?

Keisha Jackson
Georgia Department of Transportation
16 Floor, One Georgia Center
KeiJackson@dot.ga.gov
(404)631-1160

From: Collazo, Jaime
Sent: Friday, March 08, 2013 2:59 PM
To: Jackson, Keisha; Pomfret, Jim; Carlson, Chad
Cc: Welch, Albert (Butch); Hancock, John
Subject: RE: NWCP - Green Sheets Signature/Initialization Page

The commitments table doesn't include Section 7 and FWCA concurrences. Otherwise, looks OK for Ecology/404.

Jaime M. Collazo, Ecologist
Office of Environmental Services
Georgia Department of Transportation
One Georgia Center
600 West Peachtree Street, NW

16th Floor
Atlanta, GA 30308
404-631-1740

From: Jackson, Keisha
Sent: Friday, March 08, 2013 1:21 PM
To: Pomfret, Jim; Carlson, Chad; Collazo, Jaime
Cc: Welch, Albert (Butch); Hancock, John
Subject: FW: NWCP - Green Sheets Signature/Initialization Page

Hello: Please take a look at the attached commitment table. (We're not updating the format.) if possible I really need your comments or ok this afternoon. I SINCERELY apologize for the request for immediate action.

Keisha Jackson
Georgia Department of Transportation
16 Floor, One Georgia Center
KeiJackson@dot.ga.gov
(404)631-1160

Please consider the environment - do you really need to print this email?

From: Moses, Robert [mailto:Moses@pbworld.com]
Sent: Friday, March 08, 2013 12:46 PM
To: Hancock, John; Welch, Albert (Butch); Jackson, Keisha
Cc: VanMeter, Darryl; Birch, Valerie; Palmer, Roger
Subject: NWCP - Green Sheets Signature/Initialization Page

In case this can be initialed now.

Robert R. Moses, PE
Senior Supervising Engineer / Regional Manager - TEC Civil
Parsons Brinckerhoff
3340 Peachtree Road
Suite 2400, Tower Place 100
Atlanta, Georgia 30326
404-364-2674 (office)
678-640-7240 (cell)

moses@pbworld.com

www.pbworld.com

MITIGATION PLAN

ENVIRONMENTAL MITIGATION PLAN

NORTHWEST CORRIDOR PROJECT

Federal Highway Administration

Georgia Department of Transportation

CSNHS-0008-00(256), PI No. 0008256

Cobb and Cherokee Counties

March 8, 2013

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

1.0 INTRODUCTION

1.1 National Environmental Policy Act

The National Environmental Policy Act of 1969 (NEPA) applies to federal actions and requires federal agencies to examine the environmental effects of their proposed actions. For example, if federal money or permits are required, then NEPA compliance is required. An Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) documenting potential environmental impacts was prepared for the Northwest Corridor (NWC) Project. The AA/DEIS was approved and released to the public in April 2007. Public hearings on the AA/DEIS were held in May and June 2007.

Consistent with the substantive comments on the AA/DEIS and reconsideration of the financial feasibility of the alternatives evaluated in the AA/DEIS, GDOT determined that the alternatives for the proposed Northwest Corridor Project evaluated in the AA/DEIS needed to be refined in response to changed conditions. As a result, a Supplemental Draft Environmental Impact Statement (SDEIS) was prepared. The SDEIS was approved and released to the public in September 2010. Public hearings on the SDEIS were held in October 2010.

The Final Environmental Impact Statement (FEIS) identifying the preferred alternative was approved and released to the public in October 2011. The Record of Decision (ROD) is the final step in the EIS process. The ROD states what the decision is, identifies the alternatives considered, and discusses mitigation, including any enforcement and monitoring commitments.

1.2 Project Description

Under the Selected Alternative, the existing managed lanes (i.e., HOV lanes) will be extended north of Akers Mill Road on both I-75 and I-575. The managed lanes will terminate just north of Hickory Grove Road and south of Sixes Road, respectively, and will be tolled reversible lanes. Between I-285 and I-575, there will be two reversible lanes. North of I-575, there will be a single reversible lane on both I-75 and I-575. The selected tolling policy for the managed lanes is Express Toll Lanes (ETL) meaning all non-exempt vehicles will pay a toll to use the managed lanes regardless of occupancy. Exempt vehicles include military vehicles, registered transit vehicles, emergency vehicles and school buses.

The Northwest Corridor Project does not follow a traditional project delivery process. The project will be delivered through a public-private partnership (P3) procurement utilizing a design-build-finance delivery option. A P3 procurement leverages limited transportation funds through a partnership with the private sector to provide both private investment and innovation. The P3 Developer will be responsible for the design, construction and some initial funding of the project. Responsibility for operations, maintenance, tolling and long-term financing will be retained by the State.

With a P3 process, there is a sharing of responsibility for project implementation. Under the P3 procurement process, the State will sign a contractual agreement with the Developer. In general, the Developer will largely be responsible for the implementation of the project and GDOT will largely be responsible for operations and ensuring compliance with measures

identified in the Record of Decision (ROD) and all applicable environmental laws. The Developer essentially operates as GDOT's agent through construction; however the ultimate responsibility for all environmental matters rests with GDOT.

2.0 SCHEDULE

Figure 1 shows a timeline for the NWC Project, beginning with the environmental review process and extending through construction to opening.

3.0 ROLES AND RESPONSIBILITIES

The GDOT is responsible for operations of the project, ensuring compliance with measures identified in the ROD and all applicable environmental laws. The P3 Developer will be responsible for the implementation of the project. Table 1 lists the responsible parties, the scope of responsibility and the tracking and reporting method.

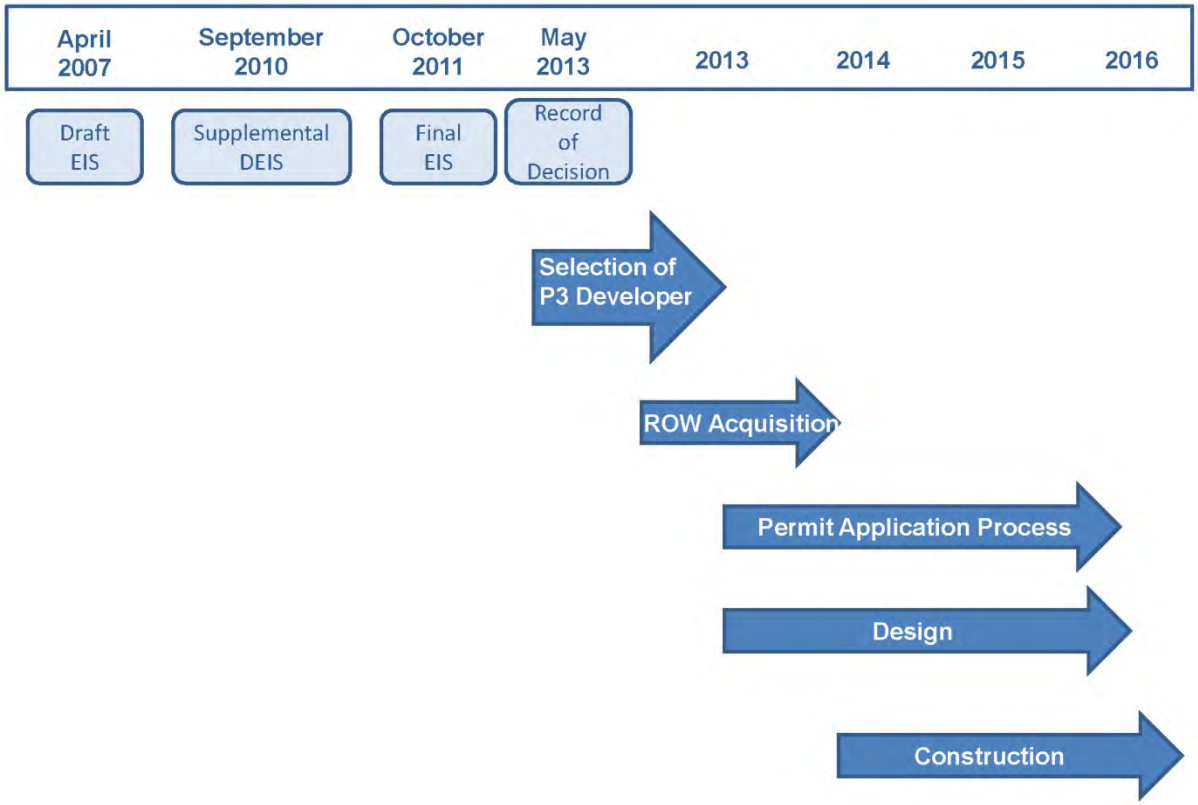


Figure 1 Estimated Schedule for the NWC Project

Table 1. Roles and Responsibilities

Responsible Party	*Scope of Responsibilities*	*Tracking and Reporting Method*
GDOT	Enforcement and oversight of mitigation measures during design and construction. Execution of mitigation measures after construction.	The GDOT PM will utilize the *Environmental Management System (EMS)* to track compliance with the environmental commitments.
P3 Developer	Execution of mitigation measures during design and construction.	The Developer will follow procedures defined in the *Environmental Compliance and Mitigation Plan (ECMP)* and will track compliance utilizing an *Environmental Management System (EMS).*
FHWA	Oversight	Review documentation

4.0 MITIGATION MEASURES

4.1 Definition

A mitigation measure is an action that is implemented to avoid, minimize, rectify, reduce/eliminate, or provide compensation for an environmental impact.

4.2 Evolution of Mitigation Measures

Mitigation measures identified in the ROD will continue to evolve as the project proceeds. Environmental requirements can change or emerge after the issuance of the ROD as a result of agency consultations, public outreach, permit conditions, design modifications, P3 final design, and the enactment of new laws, regulations and policies. Design modifications could result in the need for environmental reevaluations. In addition, permit conditions may contain new mitigation measures and best management practices for projects. Figure 2 shows the factors that can influence mitigation measures.

The project will be delivered through a P3 procurement with a design-build-finance delivery option. As a result, in addition to mitigation commitments stated in the ROD, the P3 Developer will also be required to develop, operate and maintain a Comprehensive Environmental Protection Program (CEPP) to ensure environmental compliance with all applicable environmental laws and commitments. One of the requirements of the CEPP includes the development of a post-ROD Environmental Compliance and Mitigation Plan (ECMP) to track the implementation of mitigation measures. GDOT will be responsible for ensuring compliance with the plan.

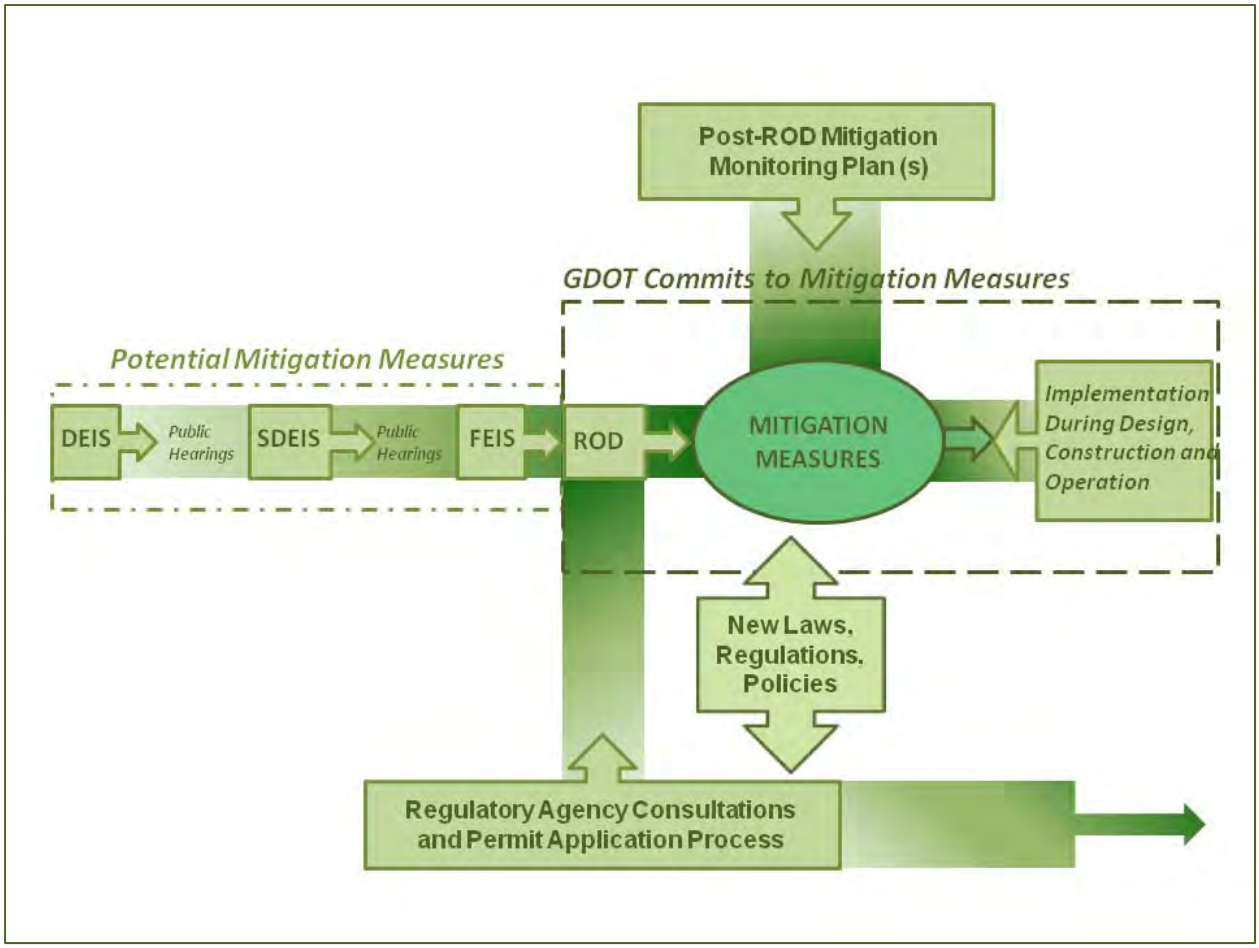


Figure 2 Evolution of Mitigation Measures

4.3 Implementation of Mitigation Measures

Environmental Commitments Specified in the Record of Decision

A number of environmental commitments have been incorporated into the ROD for the mitigation of potential environmental impacts anticipated as a result of the development of the NWC Project. These commitments have been developed throughout the project development process and were coordinated with the GDOT offices responsible for carrying them out. They are documented in an Environmental Commitments Table, also referred to as the Green Sheets. The commitments are divided into sections based on the category of the commitment and mitigation. The GDOT is legally bound to fulfill all commitments made in the Green Sheets.

Table 2 describes the framework for monitoring and tracking mitigation measures that will be implemented by GDOT and the Developer as part of the NWC EIS/ROD. Mitigation measures represent actions that must be incorporated into the most appropriate phase of project planning in order to avoid, minimize, rectify, reduce/eliminate, or provide compensation for an environmental impact that would occur otherwise. To achieve this objective, the mitigation measure is either programmatic in nature or can be incorporated into the design, construction or

operational phase of the project. For most mitigation measures that comprise actions during construction, it will be necessary to include the measure in the design phase. This is because specifications and design packages must include these actions and the measure must be carried out during the construction phase.

This Environmental Mitigation Plan document is a public disclosure document to record all anticipated impacts as a result of the project.

Mitigation Required by Developer Contractual Agreement

The P3 Developer is bound to environmental commitments through the *Contractual Agreement.* As part of the *Contractual Agreement*, the Developer is required to develop and implement a Comprehensive Environmental Protection Program (CEPP). The purpose of the CEPP is to establish the approach, requirements and procedures to be implemented to protect the environment and comply with all regulatory requirements as well as environmental commitments identified during the NEPA process. At a minimum, the CEPP is required to include the following components:

- Environmental Management System (EMS)
- Environmental Compliance and Mitigation Plan (ECMP)
- Environmental Protection Training Plan (EPTP)
- Hazardous Materials Management Plan (HMMP)
- Communication Plan (CP)
- Construction Monitoring Plan (CMP)
- Recycling Plan (RP)

The ECMP is a critical part of the CEPP and assigns responsibilities in detail, establishes mechanisms and identifies timing to ensure compliance with all environmental laws and environmental approvals. The ECMP also incorporates the environmental commitments specified in the ROD.

4.4 Tracking Implementation of Mitigation Measures

To document the implementation and progress of the mitigation measures throughout the duration of the project, a Mitigation Measure Status Report form will be utilized by GDOT and the P3 Developer. GDOT will be responsible for completing the forms for post-construction mitigation commitments and for any mitigation commitments associated with the right-of-way phase. The P3 Developer will be responsible for completing the forms for pre-construction and construction mitigation commitments.

The information provided on the forms will be entered into an Environmental Management System (EMS) that will be developed by the P3 Developer for the NWC Project. The EMS will be an electronic, web-based system with access 24-hours, 7 days per week during the construction process. GDOT and FHWA will have access to the EMS. The P3 Developer will deliver the EMS to GDOT at the completion of construction so that GDOT can then track post-construction commitments.

Mitigation Measure Status Report Form

The monitoring and completion of each mitigation measure will be documented on the Mitigation Measure Status Report form. This form will be completed by the party responsible for implementing the mitigation measure. Supplemental record keeping, report preparation and documentation may be required for specific mitigation measures. The form will be completed by the appropriate person who can confirm that the information on the form is accurate and reflects the status of the mitigation measure. The P3 Developer will prepare and deliver monthly mitigation measure status reports that will be submitted to GDOT and FHWA.

Environmental Management System

Information from Mitigation Measure Status Reports will be entered into the Environmental Management System to show status. This will enable GDOT managers to compare status to schedules and estimated completion dates. The database will display planning elements for each mitigation measure. The database will include scheduling information that reflects the estimated completion date for each measure. The database will be updated by GDOT personnel upon receipt of monthly Mitigation Measure Status Reports.

Compliance Reporting and Audits

Monthly audits will be conducted by GDOT's Office of Innovative Program Delivery to ensure that mitigation measures are being implemented. Adequate and sufficient records need to be maintained in order to provide documentation of compliance.

A successful audit of compliance with mitigation measures can be achieved when:

- Accurate mitigation measure implementation and status information is readily available
- Documentation on the implementation of mitigation measure is complete
- Mitigation measure tracking and reporting is being carried out in accordance with the approved mitigation monitoring plan

The results of the audit may be used to identify insufficient progress in incorporating or implementing mitigation measures. In that case, FHWA and GDOT may consider requiring corrective action from the contractor for any major audit findings to establish preventive action. A follow-up audit may be conducted to ensure that corrective actions for all audit findings are completed and adequately addressed.

Table 2 Environmental Commitments

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
Environmental Mitigation Plan					
EC-23	An environmental mitigation plan for the Northwest Corridor Project will be developed and will include mitigation items cited in the FEIS and the ROD.	This document, Environmental Mitigation Plan – Northwest Corridor Project, is the environmental mitigation plan. This document will be an attachment to the ROD.	Developed by GDOT and approved by FHWA.	Plan approved prior to signing of the ROD	GDOT Office of Environmental Services
Financial Plan					
EC-12	A detailed financial plan for the Northwest Corridor Project will be developed by GDOT and approved by FHWA. The P3 Developer accounting related to the Northwest Corridor Project will be subject to GDOT audits.	The P3 Developer accounting related to the project will be subject to annual audits by GDOT. GDOT will also conduct an audit at completion of construction.	Plan will be developed by GDOT and approved by FHWA. P3 Developer will maintain project accounting through design and construction.	Plan approved prior to signing of the ROD Plan approved prior to P3 Developer contract award	GDOT Office of Innovative Program Delivery
Relocations					
EC-47	A federal and state compliant relocation assistance program will be available to displaced persons and businesses. The program will comply with requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and the Georgia Relocation Assistance and Land Acquisition Policy Act.	GDOT, not the P3 Developer, will prepare the Right of Way Plans and acquire the right of way.	GDOT Right-of-Way Office	GDOT will begin to acquire right of way in 2013 and will complete acquisition before construction begins.	GDOT Right-of-Way Office

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
Public Information and Outreach					
EC-14	A public information and notification plan to provide project information, updates, and construction information to community businesses, traveling public and residents will be developed and maintained throughout project development. The plan will address the project through design, construction and operations.	GDOT will specify requirements for the public information and notification plan in the RFP to bidders.	Selected P3 Developer will implement during design and construction; GDOT and SRTA will implement after construction.	Prior to construction.	Project website GDOT Communications P3 Developer
EC-28	A public information and notification plan/program to provide project information/ updates/construction information to community businesses, traveling public and residents during design,construction and operations will be implemented.	GDOT will specify requirements for the public information and notification plan in the RFP to bidders. GDOT's Office of Innovative Program Delivery will conduct monthly reviews to ensure that the plan is being implemented during construction.	Selected P3 Developer will implement during design and construction; GDOT and SRTA will implement after construction.	During construction.	Project website GDOT Communications P3 Developer
EC-15	The project mailing list initiated during the AA/DEIS, SDEIS, FEIS, and reevaluation of the FEIS will be maintained, updated, and kept current throughout final design and construction activities to ensure all interested citizens will be notified about meetings and project news	GDOT will maintain the project mailing list. GDOT will provide the P3 Developer with the most current mailing list as needed for project mailings/ notifications. P3 Developer will provide GDOT with any updates to the mailing list that it receives.	GDOT	Before construction.	Project website GDOT Communications P3 Developer

Impact Area / Commitment Number	***Commitment / Requirement***	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
EC-29	The project mailing list initiated during the AA/DEIS, SDEIS, FEIS, and reevaluation of the FEIS will be maintained, updated and kept current throughout construction activities to ensure all interested citizens will be notified about meetings and project news.	GDOT will maintain the project mailing list. GDOT will provide the P3 Developer with the most current mailing list as needed for project mailings/ notifications. P3 Developer will provide GDOT with any updates to the mailing list that it receives.	GDOT	During construction.	Project website GDOT Communications P3 Developer
EC-16	The P3 Developer, working collaboratively with GDOT, will furnish facility-related materials in multi-lingual communications not limited to English, Spanish, Portuguese, and other languages.	A project-specific toll-free telephone number will be established by GDOT. The attached voice mail system will allow callers to hear their options in either English (press 1) or Spanish (press 2) similar to SRTA's Peach Pass telephone number (1-855-PCH-PASS). For this project the options will also be provided in Portuguese (press 3). GDOT will determine which materials will be provided in which languages.	GDOT's Office of Innovative Program Delivery	During design.	GDOT's Office of Innovative Program Delivery
EC-30	The P3 Developer, working collaboratively with GDOT, will furnish facility-related materials in multi-lingual communications not limited to English, Spanish, Portuguese, and other languages.	The project-specific toll-free telephone number established by GDOT will be maintained through construction of the project. GDOT will determine which materials will be provided in which languages.	GDOT's Office of Innovative Program Delivery	During construction.	GDOT's Office of Innovative Program Delivery

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
Emergency Services					
EC-10	Design features that may aid emergency access will be considered during future stages of project design.	GDOT is holding a project meeting with first responders in July 2012. Required design features will be specified in the RFP to developers.	GDOT will specify requirements in the RFP; P3 Developer will design	Before construction.	GDOT's Office of Innovative Program Delivery
EC-21	Prior to construction, GDOT, the P3 Developer, and agencies that provide emergency response will prepare an emergency response plan that addresses coordination with construction activities and emergency responders.	The emergency response plan will be prepared and then monitored and updated based on construction activities/schedule.	P3 Developer and GDOT	Initiated prior to construction and updated as necessary.	GDOT's Office of Innovative Program Delivery
EC-45	The P3 Developer shall comply with the emergency response plan that is created by GDOT, the P3 Developer, and agencies that provide emergency response.	The emergency response plan will be monitored and updated based on construction activities/schedule.	P3 Developer with GDOT oversight	During construction.	GDOT's Office of Innovative Program Delivery

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
Environmental Justice (EJ)					
EC-13	Cash-based and cash preferred customer solutions will be implemented to facilitate toll lane access to those who may need or prefer to purchase Peach Pass accounts with cash and in person rather than online and with a credit card. These cash-based and cash-preferred customer solutions will also entail providing additional locations for Peach Pass purchase, including retail outlets. In addition, minimum required initial values and reload amounts for the Peach Pass will occur. Finally, the transaction cost associated with reloading the card will be set to minimize the financial impact to cash-based and cash-preferred customers.	A cash-option, walk-in customer service centers will be implemented. (See Appendix pages 3-7)	GDOT and SRTA	Established and operational before opening of facility.	GDOT Office of Innovative Program Delivery
EC-50	Annual surveys of users over a three-year period will be conducted; dissemination of monitoring information will be provided on the State Road and Tollway Authority (SRTA) and GDOT websites. While the data gathered from these surveys may not enable near-term mitigation with this particular toll project, it will be available to assist in making decisions about any future toll-related projects that might be studied in the future.	GDOT will conduct this study in conjunction with SRTA.	GDOT and SRTA	Annually for 3 years after project opening.	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	*Commitment / Requirement*	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
Parks and Trails					
EC-27	Pedestrian and bicycle traffic on the Bob Callan Trail will be maintained by means of an approved traffic control plan during construction of proposed bridges. Conditions to be provided in the Transportation Management Plan (TMP). Precautions will be taken to ensure the safety of the trail users during construction. The trail facility will not be used for construction staging. Construction of the managed lanes over Bob Callan Trail will be of limited duration. Construction of the proposed bridge widening will occur at night when the trail is closed. The trail will remain open during the day during normal operating hours. No change in ownership will take place to any parkland. Any impact to the Bob Callan Trail due to P3 Developer construction activities will be mitigated by restoring the Trail to pre-construction conditions.	A copy of the concurrence from Cobb County regarding temporary impacts to Bob Callan Trail is located in the Appendix (pages 11-12).	P3 Developer with GDOT oversight	During construction of the bridge widening over Bob Callan Trail.	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
EC-35	No equipment and materials lay down and staging areas will be located within 500 yards of Olde Rope Mill Park.	GDOT will monitor the site for compliance during construction.	P3 Developer	During construction.	GDOT Office of Innovative Program Delivery
Historic and Archaeological Resources					
EC-19	Eligible historic boundary for the Marietta and North Georgia Railroad (i.e., the right-of-way of the railroad mainline) and the Dobson Gulf Service Station - Marietta Muffler will be included on all plans. No construction will occur within the historic boundaries.	GDOT will monitor the sites for compliance during construction (see Appendix page 15).	GDOT for Right of Way Plans; P3 Developer for construction plans and during construction	Included on plans before plan approval. Construction boundaries maintained during construction.	GDOT Office of Innovative Program Delivery
Traffic Noise					
EC-9	A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers. Public involvement will be conducted in accordance with the approved public involvement plan for the project.	Sound barriers have been found to meet GDOT feasibility and reasonableness requirements in 28 locations along I-75 and 9 locations along I-575, see attached figures (Appendix pages 19-21). Affected property owners and dwellers will be asked to complete and submit a ballot voting form for proposed sound barriers in their neighborhood. Sound barriers would only be constructed if, at a minimum, 50 percent plus one of the respondents vote in favor of the sound barrier.	P3 Developer with oversight by GDOT	Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers. Public meetings are expected to occur during the last quarter of 2013 or first quarter of 2014.	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
EC-11	The height of both structural walls and sound barriers will be mitigated visually through the use of context-sensitive aesthetic finishes or treatments and, where possible, landscaping. Community outreach to this end will be implemented during final design.	Aesthetic treatment requirements are specified in the RFP. Aesthetic treatments will be evaluated in the best value scoring of the P3 Developers.	The selected P3 Developer with oversight by GDOT will prepare a design palette and conduct public meetings during final design.	Coordination with adjacent property owners regarding the finish / appearance of potential sound barriers will be conducted in conjunction with to the final decision on the installation of the sound barriers. Public meetings are expected to occur prior to construction.	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	***Commitment / Requirement***	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
Threatened/Endangered Species					
EC-3	Include Special Provision (SP) 107.23G for the protection of migratory bird species and the protection of the federally endangered Indiana bat (*Myotis sodalis*), gray bat (*Myotis grisescens*), the federally threatened Cherokee darter (*Etheostoma scotti*), the state-listed Chattahoochee crayfish (*Cambrus howardii*), highscale shiner (*Notropis hypsilepis*), bluestripe shiner (*Cyprinella callitaenia*), delicate spike (*Elliptio arctata*), and lined chub (*Hybopsis lineapunctata*) in the P3 Developer Agreement.	P3 Developer will be responsible for complying with the Endangered Species Act (ESA) and the Fish and Wildlife Coordination Act (FWCA). The P3 Developer will provide specific protective measures. GDOT will be responsible for documentation of ESA and FWCA requirements.	GDOT will include a special provision (see Appendix pages 25-29) with specific requirements in the RFP; P3 Developer will implement the requirements with oversight by GDOT and Georgia Department of Natural Resources (DNR).	The P3 Developer Agreement will be executed before design and construction.	GDOT Office of Innovative Program Delivery
EC-49	The US Fish and Wildlife Service (USFWS) will be provided with the stormwater control and infiltration plan prior to finalization of the construction plans.		P3 Developer will be responsible for providing GDOT with the stormwater control and infiltration plan prior to finalization of the construction plans. GDOT will be responsible for submitting the plan to USFWS prior to finalization of the construction plans.	Prior to finalization of construction plans.	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	***Commitment / Requirement***	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
Migratory Birds					
EC-26	Special Provision (SP) 107.23G for the protection of migratory bird species and the protection of the federally endangered Indiana bat (*Myotis sodalis*), gray bat (*Myotis grisescens*), the federally threatened Cherokee darter (*Etheostoma scotti*), the state-listed Chattahoochee crayfish (*Cambrus howardii*), highscale shiner (*Notropis hypsilepis*), bluestripe shiner (*Cyprinella callitaenia*), delicate spike (*Elliptio arctata*), and lined chub (*Hybopsis lineapunctata*) will be implemented.		GDOT will include a special provision (see Appendix pages 25-29) with specific requirements in the RFP; P3 Developer with oversight by GDOT	Prior to beginning of construction. Field survey can be conducted any time of year; however, exclusionary netting can only be installed before April 1 or after August 31.	GDOT Office of Environmental Services
Streams and Wetlands					
EC-1	All Waters of the U.S., state waters, and stream/pond buffers will be shown on the plans and appropriately labeled.	Water Resources graphics from the January 2013 Addendum to the June 2010 Ecology Technical Report prepared for the FEIS Reevaluation attached to this document.	P3 Developer with oversight by GDOT	To be delineated on plans prior to plan approval.	GDOT Office of Innovative Program Delivery
EC-2	Specific buffer variances will be obtained for Streams 4, 8, and 16 prior to project implementation.	Water Resources graphics from the January 2013 Addendum to the June 2010 Ecology Technical Report prepared for the FEIS Reevaluation attached to this document.	GDOT	Prior to construction.	GDOT Office of Environmental Services

EC-4	Mitigation for the unavoidable 3,309 linear feet of permanent stream impacts (a total of 9,573.75 stream mitigation credits) will be provided by using an USACE-approved commercial mitigation bank or GDOT-owned bank serving HUC 03130001 and HUC 03150104.	GDOT will obtain based on the P3 Developer's approved construction plans.(Refer to Appendix pages 34-49)	GDOT	Prior to construction.	GDOT Office of Environmental Services
EC-25	Placement of advance toll signage will avoid any waters of the U.S.	Waters of the US will be delineated on the plans. GDOT will monitor the site for compliance during construction. (Refer to Appendix pages 51-66) Advance Toll Signage graphics from the RFP are attached to this document.	P3 Developer design with GDOT review and oversight	Before construction.	GDOT Office of Innovative Program Delivery
EC-46	Construction and installation activities for the advance toll signage shall avoid impacts to waters of the U.S.	GDOT will monitor the site for compliance during construction. (Refer to Appendix pages 51-66)	P3 Developer with GDOT review and oversight	During construction.	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
Floodplains					
EC-7	Coordination with FEMA, Cobb and Cherokee Counties, and GDNR will be conducted regarding the impacts to regulatory floodways. Hope Creek, Rottenwood Creek, Sope Creek and Elizabeth Branch will require a FEMA no-rise certification. Prior to construction, an approved FEMA CLOMR will be required for Hope Creek and Rottenwood Creek. Issuance of a LOMR by FEMA will be required after construction is complete. The P3 Developer will prepare the final hydraulic analysis using the most current hydraulic information available.	Floodplains graphic excerpted from the Environmental Constraints Maps (Appendix I in Volume 2 of the FEIS) is attached to this document in the Appendix on page 69.	P3 Developer with oversight by GDOT	Hydraulic analysis – during final design. No-rise certification – during final design. CLOMR - prior to start of construction. LOMR - post construction.	GDOT Office of Innovative Program Delivery
EC-8	The P3 Developer shall design the project to minimize impacts to floodplains. These features should include bridge structures over streams, increasing the slope ratio at the 100-year floodplain crossings, and placing retaining walls at the 100-year floodplain crossings.	GDOT will specify design requirements in the RFP	P3 Developer will design; GDOT will review.	Prior to plan approval	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
Hazardous Materials					
EC-20	A Level II contamination assessment will be conducted at all sites where right-of-way is required.	HazMat Level II graphics excerpted from the Contamination Screening Technical Report of the FEIS is attached to this document (Appendix, pages 73-77).	GDOT	Prior to right of way acquisition from these parcels.	GDOT Right of Way Office GDOT Office of Materials and Research
EC-48	A limited due diligence transaction screening investigation (American Society for Testing and Materials [ASTM] E1528) will be conducted for all properties immediately prior to purchase.	HazMat Level II graphics excerpted from the Contamination Screening Technical Report of the FEIS is attached to this document. (Appendix, pages 73-77)	GDOT	Prior to right of way acquisition.	GDOT Right of Way Office GDOT Office of Materials and Research
Construction Impacts					
EC-18	A mitigation plan for the extended duration of potential 24-hour effects from construction-related noise, light, glare, and dust will be developed. The plan will be coordinated with neighborhood groups, including residents living in close proximity to the project corridor construction zone and staging areas.	This will be included in the P3 Developer's Environmental Compliance and Mitigation Plan. GDOT will specify the requirements of the ECMP in the RFP	P3 Developer with oversight by GDOT.	During design / prior to construction. The ECMP is to be submitted to GDOT 120 days after beginning design. Meetings with neighborhood groups will be held no less than 30 days prior to beginning work in each area.	GDOT Office of Innovative Program Delivery
EC-37	A mitigation plan for the extended duration of potential 24-hour effects from construction-related noise, light, glare, and dust will be implemented.	GDOT will monitor the site for compliance during construction.	P3 Developer with oversight by GDOT.	During construction.	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	***Commitment / Requirement***	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
EC-17	A detailed construction noise mitigation plan will be developed prior to the initiation of construction.	Compliance with all state and local sound control and noise level rules, regulations and ordinances is mandatory. The plan will be coordinated with neighborhood groups, including residents living in close proximity to the project construction zone and staging areas. The plan will be reviewed and approved by GDOT.	P3 Developer with oversight by GDOT.	Plan will be developed and approved prior to the start of project construction.	GDOT Office of Innovative Program Delivery
EC-36	The P3 Developer shall comply with all state and local sound control and noise level rules, regulations, and ordinances.	GDOT will monitor the site for compliance during construction.	P3 Developer with oversight by GDOT.	During construction.	GDOT Office of Innovative Program Delivery

Impact Area / Commitment Number	***Commitment / Requirement***	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
EC-37	The following noise abatement measures will be implemented during construction: • Keep the public informed when work is going to be done; • Keep a telephone log of complaints and how they were resolved • Limit the number and duration of onsite idling equipment; • Maintain all construction equipment in good repair; • Reduce noise from all stationary equipment and facilities by using suitable enclosures; • Schedule truck loading, unloading and handling operations to minimize construction site noise.	GDOT will monitor the site for compliance during construction. GDOT will review the telephone log of complaints and how they were resolved on a monthly basis. A project hotline number will be provided and a field office or mobile trailer will be opened within Cobb County so that any and all members of the public can directly report problems related to construction activities.	P3 Developer with oversight by GDOT	During construction.	Project website Project hotline number Project field office GDOT Communications

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
EC-31	Variances, special permits, or approval may be required if construction occurs during nighttime hours and/or on Sundays. Any necessary variances to noise ordinances will be obtained prior to construction.	Variances, special permits or approval will be obtained when necessary. Within the City of Marietta, the City Engineer may grant permission for the work to be done outside of normal hours (7 a.m. to 7 p.m. Monday through Saturday). Within unincorporated Cherokee County, the Board of Commissioners may grant permission for work to be done outside of normal hours (7 a.m. to midnight Monday through Saturday and 1 p.m. to 6:30 p.m. Sunday). Within unincorporated Cobb County normal hours are 7 a.m. to 9 p.m. Monday through Saturday.	P3 Developer with oversight by GDOT.	Prior to start of construction, when necessary.	GDOT's Office of Innovative Program Delivery
EC-38	The following standard preventive BMP measures will be implemented during construction to minimize the amount of construction dust generated: • Minimize land disturbance; • Use watering trucks to minimize dust; • Cover trucks when hauling dirt; • Stabilize surface of dirt piles if not removed immediately; • Limit vehicular paths and stabilize these temporary roads.	GDOT will monitor the site for compliance during construction.	P3 Developer with oversight by GDOT.	During construction.	GDOT's Office of Innovative Program Delivery

Impact Area / Commitment Number	***Commitment / Requirement***	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
EC-39	The following BMP measures will be implemented to the extent practicable to minimize greenhouse gas emissions during construction: • Reduce equipment idle time; • Reduce fuel usage through increased fuel efficiency; • Use alternative fuels; • Properly maintain equipment; • Provide driver training to improve operating efficiency; • Use properly sized equipment; • Replace older, less fuel efficient equipment with newer, more efficient equipment; • Reuse/recycle waste construction materials.	GDOT will coordinate with P3 Developer to determine which measures are practicable throughout the construction of the project.	P3 Developer with oversight by GDOT.	During construction.	GDOT's Office of Innovative Program Delivery
EC-40	The following BMP measures will be implemented during construction in order to minimize worker exposure to diesel exhaust: • Position exhaust pipes so that diesel fumes are directed away from the operator and nearby workers; • Routine inspection and maintenance of filtration devices.	GDOT will monitor the site for compliance during construction.	P3 Developer with oversight by GDOT.	During construction.	GDOT's Office of Innovative Program Delivery

Impact Area / Commitment Number	***Commitment / Requirement***	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
EC-41	The following measures will be implemented to the extent practicable to minimize worker exposure to diesel exhaust during construction: • Use low-sulphur diesel fuel; • Retrofit engines with exhaust filtration devices to capture diesel particulate matter; • New equipment should be equipped with the most advanced emission control system available.	GDOT will coordinate with P3 Developer to determine which measures are practicable throughout the construction of the project.	P3 Developer with oversight by GDOT	During construction.	GDOT's Office of Innovative Program Delivery
EC-44	A project hotline number will be provided and a field office or mobile trailer will be opened so that any and all members of the public can directly report problems related to construction activities, and ensure problems will be resolved promptly.	A project-specific toll-free telephone number will be established by GDOT. The attached voice mail system will allow callers to hear their options in either English (press 1) or Spanish (press 2) similar to SRTA's Peach Pass telephone number (1-855-PCH-PASS). For this project the options will also be provided in Portuguese (press 3). GDOT will review the telephone log of complaints and how they were resolved on a monthly basis.	GDOT will maintain the hotline; GDOT and P3 Developer will staff the field office.	Hotline and field office will be established prior to start of construction. Both will be implemented throughout project construction.	Project website Project hotline number Project field office GDOT Communications

Impact Area / Commitment Number	***Commitment / Requirement***	***Notes***	***Party Responsible for Implementing Mitigation***	***Timeframe***	***For More Information***
EC-22	Prior to construction, the National Oceanic and Atmospheric Administration (NOAA) shall be provided no less than a 90-day notification of planned activities that will disturb or destroy any geodetic control monuments. This will provide time to plan for and execute relocation of geodetic monuments.	Developer shall compare construction limits to locations of geodetic monuments available at www.ngs.noaa.gov. Monuments DG3862, DG3864 and DG2831 may be within project limits.	P3 Developer with oversight by GDOT.	During design – no less than 90 days prior to construction.	GDOT's Office of Innovative Program Delivery
EC-24	Meetings will be conducted with the public regarding potential detours. The meetings will be conducted in accordance with GDOT public involvement procedures.	Detour public hearings will be held.	P3 Developer with oversight by GDOT.	During design	GDOT's Office of Innovative Program Delivery
EC-32	Construction activities will be scheduled so that property access and utility disruptions are anticipated, scheduled in advance, and are as brief as possible. Advance notification for such disruptions will be provided to affected property owners and businesses.	Developer will knock on doors to speak in person to those affected. Door hangers will be left if no answer. Anticipated disruptions will be posted to the project website.	P3 Developer with oversight by GDOT.	Advance notice will be provided a minimum of 14 days prior to planned disruption.	GDOT's Office of Innovative Program Delivery
EC-33	Deliveries of construction materials will be scheduled to minimize disruptions to surrounding land uses	Deliveries of construction materials will be scheduled to minimize impacts to businesses, schools, places of worship and residences. Where possible, this means that deliveries would occur during the day in residential areas and when businesses, schools, etc are closed or during off peak hours of operation.	P3 Developer with oversight by GDOT.	During construction.	GDOT's Office of Innovative Program Delivery

Impact Area / Commitment Number	*Commitment / Requirement*	*Notes*	*Party Responsible for Implementing Mitigation*	*Timeframe*	*For More Information*
EC-42	Where possible, lane closures will be limited to nighttime periods or on weekends.	As described in Volume 2, Section 18 of the RFP, lane closures will not be allowed on the interstates Monday - Friday 5 a.m. to 9 p.m., Saturday 7 a.m. to 9 p.m., Sunday 9 a.m. to 9 p.m.	P3 Developer with oversight by GDOT.	A Transportation Management Plan (TMP) will be prepared during design and implemented during construction.	GDOT's Office of Innovative Program Delivery
EC-43	Where possible, construction on the cross streets and highway ramps will take place during off-peak periods.	As described in Volume 2, Section 18 of the RFP, lane closures will not be allowed on cross streets and ramps Monday – Sunday 5:30 a.m. to 9:30 a.m. and 4 p.m. to 7 p.m.	P3 Developer with oversight by GDOT.	A Transportation Management Plan (TMP) will be prepared during design and implemented during construction.	GDOT's Office of Innovative Program Delivery

Permits						
Permit	***Legislation***	***Responsible Regulatory Agency***	***Purpose***	***Party Responsible for Implementing***	***Timeframe***	***Green Sheet Reference***
Section 404 Individual Permit	Clean Water Act (CWA)	USACE	Regulation of the discharge of dredged, excavated or fill material in wetlands, streams, rivers and other US waters.	Permit is issued to GDOT by USACE.	Prior to start of construction.	EC-5
National Pollutant Discharge Elimination System (NPDES) Permit	CWA	Georgia Department of Natural Resources Environmental Protection Division (EPD)	Controls water pollution by regulating point sources that discharge pollutants into Waters of the US. Point sources include pipes or man-made ditches.	GDOT to lead coordination with EPD. P3 Developer will prepare permit application.	Prior to start of construction.	EC-6

APPENDIX

ENVIRONMENTAL JUSTICE

EC-13, EC-50

STATE ROAD & TOLLWAY AUTHORITY
STATE OF GEORGIA

Nathan Deal, Governor
Chairman

Gena L. Evans, Ph.D.
Executive Director

February 26, 2013

SRTA Cash-Based/Cash-Preferred Customer Solutions Overview

In order to provide choices and flexibility to current as well as potential Peach Pass customers, SRTA is developing several strategies to allow cash-based or cash-preferred customers multiple payment methods so that they can utilize the state's toll facilities. These payment "channels" include in person Customer Service centers and retail based payment options.

SRTA WALK UP CUSTOMER SERVICE CENTERS

SRTA currently operates 3 walk up Customer Service Centers where current as well as new customers can transact business in person with SRTA. These locations support new account sign up, account closings, account payments and violation payments. Each location is set up to process payments made via cash, check or credit card. Customers will have the choice to open pre-paid Peach Pass accounts via credit card or cash. Either payment method is subject to the same charges and fee schedules. In addition, to the payment related transactions identified above, Peach Pass customers can request and receive Peach Pass transponders, as well as update vehicle and account information at these locations.

SRTA's primary Customer Service Center is located at SRTA's headquarters in downtown Atlanta. This location is considered our permanent location and offers all of the services noted above, plus access to SRTA management.

The other two Customer Service Centers are co-located at Georgia Department of Driver Services (DDS) Service Centers along the I-85 corridor. These two locations provide easy access to motorists who live near and/or frequently travel the I-85 Express Lanes. SRTA opened both locations in advance of the opening of the I-85 Express Lanes in order to facilitate account set up and transponder penetration, and general motorist education of the I-85 Express Lanes.

SRTA intends to duplicate this model by partnering with DDS to co-locate Peach Pass Customer Service Centers at other DDS locations located in the vicinity of future planned toll facilities; including both the planned I-75 NWC managed lanes and the planned I-75 South Express Lanes toll facilities. In addition, SRTA's marketing plans include opening additional locations near the physical location of upcoming toll facilities. This allows SRTA to have a presence that is physically convenient to motorists most likely to use the new facility. As part of each project, SRTA will open Customer Service Centers in advance of the respective toll facilities opening to traffic.

The current Customer Service Centers are located at:

- State Road and Tollway Authority, 47 Trinity Ave. SW, Ground Floor, Atlanta, GA 30334
- Department of Driver Services, 2211 Beaver Ruin Road, Norcross, GA 30071
- Department of Driver Services, 310 Hurricane Shoals Road, NE, Lawrenceville, GA 30046

"PAY N GO" PEACH PASS ACCOUNT OPTION

In order to provide additional options for cash-based or cash-preferred customers to access all electronic toll facilities, the State Road and Tollway Authority (SRTA) is working with its back office provider, Electronic Transaction Consultants Corporation (ETCC) and third party network provider, InComm, to provide a cash-based payment solution that is available to all current or potential Peach Pass customers at retail locations that they commonly visit throughout the week.

InComm is an industry leading marketer, distributor and technology innovator of stored-value gift cards and prepaid products. InComm's retail network features most of the premier brands in the big box, grocery, convenience, chain drug, discount, electronics, office supply and other categories. Through an electronic interface, InComm's network will communicate receipt of prepaid toll funds that will be associated with a toll transponder and available for use on any Georgia toll facilities. As currently envisioned, SRTA is working with ETCC and InComm to offer the following 2 products within the next 6 – 12 months. Both products will be marketed under the brand, "Pay N Go Peach Pass" Accounts:

The first is a package containing a Peach Pass transponder and an InComm reloadable card. This package is referred to as a Pay N Go Peach Pass Starter Kit. The card inside the kit will be associated to the transponder in InComm's database. SRTA will be responsible for furnishing the transponder and InComm will produce the card. InComm will package the card and transponder together and provide logistics to get the cards onto the existing gift card displays at merchants in the appropriate areas throughout Metro-Atlanta (or whichever geographic location within Georgia that is in proximity to a state toll facility). The transponder/card package will be sold for a suggested $2.50, plus the pre-paid toll value added to the account at the time of purchase. Currently we contemplate a suggested minimum value of $20, which corresponds with the minimum prepaid amount on credit card based pre-paid accounts and a maximum of $500. The retail merchant and InComm would be compensated through the $2.50 fee.

The entire financial transaction occurs in real time in the same manner as any other point of sale purchase. By the time the consumer exits the store, the value is associated with the transponder. The consumer simply attaches the transponder to their vehicle and they can immediately access the I-85 Express Lanes, the GA 400 Open Road Tolling lanes, as well as any other toll facility (e.g. the planned I-75 Northwest Corridor Express Lanes and the planned 75 South Express lanes). The packaging instructions will include information on how to add value to their account through retail merchants located through the consumer's live/work communities, as well as information on automated online payments via debit or credit cards for reloading. This allows a cash-based customer to access the system very easily and remain anonymous if desired. This puts the transponder distribution and payment process in the communities of all potential users, at the merchants where they shop weekly. This also allows easy transponder distribution to the credit card-based customer by reminding them while they shop.

The second product would be a reload or "top-up" card only. This card would hang next to the Starter Kit package described above, and will be marketed as "good for top-up of existing accounts." After picking up the card and proceeding to the register, the customer is asked, "how much do you

want to add to the card", with a minimum of $20 and maximum of $500. A $1.50 transaction fee will be added to the transaction. The consumer then leaves the store, calls a toll-free number and goes into InComm's Interactive Voice Response (IVR) system. The consumer provides the card number and their transponder number. The IVR platform, is linked to InComm's database which in turn is linked to the merchant's Point of Sale (POS) system will determine the value of the card that was paid at the register and will send ETCC a message with the information. ETCC will then add the value to the appropriate Peach Pass account and respond with the new balance, which will be provided to the consumer via the IVR system. Once the customer has associated the "top-up" card with their account (by linking it to one of the transponders on their account) the balance is immediately available on their account. If the customer has difficulty, a live operator will assist 24/7/365 in English and Spanish. The data capture may also be completed on a web site or via a mobile application. The customer only has to provide the transponder data once. InComm will associate the data with the card, and subsequent "top-up" transactions with the same card will automatically push the value to ETCC from the merchant location's POS system in real-time with no additional data capture needed. Subsequent top-ups will also incur the $1.50 fee.

The products outlined here will leverage the latest payment and replenishment mechanisms that are familiar to those customers who may already use similar process used for phone calling cards and gift cards.

Retail merchant locations such as Wal-Mart, Walgreen's, Target and Best Buy are a few of the retail merchants within InComm's network. We will be working with InComm to identify specific locations at the appropriate time. We believe that the steps outlined here, will allow the same ease of access as provided to those patrons who have credit card-backed accounts. In fact, it should be noted that these products can be used by cash-based or credit card-based customers for the same fee structure. The fees charged are sized to nominally compensate InComm and the retail merchants for their operation and maintenance of the broad distribution network. This ease of access, coupled with the simplicity of the approach, is the cornerstone to providing a convenient solution for payment of tolls by cash-based customers.

CONCLUSION

SRTA's current business model distributes Peach Pass sticker transponders free to all users (credit card and cash-based). The solutions outlined in this paper increase those distribution channels as a convenience to current and potential customers. There is no charge to reload customer accounts if the account is backed by a credit card. There is no charge to reload customer accounts in person at customer service walk-up facilities (operated by SRTA) for the cash user. SRTA is constantly evaluating its business practices (including account establishment and reload) to best serve their customers. The InComm solution with prepaid cards is currently envisioned as a convenient option for the cash-based user. As we develop and market the InComm solution we will continue to refine its terms. The pricing that is currently in place is anticipated to stay at its current levels indefinitely but will be re-evaluated at the time of renewal of the contract.

PARKS AND TRAILS

EC-27

Vance C. Smith, Jr., Commissioner

GEORGIA DEPARTMENT OF TRANSPORTATION

One Georgia Center, 600 West Peachtree Street, NW
Atlanta, Georgia 30308
Telephone: (404) 631-1000

August 26, 2010

Mr. Daniel R. McDuff
Deputy Director / Chief Engineer
Cobb County Department of Transportation
1890 County Services Parkway
Marietta, Georgia 30008

Re: Project CSNHS-0008-00(256), Cherokee and Cobb Counties,
P. I. No. 0008256
Bob Callan Trail

Dear Mr. McDuff:

The Georgia Department of Transportation (GDOT) is continuing with the development of the above noted project. The Draft Environmental Impact Statement (DEIS) was completed in April 2007. Based on comments received, as well as the current funding realities, GDOT decided to develop a reduced alternative. We are preparing a Supplemental Draft Environmental Impact Statement (SDEIS) presenting this revised alternative and will provide a copy for you and others in Cobb County once the SDEIS is approved.

The purpose of this letter is to coordinate construction activities in the vicinity of the Bob Callan Trail (Trail) and to request your concurrence that the Northwest Corridor Project will not have an adverse effect to this Cobb County trail. The Trail, formerly a portion of the Rottenwood Creek Trail, is located in the southeast quadrant of the I-75/I-285 interchange on GDOT Right of Way. The Trail originates in the Chattahoochee River National Recreation Area, West Palisades Unit and extends north on the east side of I-75, crosses the Interstate North Parkway and connects to the programmed Interstate North Parkway Trail. The Trail is approximately 2.1 miles in length.

A Summary of Project Impacts

As proposed, the southbound I-75 managed lane ramp to the I-285 eastbound general purpose lane and the westbound I-285 ramp to the northbound I-75 managed lanes will pass over the Bob Callan Trail located in GDOT right-of-way. There will be no change in right-of-way ownership. No direct impacts are expected to occur to the Trail as a result of the Northwest Corridor Project. It is anticipated that construction in the area of the trail will result in periodic pacing of traffic during construction for safety reasons due to the Trail's proximity to the proposed work on the managed lane system. Pedestrian traffic will be maintained. Coordination will occur with the official with jurisdiction over the Trail prior to any work. No changes to the trail itself are anticipated; as such, no permanent adverse physical impacts will occur. No construction staging will occur on the Trail. Should there be any physical impacts to the trail, the affected land would be fully restored, i.e., returned to a condition which is at least as good as that which existed prior to the project.

Concurrence with the No Adverse Effects Determination

As the official with jurisdiction over the Bob Callan Trail, I concur that

- **any periodic trail traffic pacing would be temporary in duration;**
- **no changes to the trail would occur—any traffic pacing would be to assure the safety of trail users;**
- **no permanent adverse physical impact to the Trail would occur; and**
- **any physical impact to the Trail would be addressed so that the Trail would be returned to a condition which is at least as good as that which existed prior to the project.**

In addition, I understand that my concurrence serves to document the traffic management plan for the Bob Callan Trail is being considered by FHWA as an exception to the requirements of Section 4(f) per the conditions set forth in 23 CFR 774.13(d).

Signature: _____ **Date:** 26 AUGUST 2010

After signing and dating this letter, we ask that you return a copy of this letter to the attention of Keisha Jackson at the Georgia Department of Transportation, 600 West Peachtree Street, NW, Atlanta, GA 30308. We appreciate your assistance in making this transportation project possible.

If you have any questions or concerns, please feel free to contact John Hancock, the project manager at (404)631-1711 or via email at jhancock@dot.ga.gov or Keisha Jackson, the project environmental specialist at (404)631-1160 or via email at keijackson@dot.ga.gov.

Sincerely,

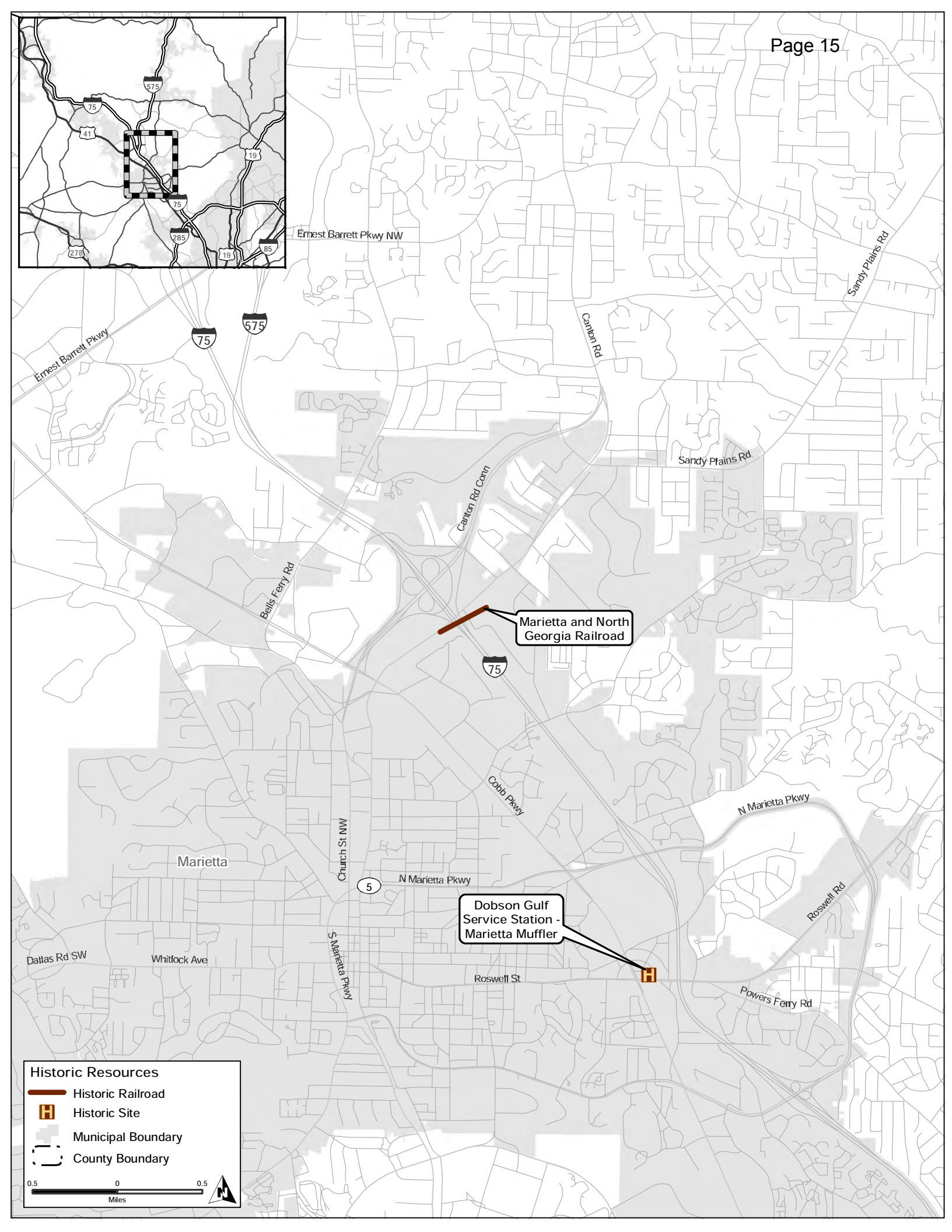
Glenn Bowman, P.E.

Glenn Bowman, P.E.
State Environmental Administrator

GB/gb/kj

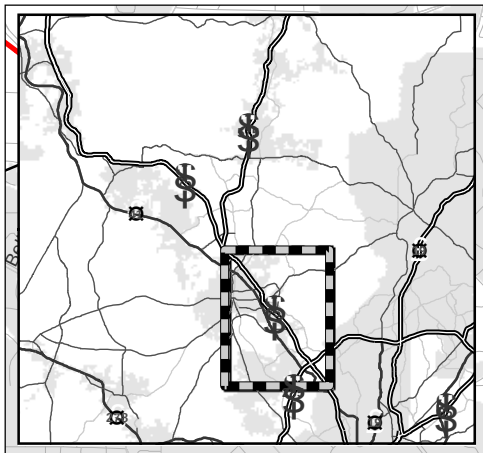
HISTORIC AND ARCHAEOLOGICAL RESOURCES

EC-19


Ernest Barrett Pkwy NW
Ernest Barrett Pkwy
Canton Rd
Sandy Plains Rd
Canton Rd Conn
Bells Ferry Rd
Marietta and North Georgia Railroad
Cobb Pkwy
N Marietta Pkwy
Church St NW
Marietta
S Marietta Pkwy
Roswell Rd
Dobson Gulf Service Station - Marietta Muffler
Dallas Rd SW
Whitlock Ave
Roswell St
Powers Ferry Rd
Historic Resources
Historic Railroad
Historic Site
Municipal Boundary
County Boundary
0.5 0 0.5
Miles

TRAFFIC NOISE

EC-9, EC-11



SOUND BARRIER 33

SOUND BARRIER 14 - 15

SOUND BARRIER 18

SOUND BARRIER 19

SOUND BARRIER 20

SOUND BARRIER 21

SOUND BARRIER 22

SOUND BARRIER 23

SOUND BARRIER 24

SOUND BARRIER 25

SOUND BARRIER 26

SOUND BARRIER 27

SOUND BARRIER 28

SOUND BARRIER 29

SOUND BARRIER 30

SOUND BARRIER 31

SOUND BARRIER 32

SOUND BARRIER 34

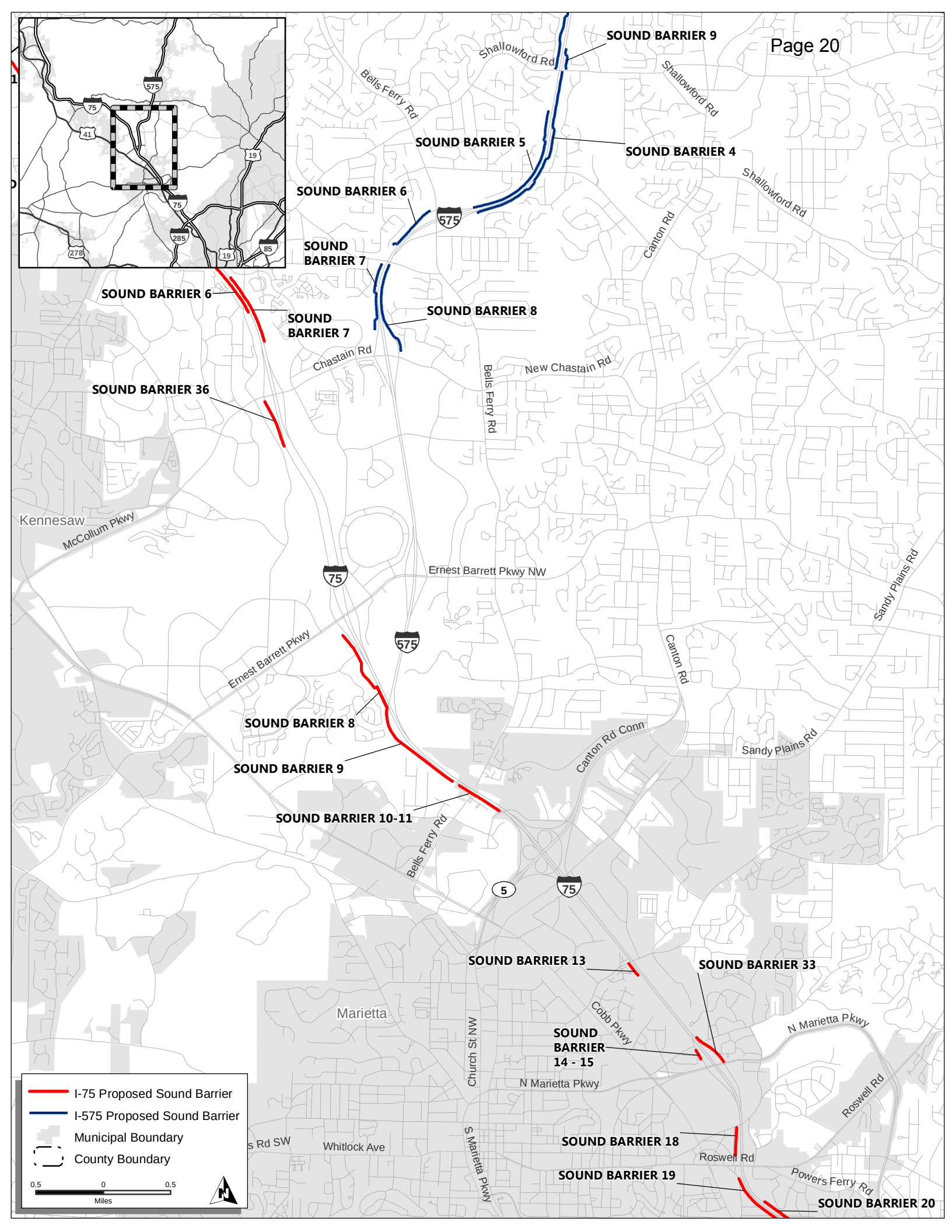
SOUND BARRIER 35

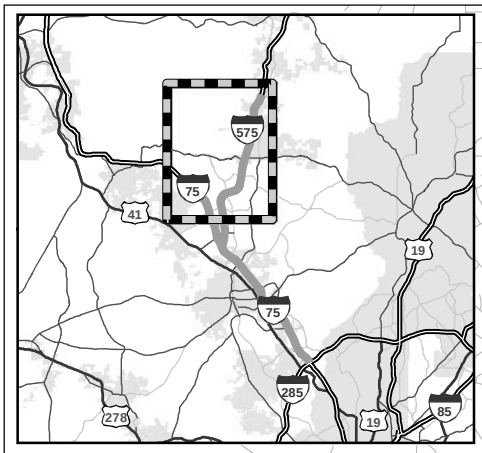
SOUND BARRIER 38

Sandy Plains Rd
Roswell Rd
Cobb Pkwy
N Marietta Pkwy
Church St NW
Marietta
S Marietta Pkwy
Atlanta St SE
Powder Springs St
Powers Ferry Rd
Delk Rd
Austell Rd
Atlanta Rd SE
S Cobb Dr
Roswell St
Smyrna
Windy Hill Rd
Windy Ridge Pky SE
Sandy Springs
Atlanta

I-75 Proposed Sound Barrier
Municipal Boundary
County Boundary

0.5 0 0.5
Miles


SOUND BARRIER 9
Shallowford Rd
Bells Ferry Rd
Shallowford Rd
SOUND BARRIER 5
SOUND BARRIER 4
SOUND BARRIER 6
575
Shallowford Rd
Canton Rd
SOUND BARRIER 7
SOUND BARRIER 6
SOUND BARRIER 8
SOUND BARRIER 7
Chastain Rd
New Chastain Rd
Bells Ferry Rd
SOUND BARRIER 36
Kennesaw
McCollum Pkwy
75
Ernest Barrett Pkwy NW
575
Sandy Plains Rd
Ernest Barrett Pkwy
Canton Rd
SOUND BARRIER 8
SOUND BARRIER 9
Canton Rd Conn
Sandy Plains Rd
SOUND BARRIER 10-11
Bells Ferry Rd
5
75
SOUND BARRIER 13
SOUND BARRIER 33
Marietta
Cobb Pkwy
N Marietta Pkwy
SOUND BARRIER 14 - 15
Church St NW
N Marietta Pkwy
Roswell Rd
SOUND BARRIER 18
Whitlock Ave
S Marietta Pkwy
Roswell Rd
SOUND BARRIER 19
Powers Ferry Rd
SOUND BARRIER 20
I-75 Proposed Sound Barrier
I-575 Proposed Sound Barrier
Municipal Boundary
County Boundary
0.5 0 0.5
Miles
N



Holly Springs
Sixes Rd
Canton Hwy
PROPOSED BARRIER BY OTHERS
PROPOSED BARRIER BY OTHERS
575
Towne Lake Pkwy
Cherokee County
Woodstock
SOUND BARRIER 1
Dupree Rd
SOUND BARRIER 2
Alabama Rd
92
Alabama Rd
Bells Ferry Rd
Main St
92
SOUND BARRIER 3
75
SOUND BARRIER 2
SOUND BARRIER 9
Shallowford Rd
SOUND BARRIER 1
Hickory Grove Rd
Wade Green Rd
Bells Ferry Rd
Shallowford Rd
SOUND BARRIER 4
SOUND BARRIER 5
SOUND BARRIER 4
SOUND BARRIER 3
SOUND BARRIER 6
Shallowford Rd
SOUND BARRIER 5
Cobb County
Canton Rd
SOUND BARRIER 7
SOUND BARRIER 6
SOUND BARRIER 7
SOUND BARRIER 8
Kennesaw
Chastain Rd
New Chastain R
Bells Ferry Rd
75
575
SOUND BARRIER 36

I-75 Proposed Sound Barrier
I-575 Proposed Sound Barrier
Municipal Boundary
County Boundary
0.5 0 0.5
Miles
N

THREATENED/ENDANGERED SPECIES

EC-3, EC-26

MIGRATORY BIRDS

EC-3, EC-26

Date: December 20, 2012

DEPARTMENT OF TRANSPORTATION

STATE OF GEORGIA

SPECIAL PROVISION

PROJECT: CSNHS-0008-00(256) COBB and CHEROKEE COUNTIES, PI # 0008256

Section 107 – Legal Regulations and Responsibility to the Public

---

Add the following to Subsection 107.23:

G. Protection of Environmentally Sensitive Species

The following conditions are intended as a minimum to protect migratory bird species, the listed federally protected species, and the listed state-protected aquatic species, as well as their habitat during any activities that are in close proximity to the known location(s) of these species. The following paragraphs detail the specific and general special provisions that will be in place for migratory bird species, federally protected species, and the listed state-protected aquatic species as well as the incident reporting requirements.

1. The Contractor shall advise all project personnel employed to work on this project about the potential presence and appearance of federally protected eastern phoebes (*Sayornis phoebe*), cliff swallows (*Petrochelidon pyrrhonota*) or barn swallows (*Hirundo rustica*), and that there are civil and criminal penalties for harming, harassing, or killing these species, which are protected under the Migratory Bird Treaty Act of 1918. The Contractor shall advise all project personnel employed to work on this project about the potential presence and appearance of the federally endangered Indiana bat (*Myotis sodalis*), gray bat (*Myotis grisescens*), and the federally threatened Cherokee darter (*Etheostoma scotti*), which are protected under the Endangered Species Act of 1973 and the Georgia Endangered Wildlife Act of 1973, and that there are civil penalties for capture, killing or selling the Indiana bat, gray bat, and Cherokee darter. Furthermore, the Contractor shall advise all project personnel employed to work on this project about the potential presence and appearance of the state-listed Chattahoochee crayfish (*Cambrus howardii*), highscale shiner (*Notropis hypsilepis*), bluestripe shiner (*Cyprinella callitaenia*), delicate spike (*Elliptio arctata*), and lined chub (*Hybopsis lineapunctata*) and that there are civil and criminal penalties for harming, harassing, or killing these species, which are protected under the Georgia Endangered Wildlife Act of 1973. Pictures and habitat information will be provided to the Contractor at the preconstruction conference.

Migratory Bird Specific Special Provisions

2. Prior to the beginning of work on the existing bridge structures and culverts structures (equal to or larger than 5 feet x 5 feet) along the proposed project, each bridge and culvert will be inspected to determine if active bird nesting activity and/or roosting birds or bats are present within the bridges and culverts. If it is determined that exclusionary devices in the form of netting made of plastic, canvas, or other materials are necessary, the following requirements must be met in order for exclusionary netting to be considered appropriate:

    a. The project ecologist must be notified by phone (404) 631-1100 of the decision to install exclusionary devices under the existing bridges and/or culverts and the date of installation, prior to the installation of any exclusionary devices.

    b. Prior to the placement of exclusionary netting, the bridges and culverts must be checked to ensure that eggs or birds are not present in the nests nor bats roosting. If the nests are found to be occupied and/or there are roosting bats, all construction activities associated with the bridge or culvert must be postponed until August 31st when the breeding season is complete. If nests are not found or existing nests are unoccupied and/or there are no roosting bats, the installation of exclusionary devices is permissible.

    c. The exclusionary netting must prevent birds/bats from accessing nesting habitat along the full length of the bridge or culvert until the commencement of work (i.e., removal, replacement, or extension) at the bridge or culvert. If the exclusionary netting fails to prevent nesting (i.e., birds are able to bypass barriers and build nests within the exclusionary netting), all construction activities associated with the bridge or culvert must be postponed until August 31st when the breeding season is complete.

    d. During construction activities, exclusionary netting shall be inspected for holes or other defects that impair the netting's ability to exclude phoebes, swallows, or bats from inhabiting the bridge or culvert.

Indiana Bat and Gray Bat Specific Special Provisions

These special provisions apply specifically to stream corridors that are located within Cherokee County, which include Streams 43, 44, 46, 47, 48, 49, 51, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, and 65. However, coordination with the US Fish and Wildlife Service (USFWS) should be conducted prior to construction to determine if these special provisions also apply to stream crossings in Cobb County.

3. The following special provisions will be implemented for the Indiana bat and gray bat:
    a. Schedule tree removal in construction zones from October 15 to March 31 to prevent disturbance to trees that may harbor the Indiana bat summer colonies or gray bat foraging habitat.
    b. Minimize tree clearing within construction limits, and limit it to that absolutely necessary to complete the project.
    c. Revegetate disturbed areas with tree species that produce sloughing bark and snags, such as silver maple (*Acer saccharinum*), sugar maple (*Acer saccharum*), bitternut hickory (*Carya cordiformis*), pignut hickory (*Carya glabra*), shellbark hickory (*Carya laciniosa*), shagbark hickory (*Carya ovata*), mockernut hickory (*Carya tomentosa*), white ash (*Fraxinus americana*), green ash (*Fraxinus pennsylvanica*), and white oak (*Quercus alba*). If the contractor wishes to use any other species than the aforementioned species, or if these species are not commercially available, it is the contractor's responsibility to consult with the GDOT Office of Environmental Services for approval of selected species to be used for revegetation. Preserve surface water quality within the Indiana bat and gray bat forage areas by minimizing stream-crossing impacts. Channel work will be limited to the construction limits. Riprap will extend below the low-water level.
    d. In order to protect forage areas for the Indiana bat and gray bat, no equipment will be allowed to operate directly in streams. Staging, refueling and cleanup areas will not be allowed alongside streams. GDOT BMPs will be in place during project construction.
    e. Hollow trees, trees with sloughing bark, and other large trees that fall within the project limits will be avoided to the maximum practical extent and delineated by special notes in the plans and delimited using measures such as special fencing during construction.

f. Initiate additional Section 7 coordination and consultation with USFWS that may be required as a result of the passage of time or the listing of species/modification of critical habitat.

Aquatic Species Specific Special Provisions

4. If it becomes necessary to work within Streams 1 (Rottenwood Creek) and Stream 2 (Poplar Creek), a relocation survey for the Chattahoochee crayfish may be required. Coordination with the GDOT Ecologist shall be conducted prior to construction at these locations to determine if a relocation survey will be required.

5. In-stream work will not be permitted in Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5), Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60) from March 1 through June 31 due to potential spawning of the Cherokee darter, lined chub, bluestripe shiner, highscale shiner, delicate spike, and Chattahoochee crayfish. All grading associated with these streams shall be completed between July 1 and February 28.

6. The existing channel width and bank height of each stream will be maintained at the crossings to avoid changes in stream velocity after project construction. Channel modifications will not be allowed beyond the culvert structure and no channel modification will be allowed at streams that do not require culvert replacement/extension.

7. Temporary erosion control devices shall be installed before any other work will be allowed to be performed.

8. Construction equipment will not operate in Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60). All excavation will be conducted from a stable stream bank or road surface.

9. Vegetation removal within the project construction limits and right-of-way will be limited to the absolute minimum necessary to construct the project.

10. Concrete debris, paving materials, litter, bridge falsework, demolition debris, or any other materials shall not be allowed to fall or be placed into Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60).

11. The Contractor will be required to grade an area to completion once the area is disturbed to minimize the time the area is exposed to potential erosion. All disturbed soil, excavation spoil, and stockpiled materials shall be mulched daily or covered with approved erosion control mats. Stockpiled materials shall be placed to prevent rain runoff from washing the materials into Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60).

12. All surface water runoff from undisturbed areas shall be diverted to prevent flow across disturbed areas. This may be accomplished through the use of permanent pipes, temporary pipes, or slope drains. The Contractor may propose alternate methods provided prior approval of the Engineer is obtained.

13. All erosion control devices shall be closely monitored and maintained. As maintenance is performed on silt fences, silt gates, slope drains, filtration ponds, and other erosion control devices, the materials removed shall be placed in such a manner to prevent these materials from entry into Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60).

14. The Contractor's worksite erosion control supervisor (WECS) shall monitor all erosion control devices on a daily basis. When a visible increase in turbidity is observed in Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60), construction shall be stopped until the source can be determined. Immediate corrective measures shall be taken before work will be allowed to continue.

15. The Contractor will be expected to immediately modify the erosion control plan to correct any circumstances that may cause or allow pollutants from the work site to enter or damage habitat associated with Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60).

16. The Contractor is prohibited from using borrow sites or stockpiling dirt within 200 feet of stream banks.

17. Equipment staging areas and equipment maintenance (including oil changes) areas shall be located at least 200 feet from stream banks to minimize the potential for wash water, petroleum products, or other contaminants from construction equipment entering Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60).

18. The Contractor shall not use pesticides or herbicides (including those for right-of-way maintenance during construction activities) within 200 feet of Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60).

19. With regards to Rottenwood Creek (Streams 1, 6, and 7), unnamed tributaries to Rottenwood Creek (Streams 1A and 5)**,** Sope Creek (Stream 14), an unnamed tributary to Clark Creek (Stream 29), unnamed tributaries to Noonday Creek (Streams 21 and 37), Noonday Creek (Stream 30), Chastain Branch (Stream 34), and the Little River (Stream 60), the Contractor will maintain a buffer of existing vegetation on both stream banks by doing no clearing and grubbing in that zone except as needed to complete construction. The buffer will be twenty-five feet wide. These areas will be labeled "Environmentally Sensitive Areas" on the plans.

Incident Reporting Requirements

20. In the event any incident occurs that causes harm to Eastern phoebes, cliff swallows, barn swallows, Indiana bat, gray bat, Cherokee darter, Chattahoochee crayfish, highscale shiner, bluestripe shiner, delicate spike, or the lined chub or that could be detrimental to the continued existence of these species along the project corridor, the Contractor shall report the incident immediately to the Project Engineer who in turn will notify:
    a. US Fish and Wildlife Service, Athens Field Office at (706) 613-9493; and/or the Nongame/Endangered Wildlife Program, Georgia Department of Natural Resources office at (478) 994-1438;
    b. Federal Highway Administration (FHWA), Georgia Division at (404) 562-3630; and
    c. Glenn Bowman, Georgia Department of Transportation, Office of Environmental Services at (404) 631-1101.

    In the event of possible harm to Eastern phoebes, cliff swallows, barn swallows, Indiana bat, gray bat, Cherokee darter, Chattahoochee crayfish, highscale shiner, bluestripe shiner, delicate spike, or the lined chub, the above agencies and the Project Engineer shall be notified immediately and all activity shall cease pending consultation by the Department with the U. S. Fish and Wildlife Service and/or GDNR/WRD and the lead Federal Agency.

21. Following project completion, a report summarizing any incidents with Eastern phoebes, cliff swallows, barn swallows, Indiana bat, gray bat, Cherokee darter, Chattahoochee crayfish, highscale shiner, bluestripe shiner, delicate spike, or the lined chub shall be submitted by the Contractor to the:
    a. the Project Engineer;
    b. US Fish and Wildlife Service, 105 West Park Drive, Suite D, Athens, GA 30606;
    c. Federal Highway Administration, 61 Forsyth Street, S.W., Suite 17T100, Atlanta, GA 30303;
    d. Nongame/Endangered Wildlife Program, Georgia Department of Natural Resources, 115 Rum Creek Dr, Forsyth, GA 31029 and;
    e. Georgia Department of Transportation, Office of Environmental Services, 600 West Peachtree Street N.W., Atlanta, GA 30308.
22. All costs pertaining to any requirement contained herein shall be included in the overall bid submitted unless such requirement is designated as a separate Pay Item in the Proposal.

STREAMS AND WETLANDS

EC-4, EC-25, EC-46

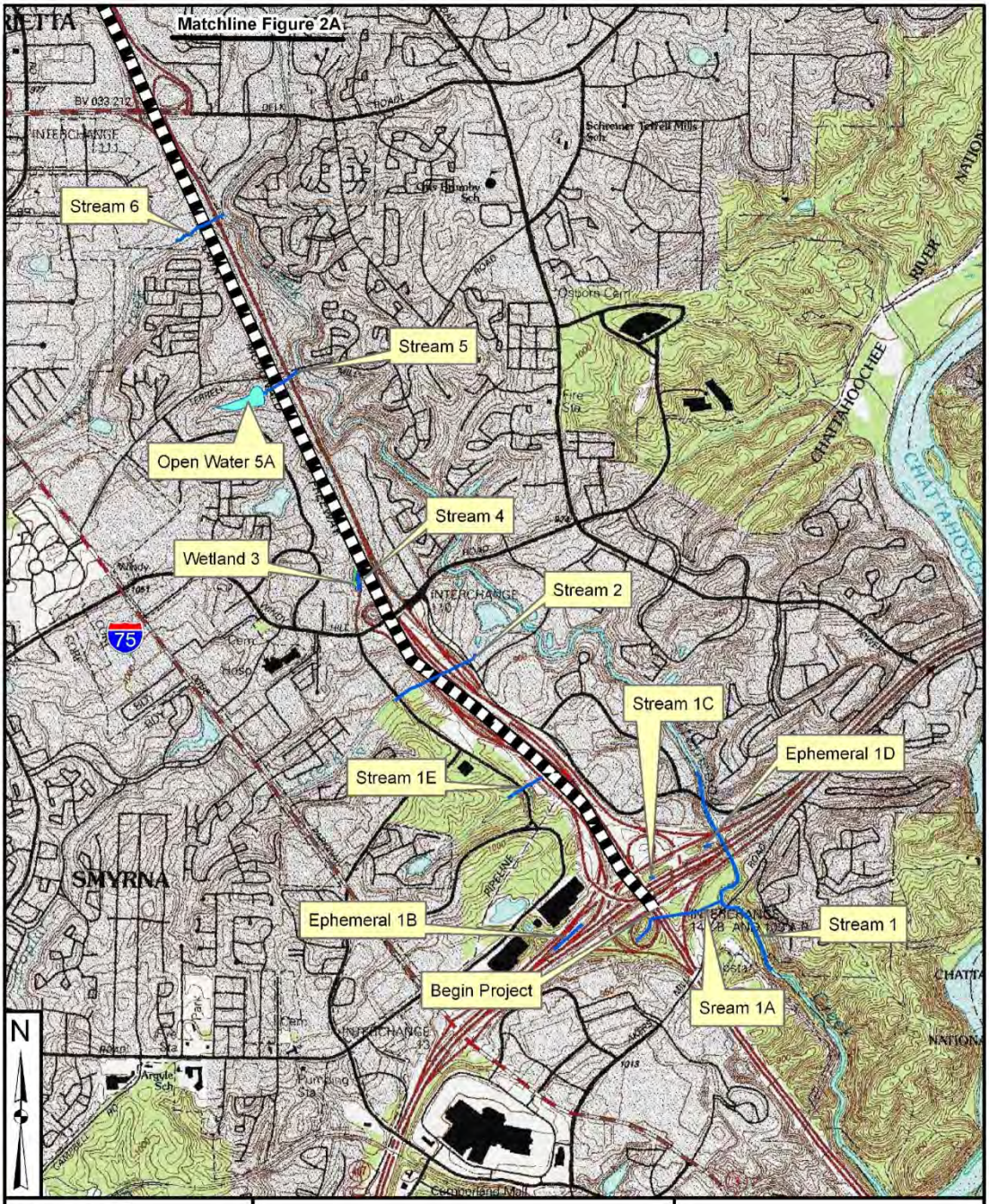


Figure 2A: Water Resources

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

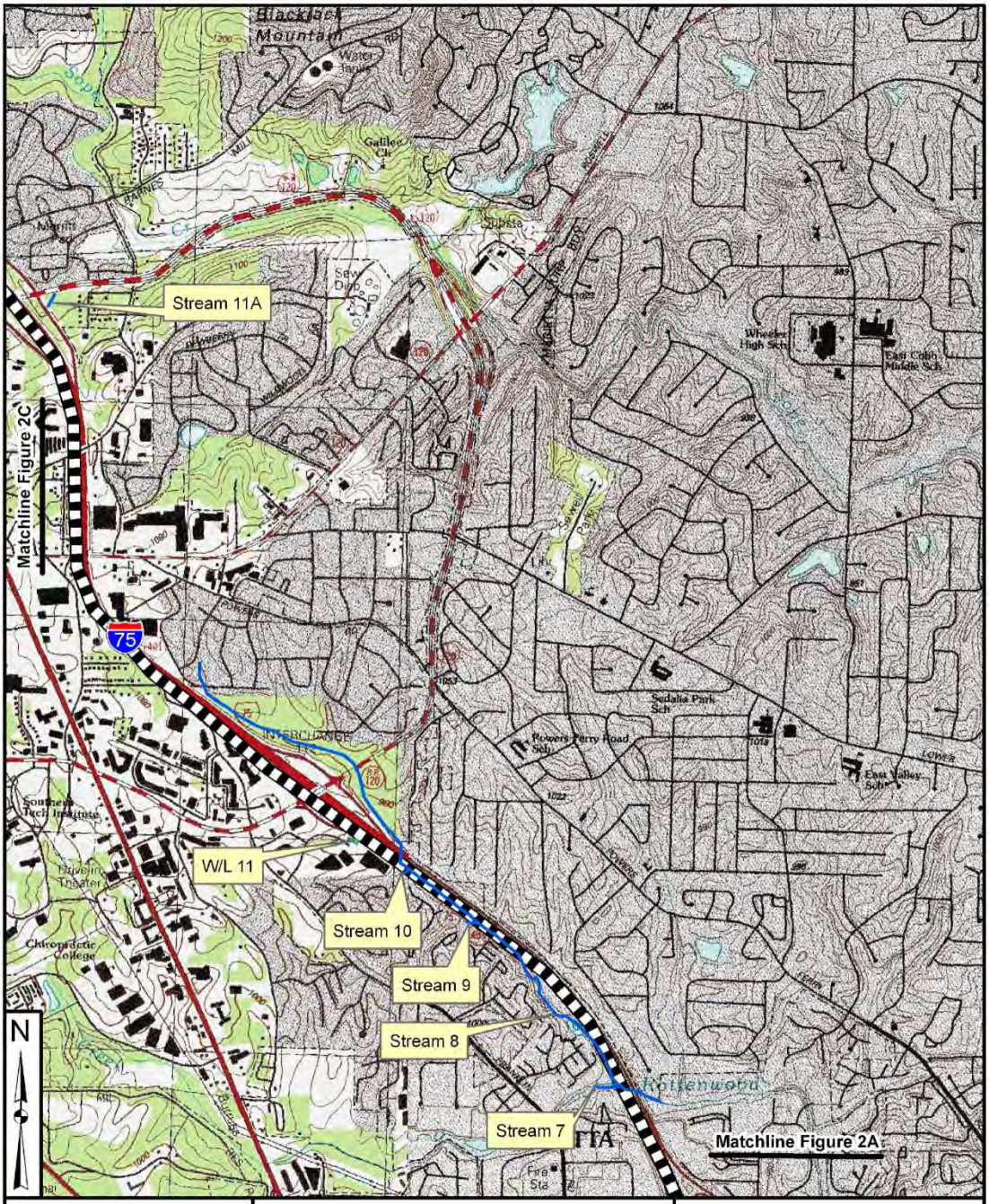


Figure 2B: Water Resources

0 0.25 0.5 0.75 1

Miles

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

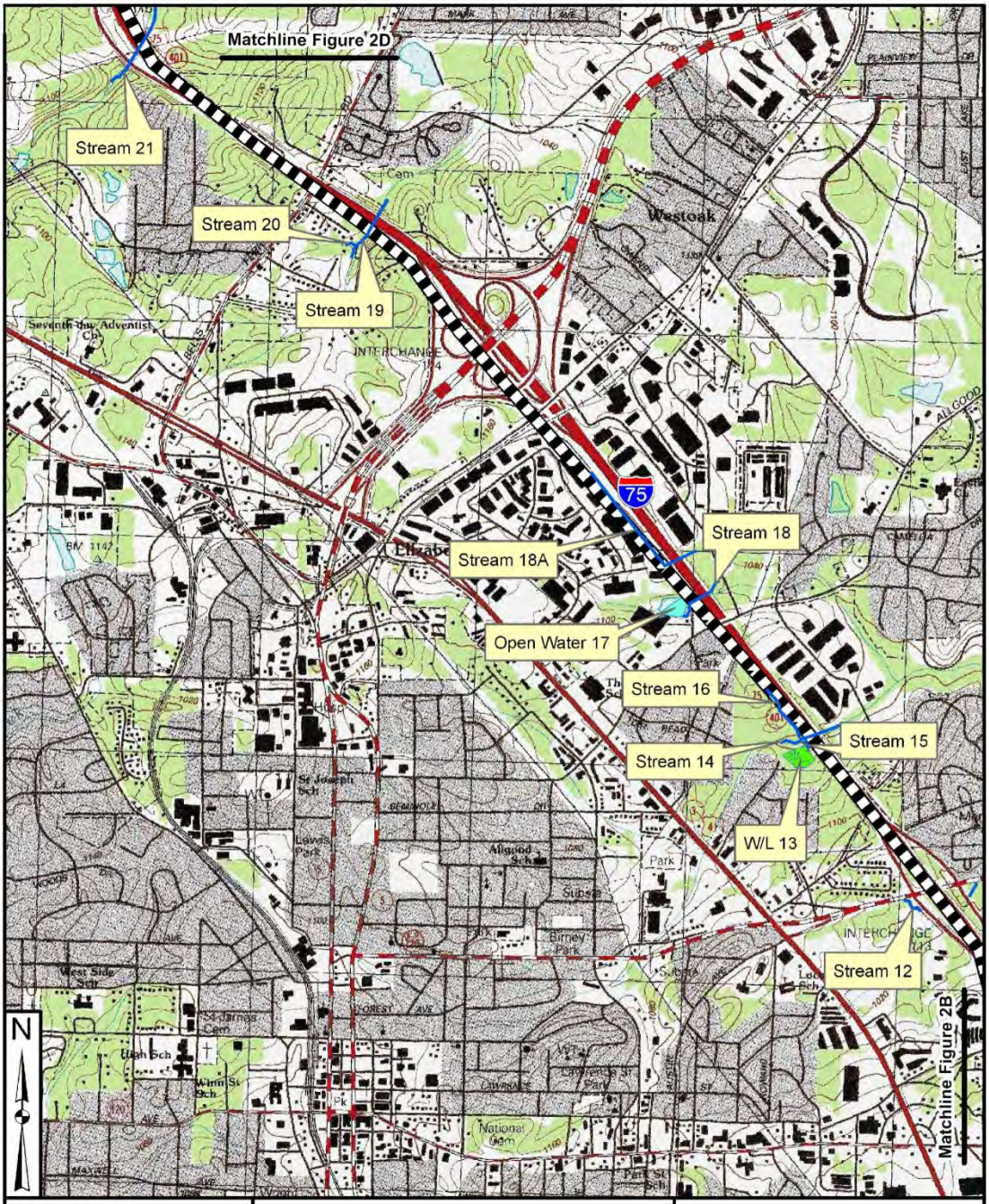


Figure 2C: Water Resources

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

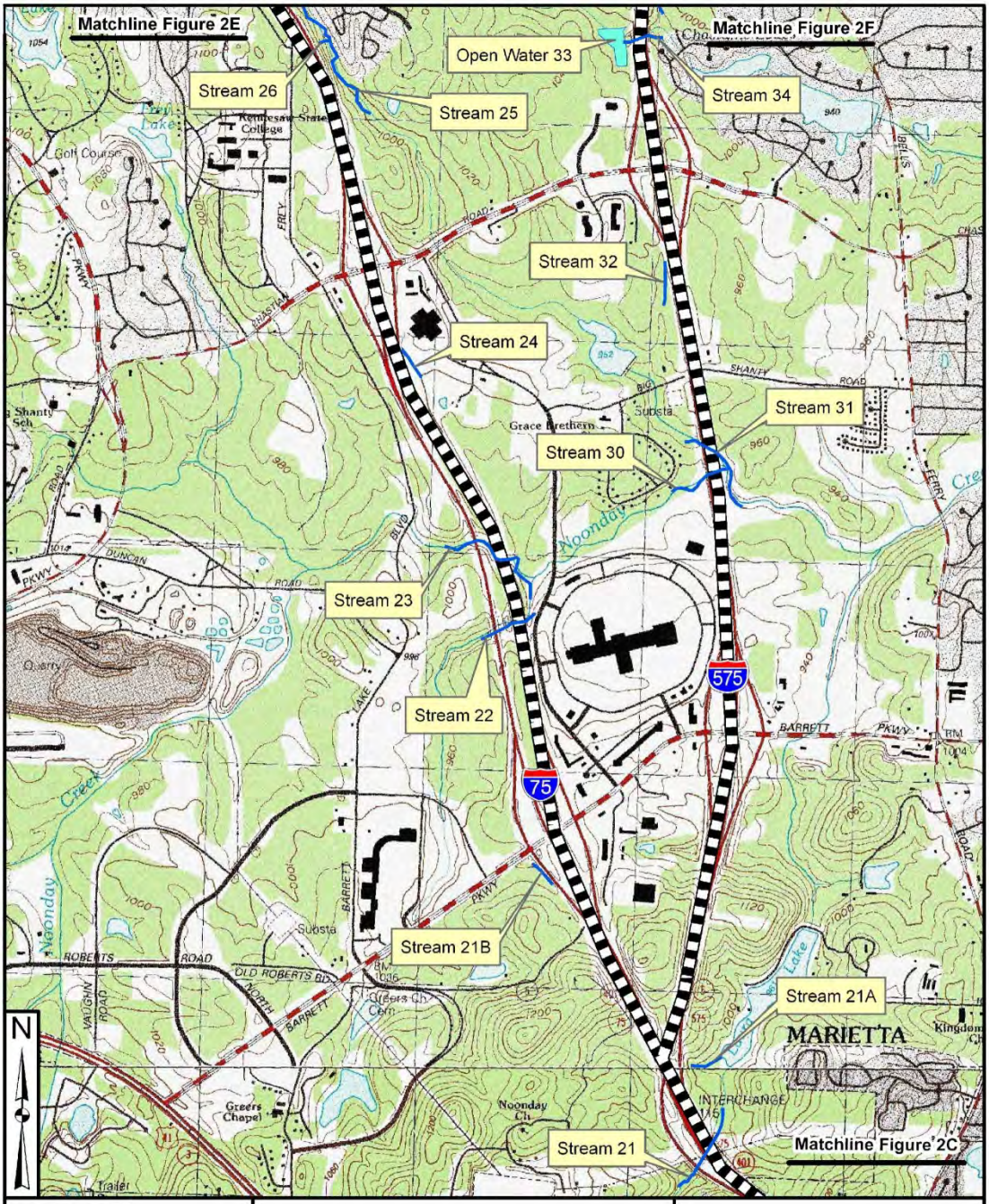


Figure 2D: Water Resources

0 0.25 0.5 0.75 1

Miles

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

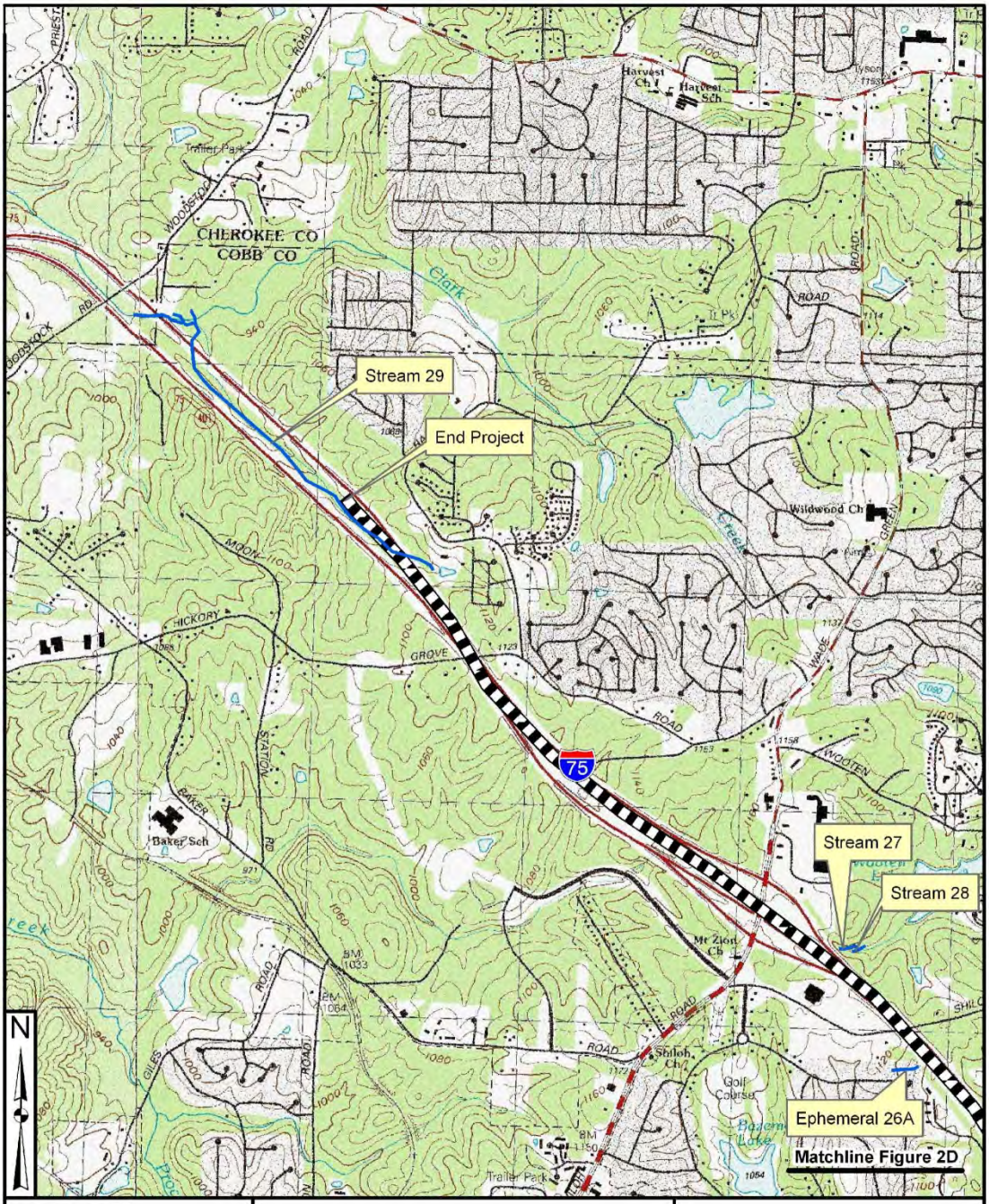


Figure 2E: Water Resources

0 0.25 0.5 0.75 1

Miles

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

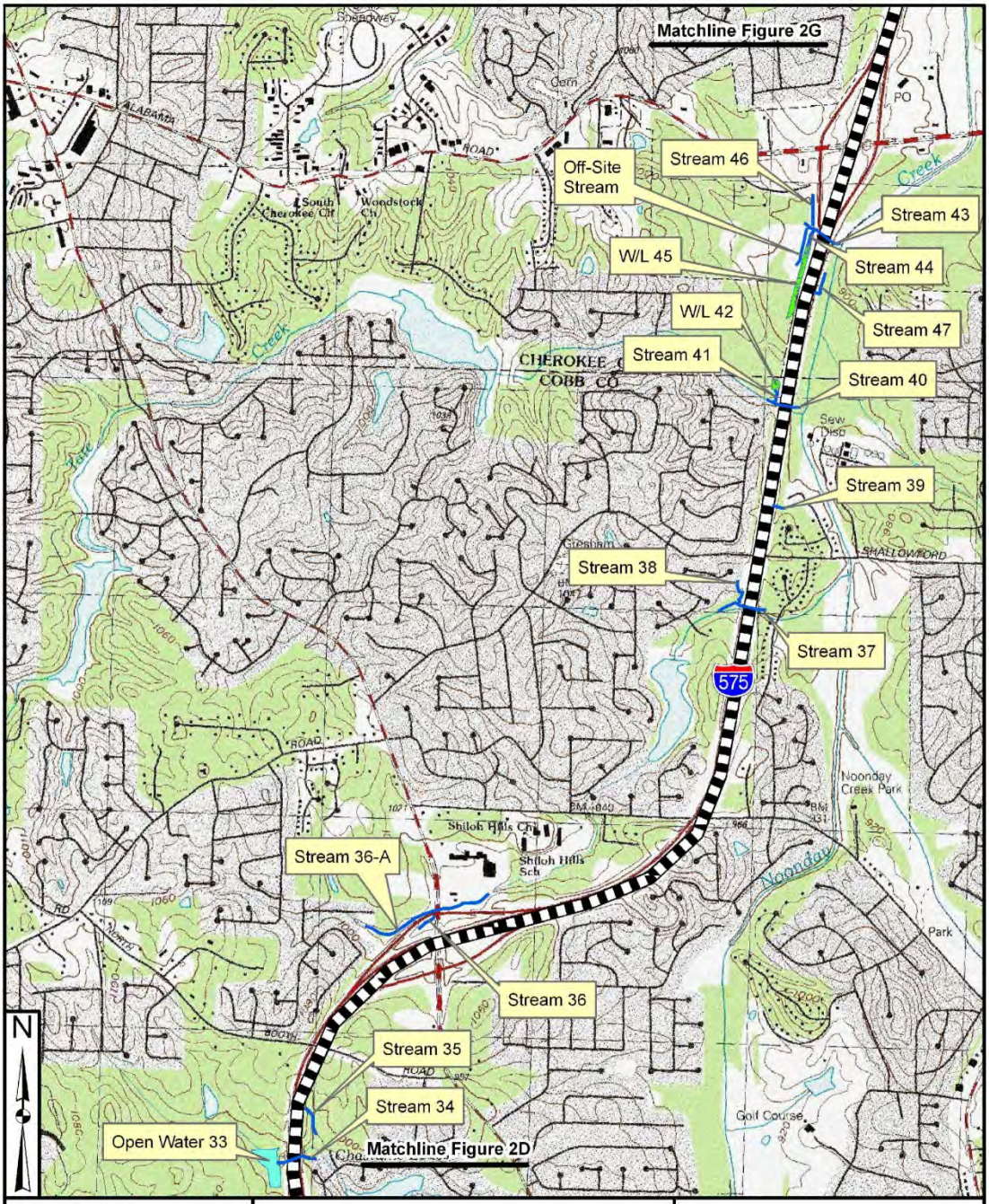


Figure 2F: Water Resources

0 0.25 0.5 0.75 1

Miles

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

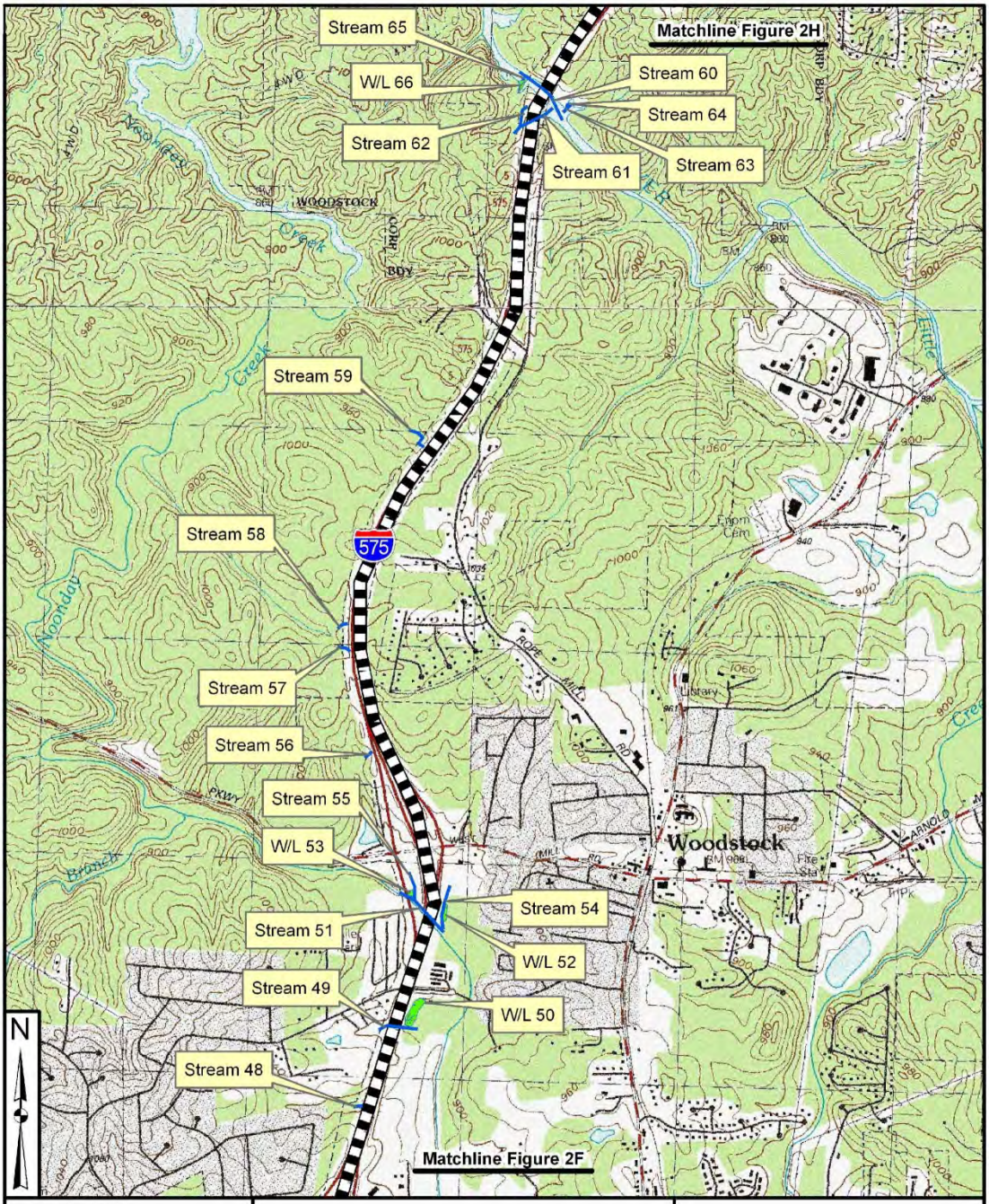


Figure 2G: Water Resources

0 0.25 0.5 0.75 1

Miles

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

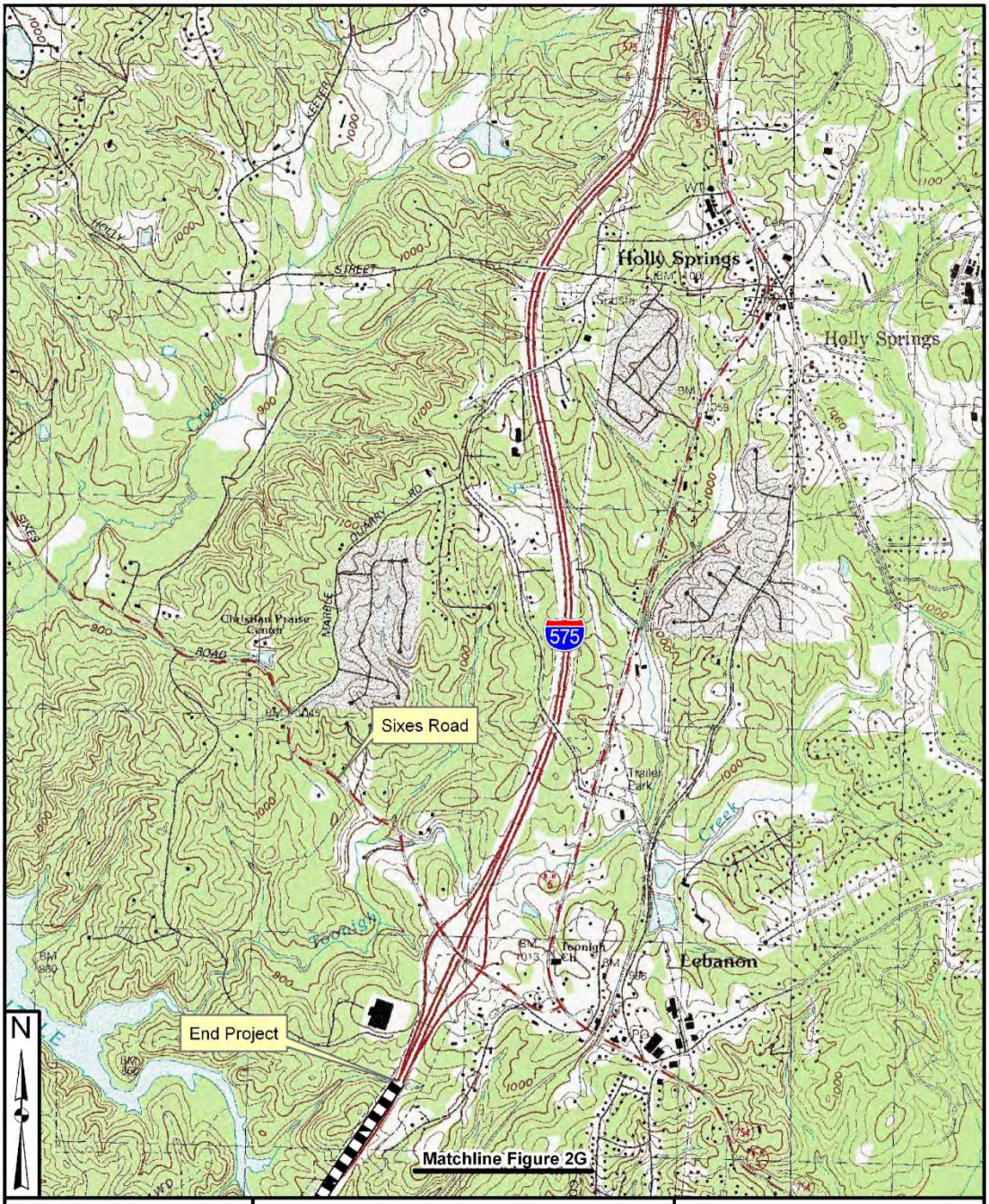


Figure 2H: Water Resources

0 0.25 0.5 0.75 1

Miles

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table						
Resource Name	Resource Type or Cowardin Classification	HUC (8-digit) Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland, Open Water, and Stream Impacts: Wetland/Open Water Impacts (Acres)	Wetland, Open Water, and Stream Impacts: Stream Impacts (Linear Feet/Type of Impact)
Stream 1 Rottenwood Creek	Perennial	03130001 33°53'33.24''N, 84°27' 25.08'' W	Yes	Yes	0.0	0.0
Stream 1A Unnamed Rottenwood Creek Tributary	Perennial	03130001 33°53'22.667''N 84°27'27.852''W	Yes	Yes	0.0	0.0
Stream 1B Unnamed Rottenwood Creek Tributary	Ephemeral	03130001 33°53'18.851''N 84°27'52.338''W	No	No	0.0	150 Linear Feet 0.014 Acres Placement of Fill Material. Currently stream is considered a non-jurisdictional ephemeral channel and would not require mitigation. (Not reported in impact total)
Stream 1C Unnamed Rottenwood Creek Tributary	Perennial	03130001 33°53'26.947''N 84°27'38.286''W	Yes	No	0.0	Placement of 20 linear foot long 18-inch RCP at current location of concrete lined channel (Not reported in impact total since RCP will be placed within existing footprint of concrete channel)
Stream 1D Unnamed Rottenwood Creek Tributary	Ephemeral	03130001 33°53'32.06''N, 84°27'28.072"W	No	No	0.0	0.0
Stream 1E Unnamed Rottenwood Creek Tributary	Perennial	03130001 33°53'41.537''N, 84°27'58.707''W	Yes	No	0.0	25 Linear Feet 0.009 Acre Culvert Extension
Stream 2 Poplar Creek	Perennial	03130001 33°53'56.57''N, 84°28' 19.16'' W	Yes	Yes	0.0	0.0
Wetland 3	PFO1	03130001 33° 54'10.33''N, 84° 28'30.63''W	No	No	0.0	0.0
Stream 4 Unnamed Rottenwood Creek Tributary	Intermittent	03130001 33°54'13.40"N, 84°28'31.11"'W	Yes	No	0.0	0.0

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table (cont.)						
		HUC (8-digit)			Wetland, Open Water, and Stream Impacts	
Resource Name	Resource Type or Cowardin Classification	Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland/Open Water Impacts (Acres)	Stream Impacts (Linear Feet/Type of Impact)
Stream 5 Unnamed Rottenwood Creek Tributary	Perennial	03130001 33°54′40.78′′N, 84°28′46.80′′W	Yes	Yes	0.0	100 Linear Feet 0.02 Acre Culvert Extension
Open Water 5A	LOW	03130001 33°54′39.259′′N 84°28′50.173′′W	Yes	No	0.0	0.0
Stream 6 House Creek	Perennial	03130001 33°55′5.53′′N, 84°29′1.67′′W	Yes	Yes	0.0	0.0
Stream 7 Rottenwood Creek	Intermittent	03130001 33°55′43.73′′N, 84°29′ 22.44′′W	Yes	Yes	0.0	0.0
Stream 8 Unnamed Rottenwood Creek Tributary	Perennial	03130001 33°56′5.88′′N, 84°29′44.42′′W	Yes	No	0.0	1,450 Linear Feet 0.92 Acres Channel Relocation
Stream 9 Unnamed Rottenwood Creek Tributary	Intermittent	03130001 33°56′16.27′′N, 84°30′1.06′′W	Yes	No	0.0	0.0
Stream 10 Unnamed Rottenwood Creek Tributary	Intermittent	03130001 33°55′51.10′′N, 84°29′21.79′′W	Yes	No	0.0	0.0
Wetland 11	PEM1	03130001 33°56‵20.64′′N, 84°30′9.45′′W	No	No	0.0	0.0
Stream 11A Unnamed Sope Creek Tributary	Perennial	03130001 33°57′41.448′′N84°31′3.654′′W	Yes	No	0.0	0.0
Stream 12 Unnamed Rottenwood Creek Tributary	Intermittent	03130001 33°57′39.83′′N, 84°31′15.87′′W	Yes	No	0.0	0.0

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table (cont.)						
Resource Name	Resource Type or Cowardin Classification	HUC (8-digit) Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland, Open Water, and Stream Impacts: Wetland/Open Water Impacts (Acres)	Wetland, Open Water, and Stream Impacts: Stream Impacts (Linear Feet/Type of Impact)
Wetland 13	PFO1	03130001 33°58′2.13′′N, 84°31′35.56′′W	No	No	0.0	0.0
Stream 14 Sope Creek	Perennial	03130001 33°58′3.67′′N, 84°31′35.76′′W	Yes	Yes	0.0	0.0 The end of the existing culvert would be replaced. This would occur within the footprint of the existing culvert and no new impacts would occur.
Stream 15 Unnamed Sope Creek Tributary	Intermittent	03130001 33°58′2.95′′N, 84°31′34.69′′W	Yes	No	0.0	0.0
Stream 16 Unnamed Sope Creek Tributary	Intermittent	03130001 33°58′5.75′′N, 84°31′37.18′′W	Yes	No	0.0	250 Linear Feet 0.03 Acre Relocation of a section of the stream channel.
Open Water 17	LOW	03130001 33°58‘24.34′′N, 84°31′57.77′′W	Yes	No	0.0	0.0
Stream 18 Unnamed Sope Creek Tributary	Intermittent	03130001 33°58′24.57′′N, 84°31′55.48′′W	Yes	No	0.0	0.0
Stream 18A Unnamed Sope Creek Tributary	Perennial	03130001 33°58′33.567′′N, 84°32′3.654′′W	Yes	No	0.0	1,400 Linear Feet 0.10 Acre Channel Relocation
Stream 19 Unnamed Noonday Creek Tributary	Perennial	03150104 33°59′19.62′′N, 84°32′54.10′′W	Yes	No	0.0	0.0

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table (cont.)						
		HUC (8-digit)			Wetland, Open Water, and Stream Impacts	
Resource Name	Resource Type or Cowardin Classification	Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland/Open Water Impacts (Acres)	Stream Impacts (Linear Feet/Type of Impact)
Stream 20 Unnamed Noonday Creek Tributary	Perennial	03150104 33°59′18.45′′N, 84°32′58.01′′W	Yes	No	0.0	0.0
Stream 21 Unnamed Noonday Creek Tributary	Perennial	03150104 33°59′50.65′′N, 84°33′ 0.27′′W	Yes	Yes	0.0	0.0
Stream 21A Unnamed Noonday Creek Tributary	Intermittent	03150104 34°0′1.694′′N, 84°33′39.05′′W	Yes	No	0.0	0.0
Stream 21B Unnamed Noonday Creek Tributary	Intermittent	03150104 34°0′31.103′′N, 84°34′7.246′′W	Yes	No	0.0	0.0
Stream 22 Unnamed Noonday Creek Tributary	Perennial	03150104 34°1′7.07′′N, 84°34′12.35′′W	Yes	No	0.0	50 Linear Feet 0.01 Acre Culvert Extension
Stream 23 Noonday Creek	Perennial	03150104 34°1′17.25′′N, 84°34′15.29′′W	Yes	No	0.0	0.0
Stream 24 Unnamed Noonday Creek Tributary	Ephemeral	03150104 34°1′45.99′′N, 84°34′30.26′′W	No	No	0.0	0.0

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table (cont.)						
Resource Name	Resource Type or Cowardin Classification	HUC (8-digit) Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland, Open Water, and Stream Impacts: Wetland/Open Water Impacts (Acres)	Wetland, Open Water, and Stream Impacts: Stream Impacts (Linear Feet/Type of Impact)
Stream 25 Unnamed Noonday Creek Tributary	Perennial	03150104 34°2′26.55′′N, 84°34′41.90′′W	Yes	No	0.0	0.0
Stream 26 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°2′0.828′′N, 84°34′7.325′′W	Yes	No	0.0	0.0
Stream 26A Unnamed Noonday Creek Tributary	Ephemeral	03150104 34°2′36.15′′N, 84°34′47.64′′W	No	No	0.0	0.0
Stream 27 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°3′7.81′′N, 84°35′22.47′′W	Yes	No	0.0	0.0
Stream 28 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°3′6.56′′N, 84°35′18.31′′W	Yes	No	0.0	0.0
Stream 29 Unnamed Clark Creek Tributary	Perennial	03150104 34°4′15.59′′N, 84°36′53.96′′W	Yes	Yes	0.0	0.0
Stream 30 Noonday Creek	Perennial	03150104 34°1′29.88′′N, 84°33′ 5.73′′W	Yes	Yes	0.0	10.0 Linear Feet 0.0011 Acre Two 4′6″ diameter concrete piers placed in stream channel (Fill Impact).
Stream 31 Unnamed Noonday Creek Tributary	Perennial	03150104 34°1′33.78′′N, 84°33′37.93′′W	Yes	No	0.0	0.0

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table (cont.)						
Resource Name	Resource Type or Cowardin Classification	HUC (8-digit) Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland, Open Water, and Stream Impacts: Wetland/Open Water Impacts (Acres)	Wetland, Open Water, and Stream Impacts: Stream Impacts (Linear Feet/Type of Impact)
Stream 32 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°2′0.84′′N, 84°33′44.26′′W	Yes	No	0.0	0.0
Open Water 33	LOW	03150104 34°2′33.47′′N, 84°33′52.34′′W	Yes	No	0.0	0.0
Stream 34 Chastain Branch	Perennial	03150104 34°2′34.45′′N, 84°33′50.60′′W	Yes	Yes	0.0	0.0
Stream 35 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°2′43.15′′N, 84°33′ 46.20′′W	Yes	No	0.0	0.0
Stream 36 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°3′11.10′′N, 84°33′24.23′′W	Yes	No	0.0	0.0
Stream 36-A Unnamed Noonday Creek Tributary	Intermittent	03150104 34°3′8.995′′N, 84°33′30.935′′W	Yes	No	0.0	0.0
Stream 37 Unnamed Noonday Creek Tributary	Perennial	03150104 34°3′58.23′′N, 84°32′29.40′′W	Yes	Yes	0.0	0.0
Stream 38 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°4′0.19′′N, 84°32′28.77′′W	Yes	No	0.0	0.0
Stream 39 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°4′13.74′′N, 84°32′21.81′′W	Yes	No	0.0	0.0

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table (cont.)						
Resource Name	Resource Type or Cowardin Classification	HUC (8-digit) Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland, Open Water, and Stream Impacts: Wetland/Open Water Impacts (Acres)	Wetland, Open Water, and Stream Impacts: Stream Impacts (Linear Feet/Type of Impact)
Stream 40 Unnamed Noonday Creek Tributary	Perennial	03150104 34°4′28.48′′N, 84°32′22.18′′W	Yes	No	0.0	0.0
Stream 41 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°4′29.39′′N, 84°32′22.00′′W	Yes	No	0.0	0.0
Wetland 42	PFO1	03150104 34° 4‘30.07′′N, 84° 32′22.01′′W	No	No	No	No
Stream 43 Unnamed Noonday Creek Tributary	Perennial	03150104 34°4′53.18′′N, 84°32′11.52′′W	Yes	No	0.0	0.0
Stream 44 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°4′52.67′′N, 84°32′16.40′′W	Yes	No	0.0	0.0
Wetland 45	PFO1	03150104 34°4′50.35′′N, 84° 32′16.90′′W	No	No	No	No
Stream 46 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°4′57.37′′N, 84°32′15.44′′W	Yes	No	0.0	0.0
Stream 47 Unnamed Noonday Creek Tributary	Perennial	03150104 34°4′44.98′′N, 84°32′14.74′′W	Yes	No	0.0	0.0

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table (cont.)						
Resource Name	Resource Type or Cowardin Classification	HUC (8-digit) Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland, Open Water, and Stream Impacts: Wetland/Open Water Impacts (Acres)	Wetland, Open Water, and Stream Impacts: Stream Impacts (Linear Feet/Type of Impact)
Stream 48 Unnamed Noonday Creek Tributary	Perennial	03150104 34°5′30.10′′N, 84°32′1.80′′W	Yes	No	0.0	0.0
Stream 49 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°5′41.75′′N, 84°31′53.03′′W	Yes	No	0.0	0.0
Wetland 50	PSS1	03150104 34°5‘44.38′′N, 84°31′50.48′′W	No	No	No	No
Stream 51 Noonday Creek	Perennial	03150104 34°6′0.34′′N, 84°31′51.29′′W	Yes	No	0.0	10.0 Linear Feet 0.0011 Acre Two 4′6″ diameter concrete piers placed in stream channel (Fill Impact).
Wetland 52	PFO1	03150104 34°5‘58.01′′N, 84°31′46.62′′W	No	No	0.0	0.0
Wetland 53	PFO1	03150104 34°6‘ 2.05′′N, 84° 31′51.61′′W	No	No	0.0	0.0
Stream 54 Unnamed Noonday Creek Tributary	Intermittent	03150104 34°5′58.67′′N, 84°31′47.49′′W	Yes	No	0.0	0.0
Stream 55 Unnamed Noonday Creek Tributary	Perennial	03150104 34°6′2.27′′N, 84°31′51.61′′W	Yes	No	0.0	0.0
Stream 56 Unnamed Noonday Creek Tributary	Perennial	03150104 34°6′20.75″N, 84°31′58.72′′W	Yes	No	0.0	0.0
Stream 57 Unnamed Noonday Creek Tributary	Perennial	03150104 34°6′39.91′′N, 84°32′4.20′′W	Yes	No	0.0	0.0

Table 2. Federal and State Stream, Wetland, and Open Water Summary Table (cont.)						
Resource Name	Resource Type or Cowardin Classification	HUC (8-digit) Lat./Long.	State-Mandated Buffer	Protected Species Habitat	Wetland, Open Water, and Stream Impacts: Wetland/Open Water Impacts (Acres)	Wetland, Open Water, and Stream Impacts: Stream Impacts (Linear Feet/Type of Impact)
Stream 58 Unnamed Noonday Creek Tributary	Perennial	03150104 34°6′43.66′′N, 84°32′4.56′′W	Yes	No	0.0	0.0
Stream 59 Unnamed Noonday Creek Tributary	Perennial	03150104 34°7′2.34′′N, 84°31′56.39′′W	Yes	No	0.0	0.0
Stream 60 Little River	Perennial	03150104 34°8′3.24′′N, 84°31′29.04′′W	Yes	Yes	0.0	14 Linear Feet 0.0013 Acre Two 6′6″ diameter concrete piers placed in stream channel (Fill Impact)
Stream 61 Unnamed Little River Tributary	Intermittent	03150104 34°7′58.70′′N, 84°31′29.34′′W	Yes	No	0.0	0.0
Stream 62 Unnamed Little River Tributary	Intermittent	03150104 34°8′1.70′′N, 84°31′30.96′′W	Yes	No	0.0	0.0
Stream 63 Unnamed Little River Tributary	Intermittent	03150104 34°8′2.35′′N, 84°31′27.12′′W	Yes	No	0.0	0.0
Stream 64 Unnamed Little River Tributary	Intermittent	03150104 34°8′3.03′′N, 84°31′26.11′′W	Yes	No	0.0	0.0
Stream 65 Unnamed Little River Tributary	Perennial	03150104 33°8‘3.11′′N, 84°31′34.00′′W	Yes	No	0.0	0.0
Wetland 66	PEM1	03150104 34°8‘3.88′′N, 84° 31′33.36′′W	No	No	0.0	0.0
Total Wetland, Open Water, and Stream Impacts Per HUC (03130001-11)					0.0	3,225 Linear Feet 1.08 Acres
Total Wetland, Open Water, and Stream Impacts Per HUC (03150104-08)					0.0	84 Linear Feet 0.014 Acres
Total Wetland, Open Water, and Stream Impacts for Entire Project					0.0	3,309 Linear Feet 1.09 Acres


SOUTH ATLANTA RD
I-285
STREAM
GRAPHIC SCALE: 1"= 400'
200 0 200 400

FIGURE A-1

FIGURE A-2


I-285
STREAM
GRAPHIC SCALE: 1"=400'
200 0 200 400
EXISTING CCT BUS TERMINAL
CUMBERLAND BLVD.
CUMBERLAND MALL

FIGURE A-3


EXIT 20B-A
Atlanta
Chattanooga
1¾ MILES
EXIT 20D
Chattanooga
2 MILES
WEST
Birmingham
Montgomery
I-285
GRAPHIC SCALE: 1"=400'
200 0 200 400

FIGURE A-4


STREAM
CHATTAHOOCHEE RIVER
AKERS MI
SQUARE
B
GRAPHIC SCALE: 1"= 400'
200 0 200 400

FIGURE A-5


I-75 SB
I-75 NB
STREAM 29
STREAM 29
COBB COUNTY
CHEROKEE COUNTY
WOODSTOCK ROAD
STREAM
GRAPHIC SCALE: 1"= 400'
200 0 200 400

FIGURE A-6


COBB COUNTY
CHEROKEE COUNTY
WOODSTOCK ROAD
WOODSTOCK ROAD
STREAM 29
I-75
PRIEST ROAD
GRAPHIC SCALE: 1"= 400'
200 0 200 400
STREAM

FIGURE A-7


PRIEST ROAD
I-75
CANTON ROAD / S.R. 92
CHEROKEE ROAD / S.R. 92
GRAPHIC SCALE: 1"= 400'
200 0 200 400

FIGURE A-8

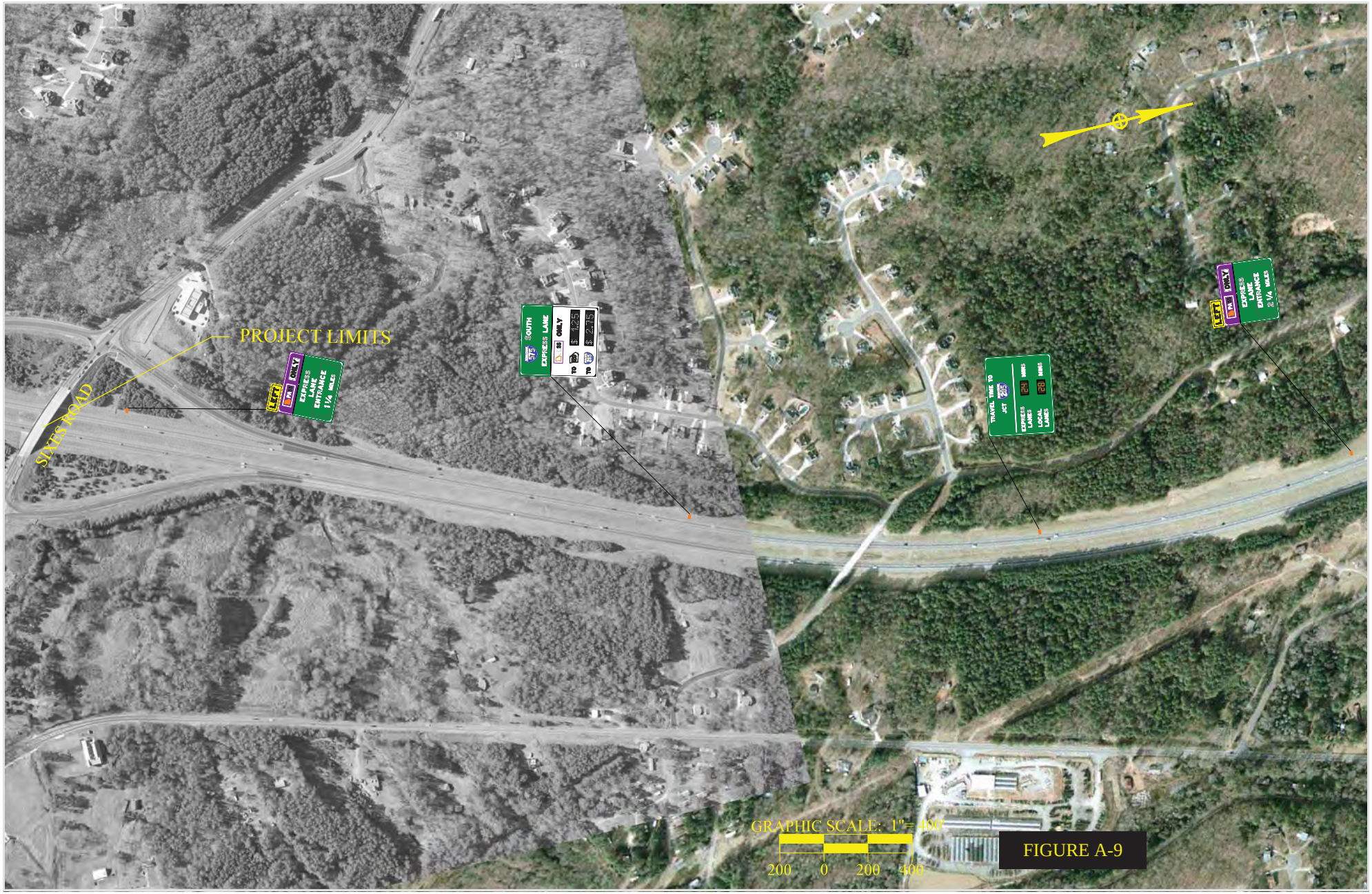


FIGURE A-9


TERRELL MILL RD.
75 EXPRESS LANES
NORTH
SOUTH
I-85 EXPRESS LANES ONLY
GRAPHIC SCALE: 1"= 150'
150
0
150
300
STREAM
OW-5H

FIGURE A-10

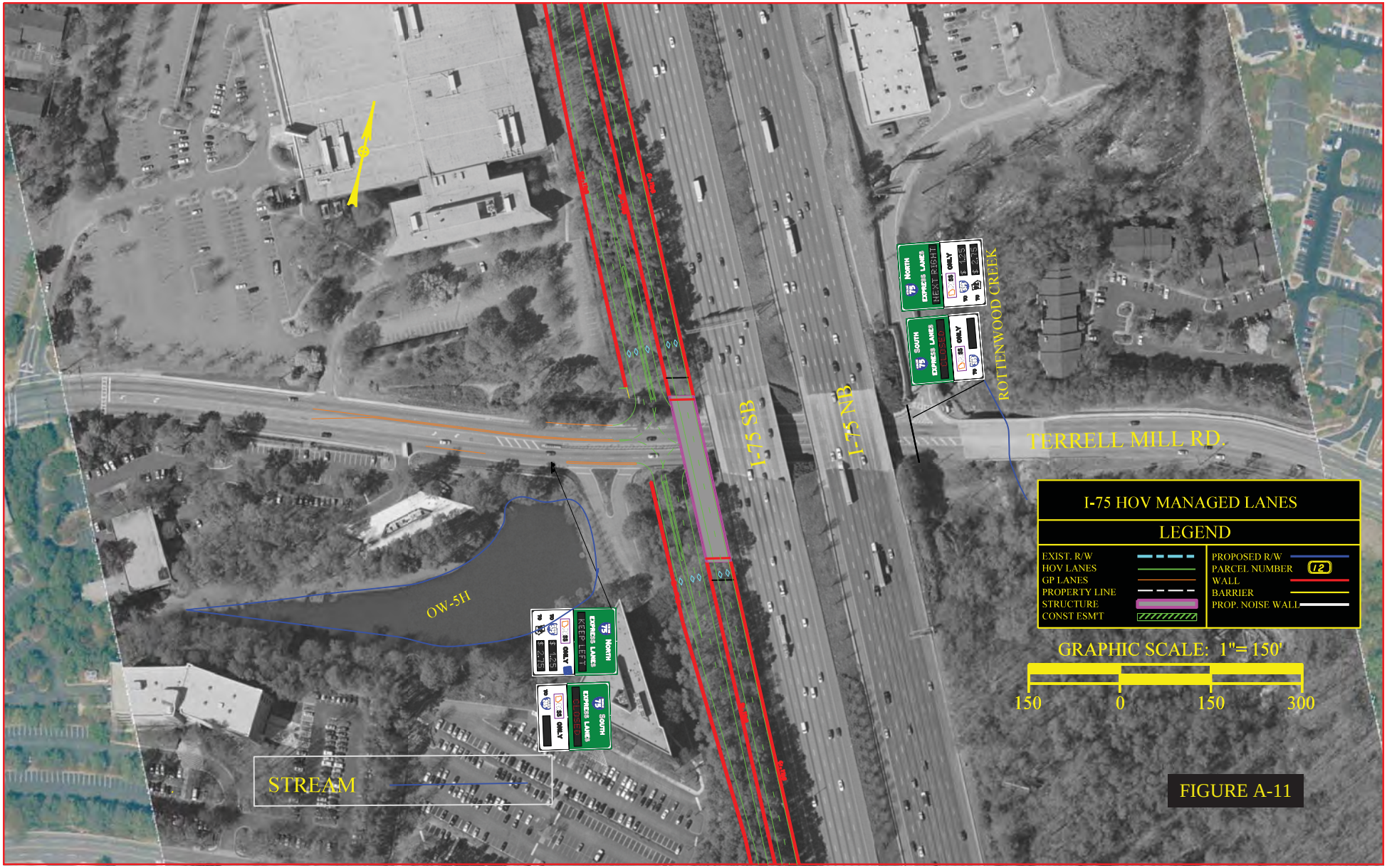

I-75 SB
I-75 NB
ROTTENWOOD CREEK
TERRELL MILL RD.
OW-511
STREAM
I-75 HOV MANAGED LANES
LEGEND
EXIST. R/W
HOV LANES
GP LANES
PROPERTY LINE
STRUCTURE
CONST ESM'T
PROPOSED R/W
PARCEL NUMBER
WALL
BARRIER
PROP. NOISE WALL
GRAPHIC SCALE: 1"= 150'
150
0
150
300

FIGURE A-11


ROTTENWOOD CREEK
TERRELL MILL RD.
STREAM
TERRELL MILL RD
GRAPHIC SCALE: 1"= 150'
150 0 150 300

FIGURE A-12

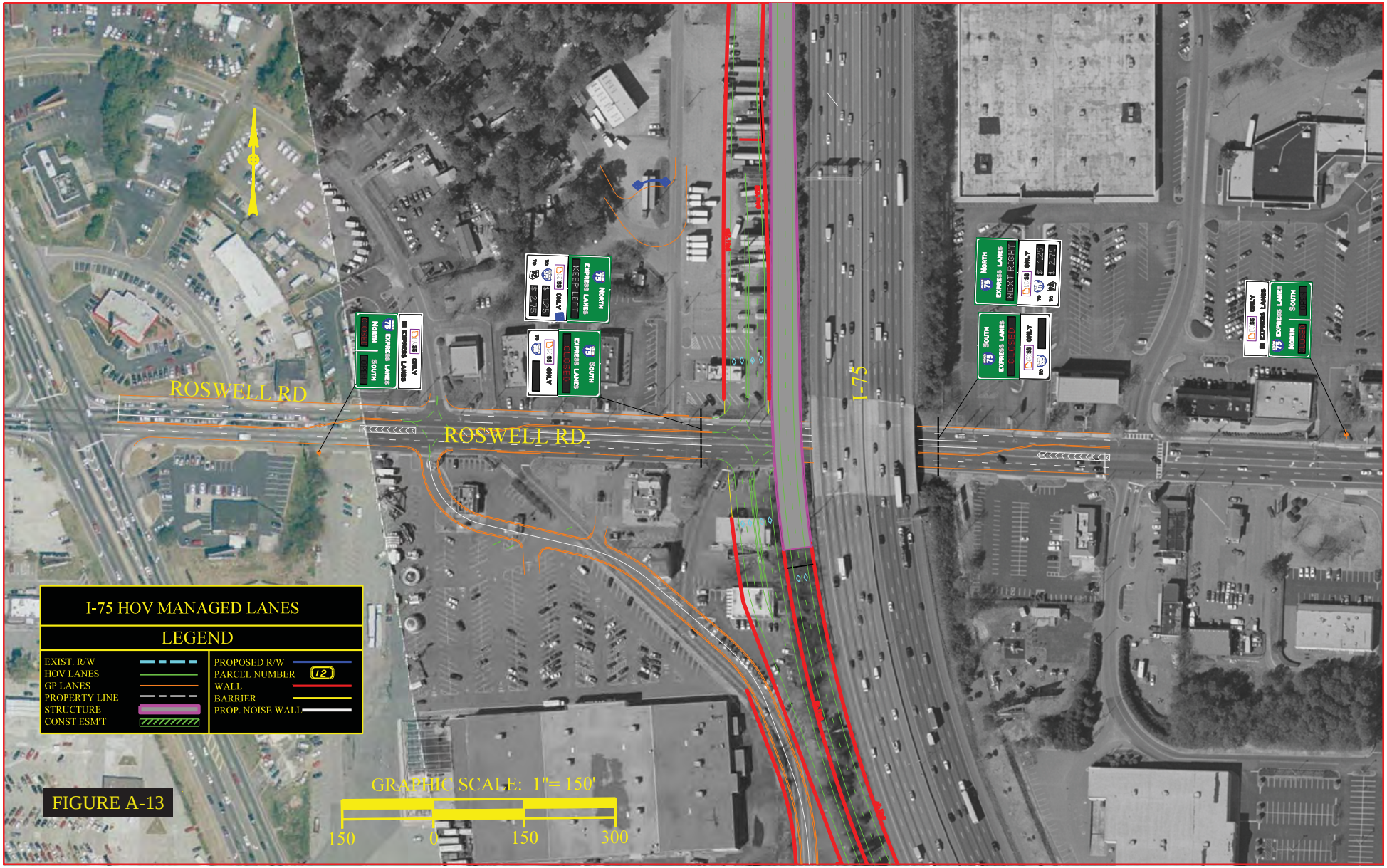

ROSWELL RD
ROSWELL RD.
I-75
I-75 HOV MANAGED LANES
LEGEND
EXIST. R/W
HOV LANES
GP LANES
PROPERTY LINE
STRUCTURE
CONST ESM'T
PROPOSED R/W
PARCEL NUMBER
12
WALL
BARRIER
PROP. NOISE WALL
GRAPHIC SCALE: 1"= 150'
150
0
150
300

FIGURE A-13

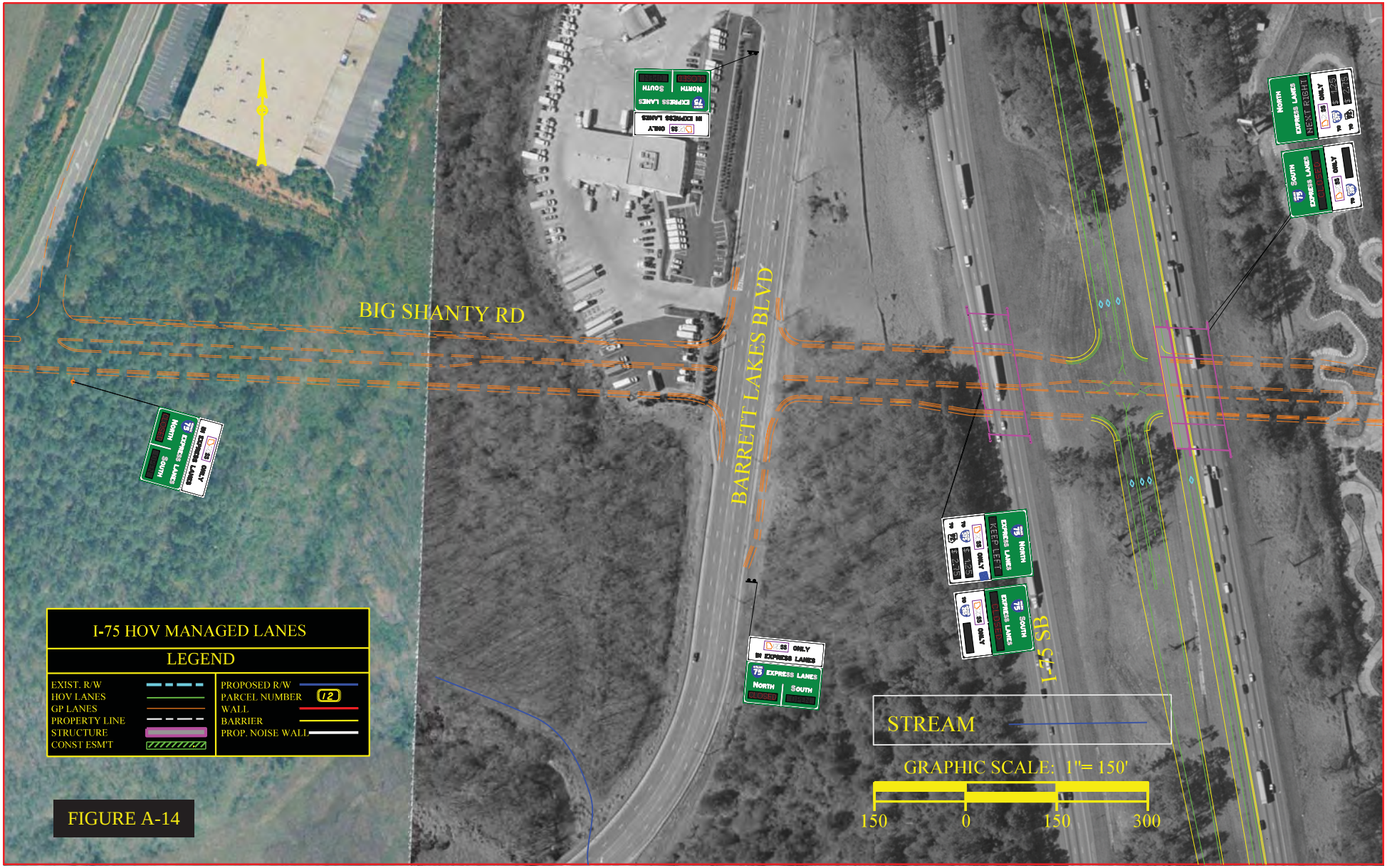

BIG SHANTY RD
BARRETT LAKES BLVD
I-75 SB
I-75 HOV MANAGED LANES
LEGEND
EXIST. R/W
HOV LANES
GP LANES
PROPERTY LINE
STRUCTURE
CONST ESM'T
PROPOSED R/W
PARCEL NUMBER
12
WALL
BARRIER
PROP. NOISE WALL
STREAM
GRAPHIC SCALE: 1"= 150'
150
0
150
300

FIGURE A-14

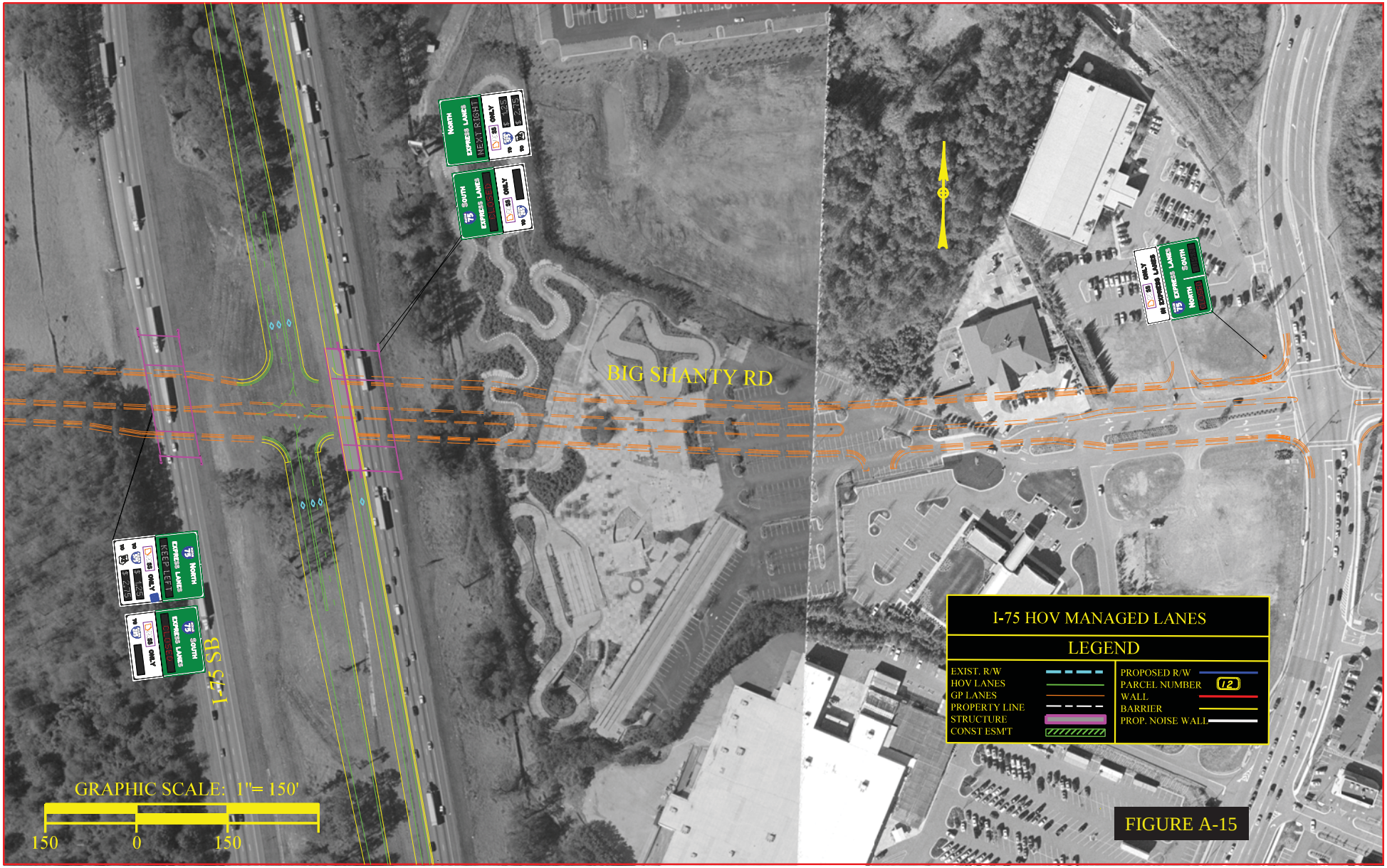

BIG SHANTY RD
I-75 SB
I-75 HOV MANAGED LANES
LEGEND
EXIST. R/W
HOV LANES
GP LANES
PROPERTY LINE
STRUCTURE
CONST ESM'T
PROPOSED R/W
PARCEL NUMBER
12
WALL
BARRIER
PROP. NOISE WALL
GRAPHIC SCALE: 1"= 150'
150
0
150

FIGURE A-15

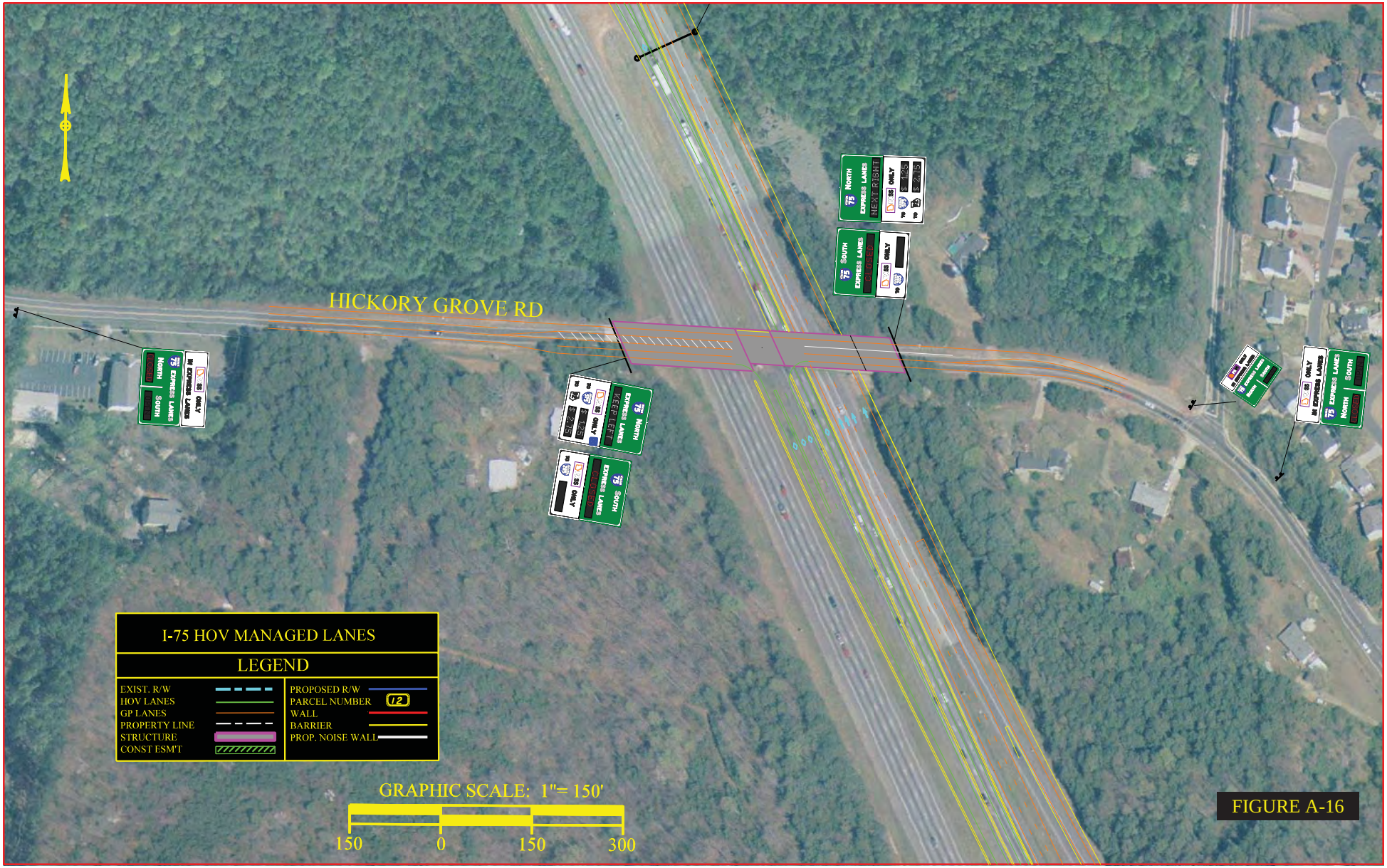
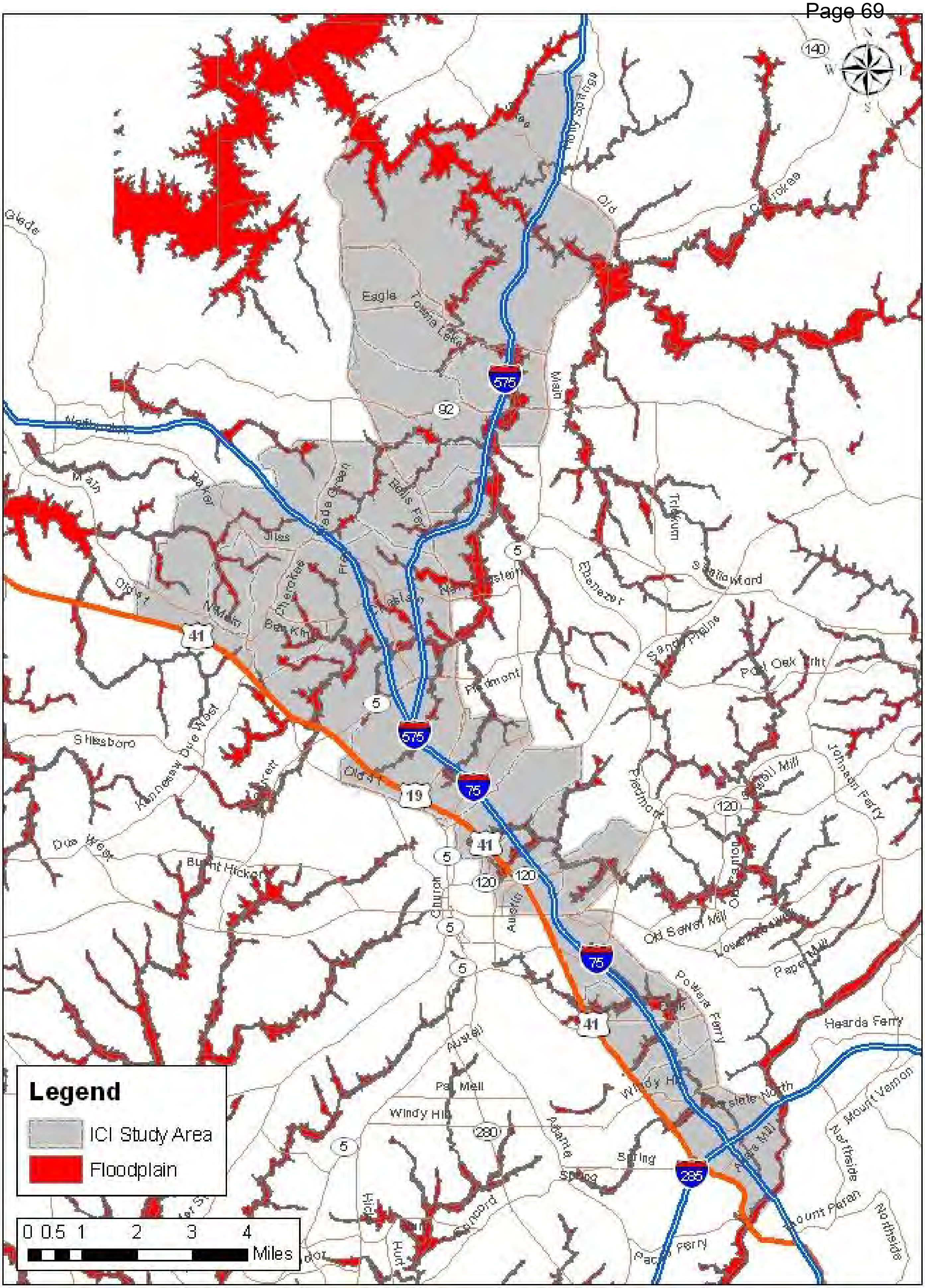

HICKORY GROVE RD
I-75 HOV MANAGED LANES
LEGEND
EXIST. R/W
HOV LANES
GP LANES
PROPERTY LINE
STRUCTURE
CONST ESM'T
PROPOSED R/W
PARCEL NUMBER
12
WALL
BARRIER
PROP. NOISE WALL
GRAPHIC SCALE: 1"= 150'
150
0
150
300

FIGURE A-16

FLOODPLAINS

EC-7, EC-8


Legend
ICI Study Area
Floodplain
0 0.5 1 2 3 4
Miles

HAZARDOUS MATERIALS

EC-20, EC-48

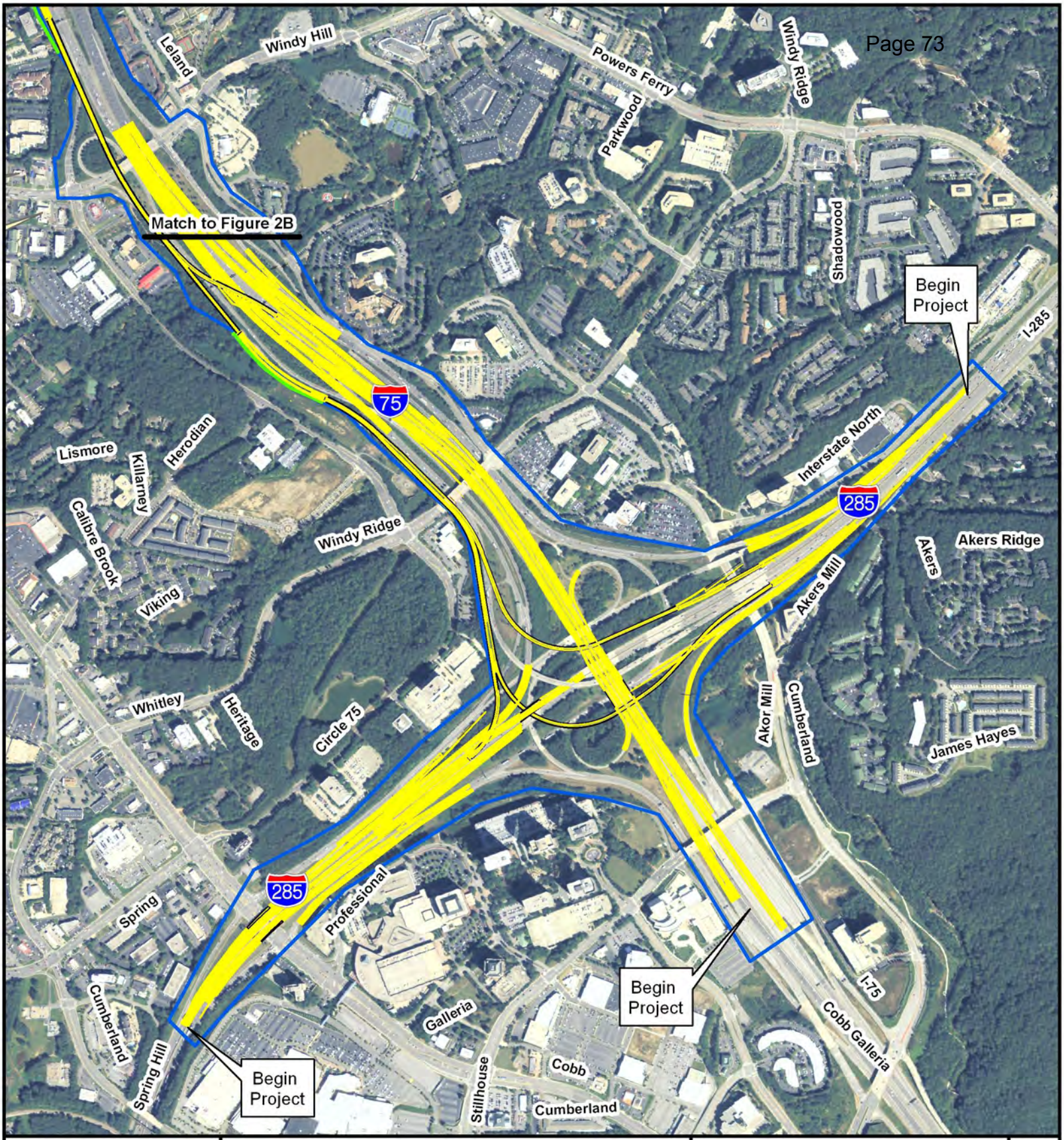


Figure 2A: Level II Contamination Assessment Map

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

0 0.25 0.5 Miles

Legend

- Construction Easement
- Alignment
- Required Right-of-Way
- Existing Right-of-Way
- Level II Contamination Sites

N

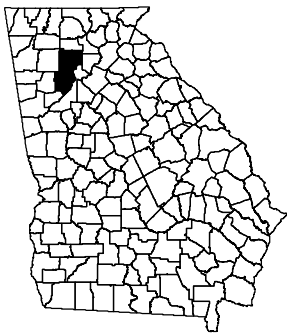


Figure 2B: Level II Contamination Assessment Map

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

0 0.25 0.5 Miles

Legend

- Construction Easement
- Required Right-of-Way
- Alignment
- Existing Right-of-Way
- Level II Contamination Sites

N

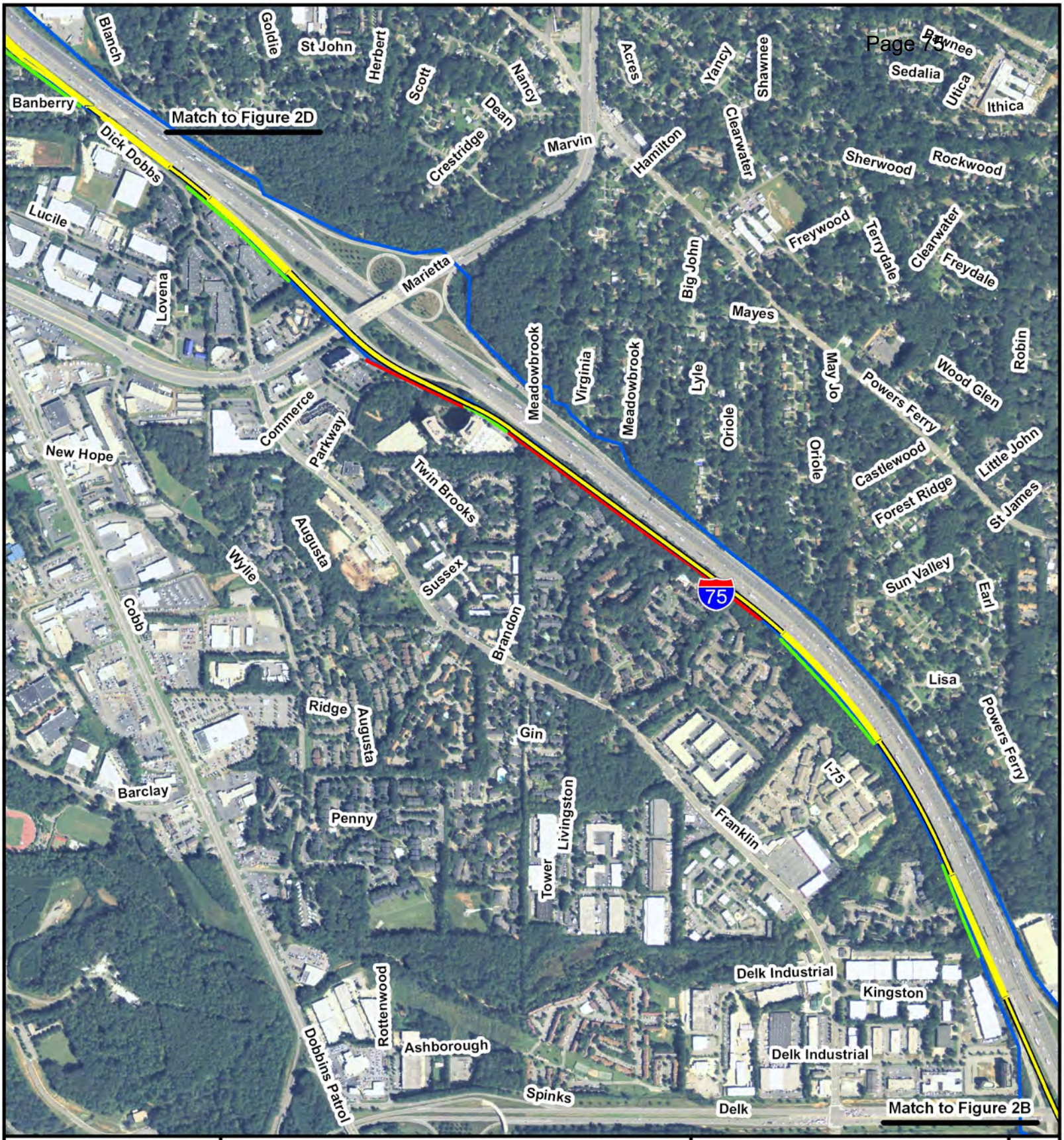


Figure 2C: Level II Contamination Assessment Map

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

0 0.25 0.5 Miles

Legend

- Construction Easement
- Alignment
- Required Right-of-Way
- Existing Right-of-Way
- Level II Contamination Sites

N

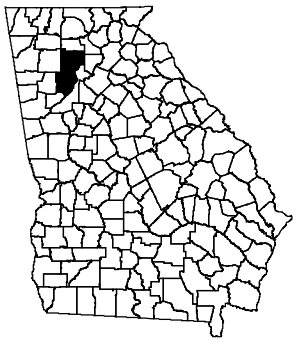


Figure 2D: Level II Contamination Assessment Map

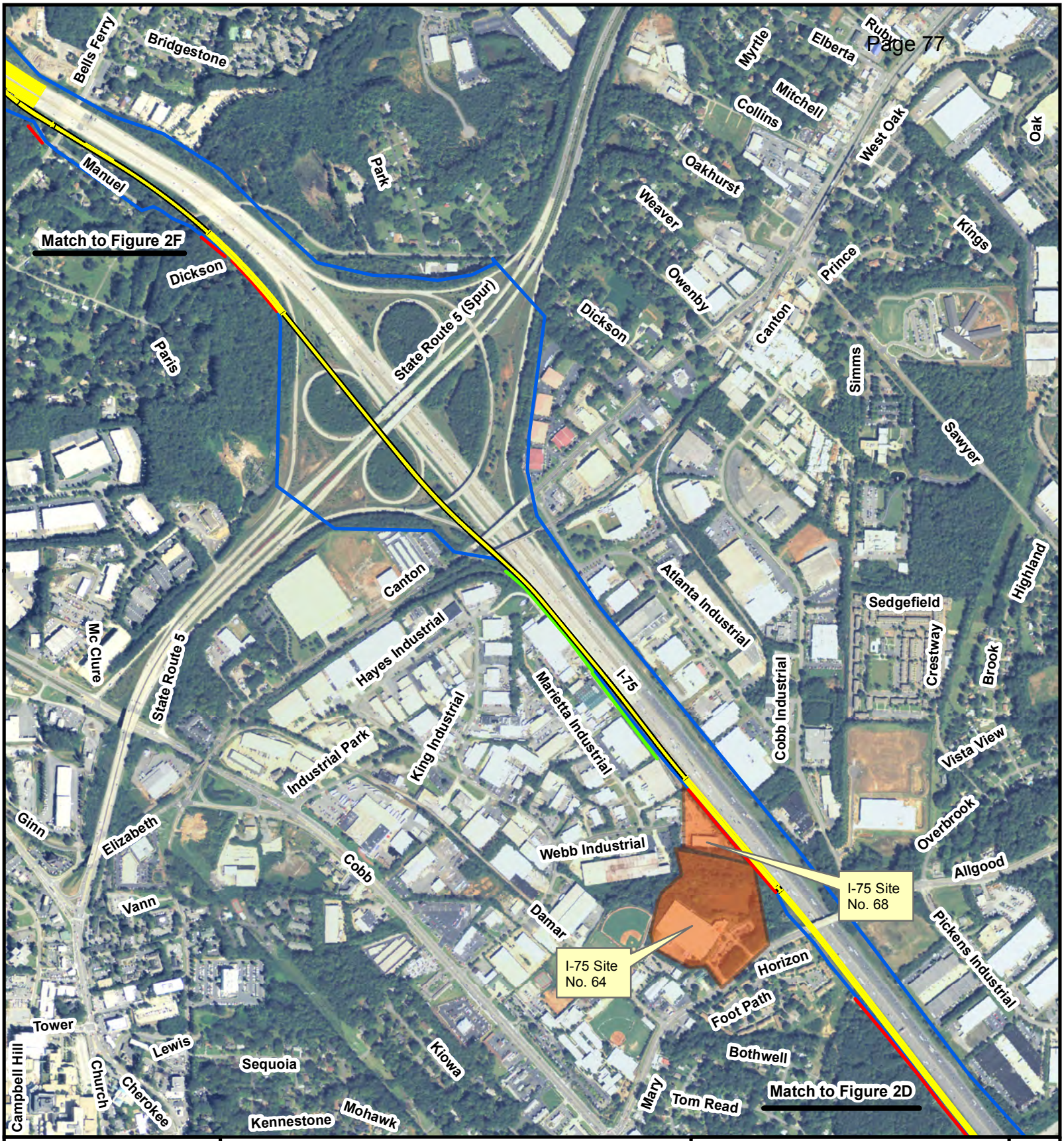
Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

0 0.25 0.5 Miles

Legend

- Construction Easement
- Alignment
- Required Right-of-Way
- Existing Right-of-Way
- Level II Contamination Sites

N



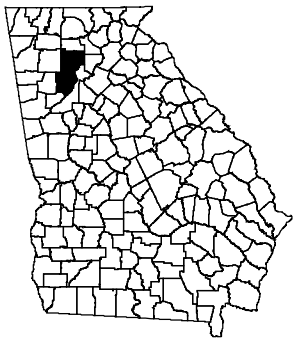


Figure 2E: Level II Contamination Assessment Map

Northwest I-75/I-575 Corridor
Project #: CSNHS-0008-00(256)
P.I. #: 0008256
Cherokee and Cobb Counties

0 0.25 0.5 Miles

Legend

- Construction Easement
- Alignment
- Required Right-of-Way
- Existing Right-of-Way
- Level II Contamination Sites

N

Appendix B Comment Letters and Responses

Summary of Comments Received on the FEIS, During Post-FEIS Outreach and on the FEIS Reevaluation

While issuance of the FEIS does not require a formal comment period under NEPA rules, FHWA's Environmental Impact and Related Procedures (23 CFR 771) calls for new substantive comments received on the FEIS to be responded to in the ROD. Substantive comments received on the FEIS, during post-FEIS outreach and on the FEIS reevaluation are summarized below, with references to the location within this Appendix where the comment and corresponding response can be found.

All comment correspondence was reviewed to determine whether it contained substantive comments. The comments in the table below were assigned to categories based on their content.

All comments received have been addressed by GDOT and did not alter FHWA's decision to proceed with the Selected Alternative.

Comments Received on the FEIS and During the 2011 Small Group Meetings for Sound Barriers

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Project Purpose and Need					
• The preferred alternative does not meet purpose and need for the project, it does not address reducing congestion, improving mobility by reducing travel time and increasing reliability, or improving connectivity between activity centers.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	11/21/11/Letter	C-15.2 C-15.3 C-15.5	B-51 B-51 B-54
• The preferred alternative fails to meet the purpose of "redu[ing] vehicle emissions by improving vehicular efficiency and increasing the proportion of high capacity vehicles." Correcting the calculation of the percentage change in air pollutant emissions between the Build and No-Build scenarios in Table 5-10, the preferred alternative would increase NOx emissions by 2.2 percent.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	11/21/11/Letter	C-15.4	B-53
Range of Alternatives					
• The alternatives analysis fails to adequately consider transit alternatives currently under NEPA review by another federal agency.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	11/21/11/Letter	C-15.7	B-58
• Section 2 of the FEIS remains insufficient in thoroughly analyzing and discussing the full range of alternatives.	Heinz J. Mueller, Chief, US Environmental Protection Agency	FHWA	11/21/11/Letter	C-1.1	B-21

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Environmental Justice					
• Specific measures for mitigating adverse impacts in environmental justice communities must be committed to and implemented.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	11/21/11/Letter	C-15.8	B-59
	Heinz J. Mueller, Chief, US Environmental Protection Agency	FHWA	11/21/11/Letter	C-1.5	B-26
Tolling and Transportation Effects					
• Concern was expressed about the recent I-85 HOV to HOT lane project, how it appeared to increase congestion, calling into question its effectiveness and questioning if the same might happen with the Northwest Corridor Project.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	11/21/11/Letter	C-15.1	B-50
	Heinz J. Mueller, Chief, US Environmental Protection Agency	FHWA	11/21/11/Letter	C-1.3 C-1.4	B-23 B-24
• It was suggested that GDOT have the P3 partners determine the financial feasibility of allowing a level of free HOV use on the facility	Jane D. Hayse, Chief, Transportation Division, Atlanta Regional Commission	GDOT	11/18/11/Letter	C-2.3	B-30
Noise Impacts					
• Concern was expressed that the construction of sound barriers might not be implemented by the P3 developer because of a lack of explicit commitment.	Heinz J. Mueller, Chief, US Environmental Protection Agency	FHWA	11/21/11/Letter	C-1.6	B-27

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Noise Impacts (con't)					
• Comments were made to reconsider installing sound barriers in several locations along I-75	Michael Wood	GDOT	11/10/11/Court Reporter	C-62.1	B-118
	Eileen Simms	GDOT	11/10/11/Court Reporter	C-63.1	B-119
	John Shearrow	GDOT	11/21/11/Project Website	C-38.1	B-91
	Carol Brown	GDOT	11/20/11/Comment Card	C-65.2	B-121
	Eileen Simms	GDOT	11/20/11/Comment Card	C-67.1	B-124
	Michael Wood	GDOT	11/20/11/Comment Card	C-69.1	B-126
• Concern was expressed about the aesthetics of the sound barriers	Rube McMullan	GDOT	11/2/11/Project Website	C-29.2	B-79
	Paul Robinson	GDOT	11/15/11/Comment Card	C-37.1	B-90
	Carol Brown	GDOT	11/20/11/Comment Card	C-65.1	B-121
• Concern was expressed about the sound barriers blocking commercial signage	Renee Harbeson/Infomart	GDOT	11/8/11/Court Reporter	C-60.1	B-116

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Air Quality					
• Modeling of MSAT concentrations should be conducted at several locations where people might be exposed. Based on these estimated concentrations, a screening level risk comparison should be developed to better inform the consideration of each alternative's potential impacts.	Heinz J. Mueller, Chief, US Environmental Protection Agency	FHWA	11/21/11/Letter	C-1.2	B-22
• Concern was expressed that the ETL policy combined with the removal of HOV lanes would discourage commuters from carpooling, which might increase air emissions. It was recommended that GDOT reconsider the policy and allow HOV 2+ to use managed lanes without paying a toll.	Heinz J. Mueller, Chief, US Environmental Protection Agency	FHWA	11/21/11/Letter	C-1.3	B-23
• Concern was expressed about the project increasing air pollution.	Rube McMullan	GDOT	11/2/11/Project Website	C-29.1	B-79
Streams					
• It was noted that Sope Creek was erroneously referred to as a tributary of Rottenwood Creek when in fact it is a direct tributary of the Chattahoochee River.	Alex Levy	GDOT	11/8/11/Project Website	C-26.1	B-76
Cumulative Effects					
• The FEIS fails to consider the cumulative impacts of the whole Atlanta Regional Managed Lane System Plan when addressing cumulative impacts of the Northwest Corridor Project. An example is the 2.2 percent increase in NOx emissions-if other managed lane projects produce a similar increase, then the increase in NOx emissions cannot reasonably be described as negligible.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	11/21/11/Letter	C-15.6	B-55
Design Considerations					
• Concern was expressed about the distance between access points on I-75 from Big Shanty Road to Roswell Road. A suggestion was made to add a managed lane exit at either Akers Mill Road or the Cobb Parkway/Galleria area and at Canton Road. A suggestion was also made that GDOT should monitor the operations and have a contingency plan in place to add or adjust the location of access points if necessary.	Jane D. Hayse, Chief, Transportation Division, Atlanta Regional Commission Stephen Kahle	GDOT GDOT	11/18/11/Letter 11/6/11/Project Website	C-2.4 C-21.1 C-21.2	B-30 B-70 B-70

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Design Considerations (con't)					
• PLAN 2040 recommends that transit access, for systems such as GRTA and Cobb County Transit (CCT), be given priority in the design and location of access points. Transit access must be a foundation of the project's final design.	Jane D. Hayse, Chief, Transportation Division, Atlanta Regional Commission	GDOT	11/18/11/Letter	C-2.1	B-29
Cost, Funding and Phasing					
• GDOT, SRTA, and FHWA should consider the costs, benefits and financial feasibility of the regional managed lane network in its entirety before pursuing this costly, ineffective and unpopular strategy.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	11/21/11/Letter	C-15.1	B-50
• Given the uncertainty surrounding the project's funding and concerns about the feasibility of the preferred alternative, a Record of Decision should not be issued until a firm financial plan for the construction and operation of the project is in place.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	11/21/11/Letter	C-15.1	B-50

Comments Received on the FEIS Reevaluation

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Tolling and Transportation Effects					
• Metro Atlanta's Managed Lane System Plan (MLSP), adopted by the Georgia State Transportation Board as the official state policy for managed lane projects in the region, concludes that HOT3+ is "the recommended eligibility policy for the managed lane system." Atlanta Regional Managed Lane System Plan, Georgia Department of Transportation (January 2010). Despite this conclusion and the emphasis on HOT3+ as the preferred tolling strategy in previous documents for the Northwest Corridor and other projects, the Final EIS and now the Reevaluation state that the preferred tolling policy will be that of express toll lanes (ETL).	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.1	B-137
• Only two brief portions of the environmental review documents for the Northwest Corridor analyze the impacts of this change in policy. The remainder of the analysis contained in the FEIS and Reevaluation is based on the continued use of HOT3 as the tolling policy. Failing to fully assess the impact of the change in tolling policy is an important shortcoming of the FEIS and Reevaluation that must be addressed before this project can move forward.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.2	B-137

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Tolling and Transportation Effects (con't)					
• The first document that addresses this change in tolling policy is the Travel Forecasting Sensitivity Analysis for Tolling contained in both the Final EIS and the Reevaluation. This sensitivity analysis compares the traffic counts for the managed lanes under ETL and HOT3 and ultimately concluded the differences to be "generally the same under both tolling policies. However, this comparison shows three consistent trends in the performance of ETL versus HOT lanes: o The ETL policy produced higher traffic volumes in the general purpose lanes; o The ETL policy produced lower traffic volumes in the tolled lanes; and o The ETL policy produced lower volumes for the road as a whole. All of the other travel forecasting and all adverse effects analysis that relies on travel forecasting (such as air quality and noise impacts) are premised on modeling that utilizes HOT3 as the tolling policy. The FEIS' approach of concluding that the travel forecasts under the two scenarios is "generally the same" so all other adverse effects under the two policies must also be "generally the same" does not constitute actual analysis and does not satisfy the requirements of NEPA.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.3	B-139

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Tolling and Transportation Effects (con't)					
• Both the traffic sensitivity analysis and the Toll Policy Memorandum conclude that the choice of tolling policy has meaningful real world differences for the project, both in terms of its transportation performance and its environmental effects. But because the traffic sensitivity analysis is extremely limited in scope and the Toll Policy Memorandum is largely qualitative in nature, they do not fully explore the implications of the tolling policy choice. Specifically, the Final EIS and the Reevaluation do not compare the relative effects of the tolling policies with respect to the following issues: o Whether utilizing an ETL tolling policy will result in higher toll prices and the potential impact on the ability of low income drivers to utilize the lanes; o Why total traffic volumes decrease under the ETL policy and whether these drivers are instead using transit, increasing congestion on adjacent roads by utilizing alternate routes, or forgoing trips altogether; o Whether the reduction in HOV formation will increase the air quality impacts of the project (including air pollutants beyond those considered as part of the conformity analysis); o Whether the increased number of drivers in the general purpose lanes under the ETL policy will increase the air quality impacts of the project (including air pollutants beyond those considered as part of the conformity analysis) due to the increased number of drivers experiencing increased congestion in the general purpose lanes;	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.4	B-140

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Tolling and Transportation Effects (con't)					
o The environmental justice implications of increasing the level of service discrepancy between the general purpose lanes and the managed lanes; if low income drivers are less likely to utilize the managed lanes; o Whether the reduced HOV formation will disproportionately occur among lower income drivers and whether this will further prevent low income drivers from receiving the benefits of the managed lanes at the same rate as higher income drivers.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.4	B-140
• The implications of utilizing an ETL policy instead of a HOT3 policy must be comprehensively evaluated and addressed with respect to each of these issues before completing the environmental review for the project.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.5	B-142
Environmental Justice					
• The primary putative benefit of the Northwest Corridor project is that it offers improved travel conditions compared to the untolled, general purpose lanes. Thus, the environmental justice analysis for this project must not only examine whether minority and low income communities will disproportionately suffer the project's impacts, but also whether those communities will receive less of the project's benefits. The Reevaluation's environmental justice analysis falls short in this regard.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.6	B-144

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Environmental Justice (con't)					
• Based on the modeling, transponder studies and public opinion information, the Reevaluation concludes that "there does not appear to be a strong relationship between the percent of low-income households and NWC Managed Lane usage." The Reevaluation fails to examine actual data on managed lane usage, either in metro Atlanta or elsewhere in the country. Academic analysis of driver data from other managed lane projects has shown that drivers of all income levels utilize the lanes but higher income drivers use the lanes with greater frequency than low income drivers. The Reevaluation cannot rely on environmental justice modeling, opinion polls and transponder subscriptions when research on actual usage directly contradicts their conclusions. …As of the date of this letter, over eighteen months worth of trip data is available for the I-85 HOT lanes which could be analyzed to determine actual usage patterns and to validate the accuracy of the ARC modeling in predicting managed lane usage in the area. … Not only does the necessary data exist to examine actual travel patterns, but the analysis should have already been conducted as part of the I-85 project. Given the shortcomings of the analysis tools used in the Reevaluation, the contradiction between their results and studies from elsewhere, and the viability of testing that analysis with real world data in Atlanta, the Reevaluation's environmental justice analysis is inadequate to support a Record of Decision.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.7	B-144

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Environmental Justice (con't)					
• The purpose of the managed lanes is to improve travel conditions in those particular lanes, not to improve conditions in the untolled, general purpose lanes. The Reevaluation's modeling shows this proposition holds true for the Northwest Corridor project… In fact, the Reevaluation shows that the discrepancy in traffic conditions will be even greater than projected in the FEIS…In light of research showing that low income drivers use optional toll lanes less frequently than higher income drivers and the project's improvement of travel conditions in the managed lanes but not the general purpose lanes, a hard look must be given to whether this project has adverse effects by reducing the benefits received by low income drivers.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.8	B-147

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Environmental Justice (con't)					
• The Reevaluation identifies two mitigation strategies that will be used to mitigate for the adverse effects of the tolling policy on low income communities…Neither of these mitigation measures addresses the actual nature of the adverse impact: lower income drivers cannot afford to use the managed lanes as often as the higher income drivers. In contrast, the following five mitigation strategies would address the adverse effect of low income drivers decreased ability to utilize the managed lanes and the benefits that come with it…Any Record of Decision for this project must examine each of these potential mitigation measures and either commit to their implementation or explain why they will not be implemented. o Utilize a HOT Tolling Policy o Subsidize Transit Use in the Corridor o Dedicate Any Excess Toll Revenue Estimates to the Corridor o Subsidize A Minimum Level of Managed Lane Access o Set A Per Mile Toll Cap	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.9	B-148
• A more robust analysis of the Northwest Corridor's adverse effects on low income drivers, including a hard look at the actual usage data and a discussion of all feasible mitigation strategies, must be performed before the project's environmental review can be completed.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.10	B-154

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
Cumulative Impacts					
• Previous comments submitted regarding this project, including on the FEIS and Draft Supplemental EIS, have raised concerns about the adequacy of the cumulative and indirect effects assessment for this project. There are numerous managed lanes projects in metro Atlanta's current Transportation Improvement Program and many more in the region's long term Regional Transportation Plan. A number of specific areas have been identified where these projects, when operating in conjunction, are likely to have cumulative or indirect effects including transportation performance, air pollutants other than ozone and fine particulate matter, environmental justice and financing. However, these comments have been dismissed by pointing to consideration of these issues elsewhere, primarily in the Managed Lane System Plan or the region's conformity determination. These responses are insufficient. The cursory analysis contained in the MLSP may be sufficient to identify issues but falls well short of the "hard look" NEPA requires for a project's cumulative and indirect effects. A more comprehensive analysis of the cumulative and indirect effects of the planned managed lane projects, including the Northwest Corridor project, is required on at least the following issues: air quality impacts including air pollutants other than ozone and PM2.5, environmental justice effects on low income communities, traffic effects (such as where the managed lane projects connect or merge into general purpose lanes) and the degree to which toll backed financing for multiple managed lane projects poses a financial risk to Georgia's finances. With respect to the air quality issues, previous responses to comments have asserted that the cumulative and indirect air quality effects have been considered as part of the region's conformity determination. This argument fails for several reasons. …It is impossible to determine the amount of air	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.11	B-156

Comment	Author(s)	Recipient	Date/Type of Correspondence	Comment and Response Number	Page Number
pollution that is attributable to the cumulative effects of the managed lane projects versus all of the other projects in the TIP….the conformity analysis only addresses ozone and fine particulate matter, so the cumulative and indirect effects for all other air pollutants (greenhouse gases, carbon monoxide, mobile source air toxics) are not considered. The conformity determination is not, and was never intended to be, an adequate proxy for cumulative impacts analysis under NEPA. A more robust analysis of the Northwest Corridor's cumulative and indirect effects must be performed before the project's environmental review can be complete.					
Greenhouse Gas Emissions					
• Although the Reevaluation contains a section focused on the GHG emissions from the project, its analysis is superficial and focuses far more on global, national, and statewide emissions than on the effects of the Northwest Corridor project. The Air Quality Technical Report contains the same minimal amount of information as the Reevaluation, only adding a section on "Mitigation for Global GHG Emissions" and "Local and State Measures to Reduce GHG Emissions." This cursory approach falls well short of best practices for considering the GHG effects of transportation projects. In 2010, the Council on Environmental Quality issued preliminary draft guidance instructing agencies on how to consider GHG emissions in various contexts. The Reevaluation does not appear to have performed any of this recommended analysis.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.12	B-165

Greenhouse Gas Emissions (con't)					
• A better example of GHG analysis for transportation projects is the Final Environmental Impact Statement for the Columbia River Crossing. The CRC FEIS differs from the Northwest Corridor Reevaluation by taking a detailed and comprehensive approach to explaining, analyzing and summarizing all of the project's GHG effects. The Reevaluation's consideration of GHG emissions should be supplemented to include a more detailed and comprehensive analysis quantifying the amount of short and long term GHG emissions, comparing the relative emissions of the various proposed alternatives, and examining emission reduction strategies.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.13	B167
Design Considerations					
• Concern was expressed about the closing of Chert Road.	Jim Lassiter	GDOT	3/26/13/Email	C-82.1	B-172
Response to Public Comments					
• CEQ regulations require an agency to provide appropriate responses to comments raised by the public. Courts have reasoned that these responses must accurately reflect the comments and provide a substantive and meaningful response. Agency responses to previous public comments on the Northwest Corridor have fallen short of this standard, often inaccurately summarizing comments or ignoring significant information submitted herein and provide accurate and meaningful responses to these comments.	Brian L. Gist, Senior Attorney, Southern Environmental Law Center	FHWA, GDOT	04/05/13/Letter via Email	C-77.14	B-167
Right-of-Way Impacts					
• Concern was expressed about impacts to Gospel Light Community Church.	Betty Hunter	FHWA	3/26/13/Email	C-80.1	B-170
Land Use					
• Is increased commercialism expected in the area around Chert Road?	Luther LeCroy	GDOT	03/21/13/Project Website	C-83.3	B-174

COMMENTS AND RESPONSES

FEIS

COMMENT C-1

RESPONSE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

November 21, 2011

Rodney N. Barry, P.E.
Division Administrator
Federal Highway Administration
Georgia Division
61 Forsyth Street, SW
Suite 17T100
Atlanta, Georgia 30303-3104

SUBJECT: Final Environmental Impact Statement/Alternatives Analysis for the Northwest I-75/I-575 Corridor Project in Cobb and Cherokee Counties, Georgia

Dear Mr. Barry:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (FEIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The Georgia Department of Transportation (GDOT) and the Federal Highway Administration (FHWA) propose to make transportation improvements to I-75 and I-575 in the northwest corridor in the Atlanta metropolitan area in Cobb and Cherokee Counties, Georgia. The proposed managed lanes would extend from the current end of the high-occupancy vehicle (HOV) lanes on I-75 at Akers Mill Road south of I-285. Two new reversible managed lanes would be constructed between I-285 and I-575. A single reversible lane would be constructed on I-75 from I-75/I-575 Interchange to north of Hickory Grove Road. Similarly, a single reversible lane would be constructed on I-575 between the I-75/I-575 Interchange and Sixes Road. The total length of highway corridor improvements is 29.7 miles.

The alternatives considered included the no-build alternative; an HOV/Truck-Only-Lane (TOL) alternative; an HOV/TOL/Transportation System Management alternative; an HOV/TOL/Bus Rapid Transit (BRT) alternative; and an HOV/TOL/Reduced BRT alternative. All build alternatives provide for the extension of the HOV lanes on I-75 and I-575 and the addition of TOL on I-75. In addition to the design options, two operational options were considered for the build alternatives, which include High-Occupancy-Toll Lane (HOT) Option that would allow single-occupancy vehicles use of the HOV lanes by paying a toll and Truck-Only-Toll Lane (TOT) Option that would require truck operators to pay a toll (either mandatorily or voluntarily).

In 2008, GDOT decided to eliminate the TOL and the BRT elements of the build alternatives evaluated in the DEIS, leaving only the HOV lane element of the project and opted to analyze three concepts in the FEIS. Concept A, which is a two lane bi-directional HOV

This space is intentionally blank.

COMMENT C-1 (con't)

system operating on I-75 between I-285 and I-575, and a single bi-directional HOV system northwards to Hickory Grove Road on I-75 and Sixes Road on I-575. Concept B consisting of two reversible (one-direction) lanes operating on I-75 between I-285 and I-575, and single reversible lanes northwards to Hickory Grove Road on I-75 and Sixes Road on I-575. Concept C consisting of three reversible lanes operating on I-75 between I-285 and I-575, two reversible lanes both I-75 and I-575 north to Big Shanty road, and a single reversible lane further north of Hickory Grove Road on I-75 and Sixes Road on I-575.

Concept A was eliminated from further consideration because bi-directional lanes would result in unused capacity in the off-peak direction flow. Concept C was eliminated because of the additional cost of constructing a third lane on I-75 between I-285 and I-575. GDOT concluded that both Concept A and C had higher environmental impacts as compared to B. GDOT identified Concept B as the most appropriate design concept in order to meet the cost effectiveness and affordability goal of the study.

Preferred Alternative, Concept B, includes all proposed transportation facilities and services considered part of the No-Build Alternative, plus the additional proposed improvements for both I-75 and I-575. The Preferred Alternative would extend the two I-75 managed lanes (HOV lanes, one in each direction) that currently terminate at Akers Mill Road south of the I-75/I-575 interchange. The two new managed lanes would extend north on I-75 from the I-75/I-575 interchange to just beyond Hickory Grove Road. Similarly, a single managed lane would continue north on I-575 interchange. A single managed lane would continue north on I-75 from the I-75/I-575 interchange to just beyond Hickory Grove interchange to the Sixes Road interchange. The proposed managed-lane facility includes improvements of approximately 16.8 miles on I-75, 11.3 miles on I-575, and 1.0 miles on I-285. The proposed 29.7 miles of new managed lanes would be designed for highway speeds of 55 miles per hour (mph) on I-75 between I-285 and I-575 and 65 mph on each corridor north of the I-75/I-575 interchange. The ramps connecting the I-75 managed lanes to I-285 would be designed for 45 mph.

Based on our review of the FEIS, EPA's environmental concern were related to the following areas: the full consideration of alternatives, air impacts (air emissions and lack of analysis for mobile source air toxics (MSATs)), environmental justice and noise impacts.

Range of Alternatives:

C-1.1 ▶ EPA previously commented on this project's Draft Environmental Impact Statement (DEIS) on August 13, 2007. As previously stated in our DEIS letter, EPA remains concerned that that a full analysis of alternatives (in Section 2) was not conducted. The Light Rail Transit alternative was eliminated early on from further consideration by the Northwest Connectivity Study based on cost and cost effectiveness criteria. EPA requested further alternatives analysis in the FEIS, but Section 2 remains insufficient in thoroughly analyzing and discussing the full range of alternatives. As previously stated, rail transit services to Cobb and Cherokee Counties would be inherently cleaner, alleviate congestion along the I-75 corridor and serve to reduce air toxic emissions from cars and trucks.

2

RESPONSE

C-1.1

GDOT, the Georgia Regional Transportation Authority (GRTA), and FHWA have expended considerable effort to systematically evaluate all reasonable concepts. Chapter 2 of the FEIS summarizes the various alternatives that were considered. The range of alternatives included freeway alternatives, transit alternatives, transportation system management improvements, HOV lanes with and without BRT services, HOT lanes, elevated HOT lanes in the median of I-75, reversible HOV lanes, conversion of existing general-purpose lanes to HOV lanes and travel demand management strategies.

BRT was not included in the Preferred Alternative because funding sources could not be identified. In fact, the analysis required by the Federal Transit Administration demonstrated that the BRT did not meet its criteria for federal funding. Nevertheless, transit vehicles will be permitted to use the reversible lanes at no cost, and will therefore benefit from the improved mobility the managed lanes will provide. This should encourage greater use of transit. The FEIS identified an alternative that leaves the option for a light rail system on US 41 intact. There are no elements of the proposed managed lane system that would conflict with this approach. In August 2011, Cobb County initiated an Alternatives Analysis/Feasibility Study (AA) to evaluate enhanced transit in the US 41/I-75 corridor. Cobb County considers the Northwest Corridor Project to be a complimentary, not competing, project to transit in the corridor. GDOT is working closely with Cobb County as it moves forward with its AA.

The Preferred Alternative also left open the option to place a rail system on the east side of I-75. The configuration of the Preferred Alternative does not eliminate this possibility since no work is proposed on that side of I-75.

COMMENT C-1 (con't)

In light of this, EPA continues to recommend consideration for design of the preferred alternative to allow for upgrade to rail modes in the future when air quality considerations, energy costs, capacity needs, etc, warrant it.

Air Impacts:

EPA provided extensive MSATs comments in our DEIS letter for this project. The sponsors acknowledge that the project falls within the Tier 3 category established by the Federal Highway Administration (FHWA), i.e., projects with a high potential for mobile source air toxic effects in a populated area. Projects in this category should be rigorously and quantitatively assessed to compare alternatives as noted in the "Interim Guidance on Air Toxic Analysis in NEPA Documents" issued by the FHWA in 2006.

The limited air toxics analysis that has been done for this project led the sponsors to acknowledge, "that the alternatives could increase exposure to MSAT (mobile source air toxic) emissions in certain locations, although the concentrations and duration of exposures are uncertain." This is important since air toxics are a local concern and their concentrations can vary significantly over short distances. For this reason, we have called for modeling of concentrations at several locations where people might be exposed. Based on these estimated concentrations, a screening level risk comparison should be developed to better inform the consideration of each alternative's potential impacts.

C-1.2 ▶

GDOT and FHWA propose instituting an Express Toll Lane (ETL) policy where the new managed lanes will require all HOV (except certain exempted vehicles) to pay a toll. EPA is concerned that the ETL policy combined with the removal of HOV lanes will discourage commuters from carpooling, which might increase air emissions. For example, the recent I-85 HOV to HOT lane project appears to have increased congestion and the effectiveness of the project is in question. EPA encourages GDOT to continue to monitor the effectiveness of the I-85 HOV to HOT lane project and apply appropriate lessons learned to the Northwest Corridor Project. EPA also encourages GDOT and FHWA to exam the air emission impact of this option. Further, EPA recommends that GDOT re-consider this strategy and allow HOV 2+ to use the managed lanes without paying a toll.

C-1.3 ▶

C-1.4 ▶

Environmental Justice:

We appreciate GDOT's efforts in outlining possible mitigation tolling measures for Environmental Justice (EJ) communities (Environmental Commitments Table No. 14, Volume 1a). We also recognize that the Preferred Alternative requires much less direct impacts to EJ communities as compared to other alternatives listed in the DEIS. However, EPA remains concerned that EJ communities will be disproportionally impacted by this project. GDOT states that the Preferred Alternative would require the acquisition of 44 parcels of land that consist of 58% low income or minority communities (page 5-30, 5.6.2.2 Property Acquisitions, Volume 1a). Most of these purchases would not require displacement; however, all the displacements

1

RESPONSE

C-1.2

The Mobile Source Air Toxics (MSAT) analysis for the NWCP followed the 2009 FHWA *Interim Guidance Update on Air Toxic Analysis in NEPA Documents*. Based on FHWA's recommended tiering approach, the project falls within the Tier 3 approach used for project with a high potential for MSAT effects. In accordance with FHWA's recommendation, the Easy Mobile Inventory Tool (EMIT) was used to calculate annual MSAT pollutant burdens in tons per year. Future calculated MSAT emission burdens are predicted to decrease compared to the existing condition scenario. It is projected that there would be no measurable changes in MSAT emissions in the immediate area of the Northwest Corridor Project under the Preferred Alternative relative to the No-Build Alternative.

There is a lack of a national consensus on an acceptable level of risk with regards to MSATs. The current context is the process used by the EPA as provided by the Clean Air Act to determine whether more stringent controls are required in order to provide an ample margin of safety to protect public health or to prevent an adverse environmental effect. The decision framework is a two-step process. The first step requires EPA to determine a "safe" or "acceptable" level of risk due to emissions from a source. Information is incomplete or unavailable to establish that even the largest of highway projects would result in levels of risk greater than safe or acceptable.

Furthermore, at this time, available technical tools do not enable prediction of the project-specific health impacts of the emission changes associated with the alternatives. Because of the limitations in the methodologies for forecasting health impacts, any predicted difference in health impacts between alternatives is likely to be much smaller than the uncertainties associated with predicting the impacts. Consequently, the results of such assessments would not be useful to decision makers. The decision makers would need to weigh the information against project benefits, such as reducing traffic congestion, accident rates, and fatalities plus improved access for emergency response, that are better suited for quantitative analysis.

COMMENT C-1 (con't)

(six residences and 12 businesses) consist of low income or minority people. As requested in our
C-1.5 ▶ DEIS comment letter, EPA continues to request that GDOT mitigate for these adverse community impacts. EPA strongly recommends development of a comprehensive mitigation and enhancement plan for these neighborhoods to address displacement concerns and preserve the cohesiveness of these communities. EPA recommends that the plan include commitments to continue working with these communities to assist with relocation and redevelopment activities. The plan should also identify the extent to which toll revenues and toll discounts will be used to improve mobility and equity for disadvantaged populations.

Noise Impacts:

The FEIS indicates that the Preferred Alternative will impact 1,977 receptors along I-75 and 158 receptors along I-575. GDOT and FHWA propose constructing sound barriers along I-75 at a cost of $20.7 Million and along I-575 at a cost of $13 Million. Additionally, GDOT proposes in the FEIS to have the Public Private Partnership (P3) pay for the cost of these sound barriers, but this is not specifically listed in the Environmental Commitments table (Page EC-3). Environmental Commitment No. 10 (Page EC-3, Volume 1a) states, "A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final decision and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers. Public involvement will be conducted in accordance with the approved public involvement plan for the project." EPA acknowledges GDOT's efforts in coordinating and outreaching to impacted communities; however, EPA is concerned that the construction of appropriate sound barriers might not be
C-1.6 ▶ implemented by the P3 because of a lack of explicit commitment. EPA recommends that GDOT further strengthen their commitment to the impacted communities by clearly stating that coordination with the community and impacted property owners will continue and specific commitments to construct sound barriers to mitigate for noise will be included in the Record of Decision (ROD). Additionally, EPA requests a copy of the ROD.

We appreciate the opportunity to review the proposed action. Please contact Jamie Higgins at (404) 562-9681 if you want to discuss our comments.

Sincerely,

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: Glenn Bowman – Georgia Department of Transportation

4

RESPONSE

Finally, on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide MSAT levels to be substantially lower than today. Please see Table 5-11 in the FEIS.

We do need to acknowledge a mistake found in Table 5-10 Regional Emission Assessment in the FEIS. It incorrectly lists the tons per day of NOx for the Preferred Alternative as 47.59 tons per day in 2035. The correct amount should be 46.59 tons per day. The percent change from the No Build of 0.32% is correct as shown in the table.

C-1.3

The Project does not remove existing HOV lanes. Instead it adds additional lanes to I-75 and I-575. Two new lanes would be added to I-75 between I-285 and I-575. One new lane would be added to I-75 between I-575 and north of Hickory Grove Road, and one new lane would be added to I-575 between I-75 and Sixes Road. The project does not remove or convert any of the existing lanes on I-75 or I-575. The reversible feature would help minimize traffic congestion in the direction with the most demand, e.g. southbound in the morning commute period and northbound in the afternoon commute period.

If vehicles with as few as two occupants were allowed to use the managed lanes for free, the travel demand modeling indicated that the lanes would become congested, and there would not be a way to manage the flow. Transit vehicles would again be forced to travel in congested lanes.

As shown in Table 5-10 of the FEIS, the Preferred Alternative is expected to increase average daily VMT by 0.26 percent and increase regional pollutant emissions by 0.0 to 0.3 percent compared to the No-Build. These differences would result in no measurable impact on regional pollutant burdens. As such, the Preferred Alternative is predicted to have a minimal effect on regional pollutant burden levels.

The current Northwest Corridor Project is included in ARC's *PLAN 2040* RTP (ARC, 2011b) and FY 2012-2017 TIP (ARC, 2011c), which were adopted

COMMENT C-1 (con't)	RESPONSE
This space is intentionally blank.	by the ARC board on July 27, 2011. The *PLAN 2040* RTP and the FY 2012-2017 TIP were approved by the Georgia Regional Transportation Authority on August 18, 2011 and the FHWA issued a conformity determination on September 6, 2011.As such, the Northwest Corridor Project is part of a conforming RTP and TIP. The Northwest Corridor Project also was included in the positive conformity determination for Amendment 10 of the *Envision6* RTP. The Project was modeled for the FEIS using the HOT3+ policy that was recommended in the *Atlanta Regional Managed Lanes System Plan*. The number of vehicles traveling in the project corridor was then compared for the HOT3+ and the selected ETL tolling policies. It was found that in the design year of 2035 the mainline segment volumes in the peak direction / peak periods were within 5 percent of one another (Table 4-1, FEIS). This result was checked using the PLAN 2040 model and the number of vehicles was again found to be similar when HOT3+ was compared to ETL. The majority of the mainline segment volumes were within 5 percent of one another. All but one of the mainline segment volumes were within 7 percent of one another. The one exception was within 8 percent of one another. C-1.4 While both the Northwest Corridor Project (NWCP) and the I-85 Express Lanes from Chamblee-Tucker Road in DeKalb County to Old Peachtree Road in Gwinnett County are intended to provide increased mobility and traffic relief in two of the region's most congested corridors, the scope and operation of the two projects vary greatly. The I-85 project converted the existing High Occupancy Vehicle (HOV) lanes, one in each direction, into High Occupancy Toll (HOT) lanes. Vehicles with three or more riders can access the lanes for free; vehicles with one or two riders can access the Express Lanes for a fee. To use the I-85 Express Lanes, motorists must register for a Peach Pass account and obtain a transponder. Users may switch between a toll and a toll-free status, depending on their vehicle's occupancy, prior to their use of the lanes. Some of the key differences between the I-85 project and the NWCP

COMMENT C-1 (con't)	RESPONSE
This space is intentionally blank.	include: • NWCP adds additional lanes to I-75 and I-575. Two new lanes would be added to I-75 between I-285 and I-575. One new lane would be added to I-75 between I-575 and north of Hickory Grove Road, and one new lane would be added to I-575 between I-75 and Sixes Road. The project does not convert or change any of the existing lanes on I-75 or I-575. The reversible feature would help minimize traffic congestion in the direction with the most demand, e.g. southbound in the morning commute period and northbound in the afternoon commute period. • NWCP utilizes dedicated entrance and exit points on I-75. Six new managed lane interchanges are proposed on I-75. This would provide system-only access to and from the managed lanes to local streets, eliminating the need to cross over multiple lanes of traffic to enter or exit the system. The access locations would be separate from the general purpose interchanges. For I-575, users will continue to use the existing interchanges to enter and exit I-575, and access the managed lanes through three new pairs of slip ramps. • NWCP is barrier separated. The managed lanes system is separate from the existing I-75 and I-575 facilities, allowing enforcement of proper use of the lanes and management of incidents such as traffic accidents and vehicle breakdowns. • NWCP will toll all users. All motorists, regardless of how many passengers are in the car would be charged the same toll rate (excluding registered transit vehicles, military vehicles, emergency vehicles and school buses). Motorcycles must pay the toll to use the NWCP. • NWCP is a Public Private Partnership (P3) project. Final design and construction of the project will be conducted with private industry partners, which will greatly expand the options for innovative technology and funding. Tolls for the Northwest Corridor Project will be collected electronically and toll amounts will vary by time of day and congestion level. Users will have the opportunity to pay by transponder or by license plate. Registration for a Peach Pass account will not be required, though existing Peach Pass account

COMMENT C-1 (con't)	RESPONSE
This space is intentionally blank.	holders will be able to utilize their transponders to access the facility. C-1.5 The alignment of the Preferred Alternative, the majority of which is located within existing right-of-way, resulted from minimizing overall impacts throughout the length of the project. The number of impacts to a range of resources, including environmental justice communities, would have been higher had the managed lanes been located on the east side of I-75. While all 12 business displacements and five of the six residential displacements would occur in areas identified as low-income and/or minority, the displacements would not impact community cohesiveness and no communities are fragmented by the Project. The following figure has been provided to show the relocations in the context of the roadway improvements and the surrounding community. Property acquisitions will be conducted in compliance with the Uniform Relocation Assistance and Real Property Policies Act of 1970, as amended, and the Georgia Relocation Assistance and Land Acquisition Policy Act. A relocation specialist assigned to the project will contact each property owner, resident or business to be relocated to determine individual needs and desires. The specialist will provide information, answer questions and assist in finding replacement property. Some residential relocations might require the use of Last Resort Housing procedures. When Last Resort Housing becomes necessary, supplemental payments or other housing options will be implemented. An environmental mitigation plan is under development for the entire project and will include public outreach. Mitigation measures specific to EJ include a requirement for the State Road and Tollway Authority (SRTA) to provide a payment mechanism for persons who do not have a credit card via cash accounts or pre-paid accounts at walk-in customer service centers and/or retail outlets and a requirement that GDOT conduct annual studies that monitor the system for potential impacts to environmental justice populations and provide opportunities for the public to submit feedback on system operations and customer satisfaction for a period of three years from project opening. The environmental mitigation plan will be attached to the Record of Decision. The Record of Decision will be provided to EPA when available.

COMMENT C-1 (con't)

This space is intentionally blank.

RESPONSE

Locations of Potential Business and Residential Displacements in EJ Areas

Note: The dots in the figure above indicate the locations of anticipated business displacements. The triangles indicate the locations of anticipated residential displacements.

C-1.6

As mentioned in your letter, Environmental Commitment No. 10 (EC 10) states "A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers. Public involvement will be conducted in accordance with the approved public involvement plan for the project." This statement is from GDOT's approved noise policy. In addition, EC 10 lists GDOT and the P3 Developer as the responsible parties. The P3 Developer will be responsible for complying with the environmental commitments listed in the environmental commitment table, which will also be incorporated in the ROD. The P3 Developer will be responsible for the design and construction of all noise mitigation measures to minimize construction noise and long-term impacts of the facility as required in GDOT's *Highway Noise Abatement Policy for Federal Aid Projects*. GDOT will be responsible for the

COMMENT C-1 (con't)	RESPONSE
	maintenance of all noise mitigation measures.

This space is intentionally blank.

COMMENT C-2

RESPONSE

ATLANTA REGIONAL COMMISSION

November 18, 2011

PLANNING • LEADERSHIP • RESULTS

RECEIVED
NOV 21 2011
OFFICE OF
INNOVATIVE PROGRAM DELIVERY

Mr. Darryl D. VanMeter, P.E.
Office of Innovative Program Delivery
Georgia Department of Transportation
600 West Peachtree Street, NW
19th Floor
Atlanta, GA 30308

RE: Comments on Northwest Corridor Project Cobb and Cherokee Counties, Georgia Final Environmental Impact Statement

Dear Mr. VanMeter,

ARC commends the Georgia Department of Transportation (GDOT) in reaching a critical milestone for the Northwest Corridor Project (NWCP) with the preparation of the Final Environmental Impact Statement (FEIS). The culmination of years of hard work, GDOT's effort to implement mobility improvements in this critical travel corridor is essential to our region's future.

ARC offers the following comments on the FEIS. These comments are offered to assist the Department as the project moves toward the final stages of implementation:

C-2.1 ▶

- The NWCP is Consistent with the Regional Transportation Plan - ARC has fully incorporated the NWCP in the PLAN 2040 Regional Transportation Plan (RTP), adopted in July 2011. Federal and state partners have reviewed the technical analysis supporting the region's Conformity Determination to ensure that the project is accurately reflected in the travel demand model. A 151-mile regional managed lanes network, a foundation of PLAN 2040, is included in the financially constrained RTP. Other associated corridor projects are included in PLAN 2040, including $147 million of roadway and interchange improvements along this segment of I-75 between I-285 and Delk Road. ARC applauds the provision in Section 2.3.2 stating that transit vehicles are permitted to use the reversible lanes at no cost. PLAN 2040 recommends that transit access, for systems such as GRTA and CCT, be given priority in the design and location of access points. Transit access must be a foundation of the project's final design.

C-2.2 ▶

- The Transportation Investment Act (TIA) Final Project List Includes Beneficial Projects Impacting the NWCP – The TIA Final Project List includes funding for several critical corridor projects. Subject to a region-wide vote in July 2012, potential funding is included for interstate interchange improvements at Windy Hill/I-75 and Enhanced Premium Transit Service from Acworth / Kennesaw / Town Center to MARTA Arts Center Station. The Windy Hill/I-75 interchange addresses one of Georgia's most

40 COURTLAND STREET, NE, ATLANTA, GEORGIA 30303 404.463.3100 FAX 404.463.3105 WWW.ATLANTAREGIONAL.COM

C-2.1
GDOT has coordinated with GRTA and Cobb County and will continue to coordinate throughout the development of the project.

The northern terminus of the proposed managed lanes on I-75 is south of SR 92. Transit vehicles coming from the existing Acworth park-and-ride lot on SR 92 will have convenient access to the system. A managed lane interchange is proposed at Big Shanty Road convenient to the existing Town Center and Busbee park-and-ride lots on Busbee Parkway.

The managed lanes on I-575 will be accessed by slip ramps from the general purpose lanes. Transit vehicles coming from the existing park-and-ride lot at His Hands Church just off SR 92 will access I-575 at the SR 92 general purpose interchange and then access the managed lane system at either the slip ramp near Shallowford Road or the slip ramp near Barrett Parkway. Transit vehicles coming from the existing park-and-ride lot at Boling Park in Canton will access the managed lanes at the northern terminus on I-575 just south of Sixes Road.

The managed lanes will provide direct connection to the existing HOV lanes on I-75 inside I-285 for trips to Midtown and downtown Atlanta.

C-2.2
The NWCP would not preclude improvements to the Windy Hill/I-75 interchange. GDOT will continue to coordinate with Cobb County Department of Transportation and Cumberland Community Improvement District (CCID) on the Windy Hill project. If the Premium Transit Service includes express buses or bus rapid transit (BRT) coaches, these vehicles would be able to access the NWCP managed lanes without paying the toll.

COMMENT C-2 (con't)

Mr. Darryl D. VanMeter, P.E.
November 18, 2011
Page 2

congested interstate bottlenecks Georgia while the Premium Transit Service extends regional transit service to the rapidly growing northwest region.

- In Upcoming Negotiations with Private Sector Partners, Examine Permitting High-Occupancy Vehicles (HOV) with Two or Three Persons Free Access to the Facility – Feedback received from local governments indicate a preference for allowing free access to the managed lanes for at least some high-occupancy vehicles. As stated in Section 2.1.6, the preferred tolling policy for the managed lanes facility is express toll lanes (ETL), requiring that all vehicles pay a toll regardless of occupancy. ARC requests the Department have the private sector partners determine the financial feasibility of allowing a level of free HOV use on the facility. ARC recognizes the state of Georgia and GDOT must balance the ability to provide free access against financial constraints. However, even if financial constraints eliminate this possibility, the opportunity cost of this tolling policy will need to be understood in the future and communicated to the public.

C-2.3 ▶

- Based on the lessons learned from the opening of the I-85 HOT Lanes, GDOT must monitor the location of managed lanes access points and evaluate the impact of these on facility operations and revenues. While the location of access points must balance the concerns of safety and available funding, public feedback on the I-85 HOT lanes project reflects dissatisfaction with the long spacing between access points. The longest distance between access points on I-85 is 7.5 miles. For the NWCP, the longest distance is 6.3 miles on I-75 from Big Shanty Road to Roswell Road. This could be a similar point of public dissatisfaction. GDOT must monitor the operations of the NWCP and have contingency plans in place to add, or adjust, the location of access points if needed.

C-2.4 ▶

ARC applauds GDOT in these efforts to implement the NWCP and will continue to offer our support as the project nears implementation.

Sincerely,

Jane D. Hayse
Chief, Transportation Division

c: Rodney Berry, P.E., FHWA

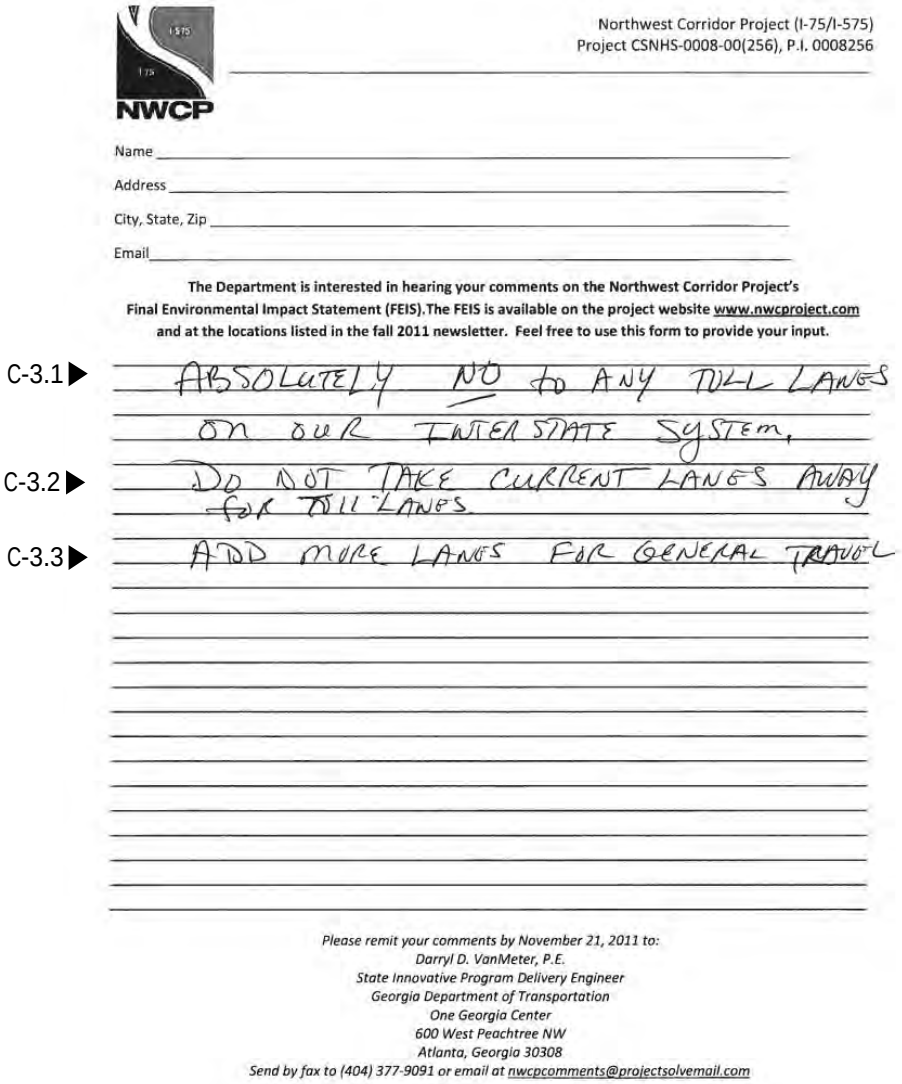
dkm

RESPONSE

C-2.3
If vehicles with as few as two occupants were allowed to use the managed lanes for free, the travel demand modeling indicated that the lanes would become congested, and there would not be a way to manage the flow. If the threshold were raised to allow vehicles with three or more occupants to use the managed lanes for free, there would be a significant increase in the amount of public funding required for the project. In addition, enforcement costs would increase if vehicles with three or more occupants were allowed to use the managed lanes for free.

C-2.4
In the AA/DEIS managed lane accesses at Allgood Road, the Canton Connector and flyover ramps from the mainline between I-575 and Roswell Road were investigated. Ultimately it was determined that the costs and impacts associated with an access in this area would exceed any expected benefits. Also, the I-575 reversible managed lane will connect to the I-75 reversible managed lane between Big Shanty Road and Roswell Road, so there will be an access to the northeast between the accesses noted in the comment. The public's satisfaction with the project, including access to the managed lanes, will be monitored through the Office of Communications, GDOT's Constituency Services Unit and GDOT's District and Area Offices throughout the service life of the project.

COMMENT C-3	RESPONSE



Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

Name _____

Address _____

City, State, Zip _____

Email _____

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS).The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-3.1 ▶ ABSOLUTELY NO TO ANY TOLL LANES ON OUR INTERSTATE SYSTEM,

C-3.2 ▶ DO NOT TAKE CURRENT LANES AWAY FOR TOLL LANES.

C-3.3 ▶ ADD MORE LANES FOR GENERAL TRAVEL

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-3.1
Your opposition to tolling is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

C-3.2
The Northwest Corridor Project does not propose to convert any existing lanes to toll lanes. The proposed managed lanes are new lanes being added to the existing corridor.

C-3.3
The addition of general-purpose lanes was considered in the AA/DEIS but eliminated because without tolls new general-purpose lanes would experience congestion. In January 2010, GDOT published the Atlanta Regional Managed Lane System Plan. Adopted by the State Transportation Board on December 10, 2009, this plan was developed at the direction of the State Transportation Board's resolution of June 21, 2007. It committed that "all new capacity lanes within limited access corridors in Metro-Atlanta shall be managed lanes." The Plan's specific goals and objectives serve as a guide to develop individual managed-lane projects in metropolitan Atlanta.

COMMENT C-4	RESPONSE

NWCP

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

RECEIVED
NOV - 4 2011
OFFICE OF
INNOVATIVE PROGRAM DELIVERY

Name
Address
City, State, Zip Marietta, GA 30064
Email

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS).The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-4.1 I Think we should expand bus service using smaller buses That go more places. With todays technology it is simple to track where and when the bus will arrive. It is easier to implement and we do not have to spend so much $ and wait 10 years!! I Think we have to redefine our goal to be: "Moving more people (efficiently, together) from point A to B" → we need a flexible system (bus) That can change as ~~[illegible]~~ patterns change. The Infrastructure changes take too long and cost too much. Thanks for listening!

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-4.1
Your support for bus usage is noted. Bus Rapid Transit was one of the alternatives evaluated in the 2007 DEIS. It was eliminated from further consideration due to a lack of public support, increasing competition for federal funding, and a lack of local funding, as discussed in Section 2.1.10 of the FEIS. Transit vehicles will be able to travel in the free-flowing managed lanes without paying a toll. Without managed lanes, buses have to travel in the same congested lanes as other vehicles.

COMMENT C-5

Form posted from web browser. Page 1 of 1

Form posted from web browser.
an email sent by (Site Administrator) on 2 Nov 11 at 8:34am

C-5.1

From: Bergman, Diane
To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com>

FirstName=
LastName=
Address=
2ndLineAddress=
EmailAddress=
Comments=Have you noticed that everyone in Gwinnett HATES the HOT LANES. Thanks for nothing. Spending a ton of money and not helping at all. Just give us our HOVs. I will NEVER ride in a lane that I have to pay money. What a load of BS.
submit=Submit

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

NOTICE: This e-mail message and all attachments transmitted with it may contain legally privileged and confidential information intended solely for the use of the addressee. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately by telephone (404-881-7000) or by electronic mail (postmaster@alston.com), and delete this message and all copies and backups thereof. Thank you.

Comments

https://ww7.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOV... 11/8/2011

RESPONSE

C-5.1
Your opposition to high occupancy toll (HOT) lanes is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. And by allowing single-occupant vehicles to use the lanes if they pay a toll, the managed lanes should not experience the "empty lane syndrome" that HOV lanes often experience. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

Managed lanes have been a topic in the Atlanta area media recently with the opening of the I-85 Express Lanes from Chamblee-Tucker Road in DeKalb County to Old Peachtree Road in Gwinnett County. While both the Northwest Corridor Project and the I-85 Express Lanes are intended to provide increased mobility and traffic relief in two of the region's most congested corridors, the scope and operation of the two projects vary greatly.

The I-85 project converted the existing High Occupancy Vehicle (HOV) lanes, one in each direction, into High Occupancy Toll (HOT) lanes. Vehicles with three or more riders can access the lanes for free; vehicles with one or two riders can access the Express Lanes for a fee. To use the I-85 Express Lanes, motorists must register for a Peach Pass account and obtain a transponder. Users may switch between a toll and a toll-free status, depending on their vehicle's occupancy, prior to their use of the lanes.

Some of the key differences between the I-85 project and the NWCP include:

- NWCP adds additional lanes to I-75 and I-575. Two new lanes would be added to I-75 between I-285 and I-575. One new lane would be added to I-75 between I-575 and north of Hickory

COMMENT C-5 (con't)	RESPONSE
This space is intentionally blank.	Grove Road, and one new lane would be added to I-575 between I-75 and Sixes Road. The project does not convert or change any of the existing lanes on I-75 or I-575. The reversible feature would help minimize traffic congestion in the direction with the most demand, e.g. southbound in the morning commute period and northbound in the afternoon commute period. • NWCP utilizes dedicated entrance and exit points on I-75. Six new managed lane interchanges are proposed on I-75. This would provide system-only access to and from the managed lanes to local streets, eliminating the need to cross over multiple lanes of traffic to enter or exit the system. The access locations would be separate from the general purpose interchanges. For I-575, users will continue to use the existing interchanges to enter and exit I-575, and access the managed lanes through three new pairs of slip ramps. • NWCP is barrier separated. The managed lanes system is separate from the existing I-75 and I-575 facilities, allowing enforcement of proper use of the lanes and management of incidents such as traffic accidents and vehicle breakdowns. • NWCP will toll all users. All motorists, regardless of how many passengers are in the car would be charged the same toll rate (excluding registered transit vehicles, military vehicles, emergency vehicles and school buses). Motorcycles must pay the toll to use the NWCP. • NWCP is a Public Private Partnership (P3) project. Final design and construction of the project will be conducted with private industry partners, which will greatly expand the options for innovative technology and funding.

COMMENT C-5 (con't)	RESPONSE
This space is intentionally blank.	Tolls for the Northwest Corridor Project will be collected electronically and toll amounts will vary by time of day and congestion level. Users will have the opportunity to pay by transponder or by license plate. Registration for a Peach Pass account will not be required, though existing Peach Pass account holders will be able to utilize their transponders to access the facility. Your support of HOV lanes is noted. HOV lanes, where usage is limited to vehicles with two or more occupants and no tolls are charged, were considered in the AA/DEIS. Traffic modeling indicated that these types of lanes would become congested quickly, even before the design horizon of 2035. Without implementing some sort of tolling, GDOT will not be able to maintain uncongested traffic flow in the proposed lanes. Use of the proposed lanes to experience travel time savings is completely voluntary.

COMMENT C-6	RESPONSE

Form posted from Windows Internet Explorer. (8) Page 1 of 1

Form posted from Windows Internet Explorer. (8)
an email sent by (Site Administrator) on 11 Aug 11 at 11:41am

From: Blackwell, Wesley T.
To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com>

C-6.1

FirstName=Wes
LastName=Blackwell
Address=3652 Longfellow Trail
2ndLineAddress=Marietta, GA 30062
EmailAddress=wblackwell@wilbursmith.com
Comments=This project would be a boon for Cobb and Cherokee. Can't wait to drive it!
MailingList=checkboxValue
submit=Submit

Comments

C-6.1
Your support for the Northwest Corridor Project is noted.

COMMENT C-7	RESPONSE

NWC Page 1 of 1

NWC

an email sent by (Site Administrator) on 30 Oct 11 at 10:32am

From: Jack and Sue
To: nwcpcomments@projectsolvemail.com

C-7.1

FirstName=Jack
LastName=Braz
Address=1850 Westbury Ln. Marietta, GA. 30064
2ndLineAddress=
EmailAddress=jacsuzi@comcast.net
Comments=This project will be a disaster for the community and our area by increasing traffic delays and commute times. If we were building a mass transit system that was convenient, and well planned out, I would applaud your efforts. However, this project is nothing more than a knee jerk reaction to the economy and lack of jobs. Please find a different way to employ construction folks without impacting the community at large.
submit=Submit

Comments

https://ww7.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOV... 11/8/2011

C-7.1
Your opposition to the Northwest Corridor Project is noted.

The Preferred Alternative is supportive of mass transit in that the lanes will be congestion-free and transit vehicles will be allowed to use the managed lanes without paying a toll. The project does not preclude rail transit in the future within the I-75 corridor.

COMMENT C-8	RESPONSE

C-8.1

From: Carol Brown [mailto:carolbrwn5@gmail.com]
Sent: Tuesday, January 24, 2012 12:31 PM
To: Lee, Tim
Cc: DiMassimo, Faye; Birrell, JoAnn; David.Hankerson@cobbcounty.org; Kristine Hansen-Dederick; woody.thompson@cobbcounty.org; hgoreham@cobbcounty.org; bob.ott@cobbcounty.org; Eberhart, Inger; Millie.Rogers@cobbcounty.org; King, Karen
Subject: TIA change to allow HOT lane on I 75

Good afternoon Chairman Lee,

For some time it has been clear that the NW Corridor has needed some type of transit or HOV lanes. Many of us have been engaged in the public planning processes for that for the past 6 years. I was looking forward to implementation of the P3, and was surprised when it ended. However, I believe that GDOT and Governor Deal made the right decision to protect the public interest in the future.

Now, you have an opportunity to amend the TIA list and partially fund the HOT lanes. This should be done for the good of the public and travelers in the region. I would ask that some funds be set aside to purchase BRT vehicles and to ensure that they use the cleanest fuels available. That is also in the public interest.

Hopefully, the HOT lanes could be integrated to function with some type of transit corridor on Cobb Parkway as well.

The backups seen yesterday on I 75 should never be allowed to happen again, without some alternative route. The HOT lanes would provide that.

Thank you for showing real leadership in this region,

Carol Brown
Canton Road Neighbors, Inc.

1

C-8.1
The Preferred Alternative is supportive of mass transit in that the lanes will be congestion-free and transit vehicles will be allowed to use the managed lanes without paying a toll.

Your support of HOV lanes is noted. HOV lanes, where usage is limited to vehicles with two or more occupants and no tolls are charged, were considered in the AA/DEIS. Traffic modeling indicated that these types of lanes would become congested quickly, even before the design horizon of 2035. Without implementing some sort of tolling, GDOT will not be able to maintain uncongested traffic flow in the proposed lanes.

Your support for high occupancy toll (HOT) lanes is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. And by allowing single-occupant vehicles to use the lanes if they pay a toll, the managed lanes should not experience the "empty lane syndrome" that HOV lanes often experience. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

Your support for delivery of the project through a public-private partnership (P3) approach procurement process is noted. Three teams were shortlisted for the project. However, the State recently decided to change the method of procuring a team for constructing the project and also decided to provide the majority of the cost of the project through public funds. The new method of procurement will still be a P3 utilizing a design-build-finance delivery option with a lesser amount of private financing.

No money from the Transportation Investment Act (TIA) to be voted on in the summer of 2012 would contribute to the Northwest Corridor Project.

COMMENT C-8 (con't)	RESPONSE
	Your support for bus usage is noted. Bus Rapid Transit was one of the alternatives evaluated in the 2007 DEIS. It was eliminated from further consideration due to a lack of public support, increasing competition for federal funding, and a lack of local funding, as discussed in Section 2.1.10 of the FEIS. Transit vehicles will be able to travel in the free-flowing managed lanes without paying a toll.

This space is intentionally blank.

COMMENT C-9

(untitled) (3) Page 1 of 1

(untitled) (3)
an email sent by (Site Administrator) on 1 Nov 11 at 1:04pm

C-9.1

From: nm wander
To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com>
Cc: "hansen-dederick@sycamoreconsulting.net" <hansen-dederick@sycamoreconsulting.net>

The Gwinnett County HOT lane project has recently openned for public use. The evidence is quickly mounting that this HOT project is a monumental failure.
Given the evidence, is it wise for the NWCP to continue to rapidly develop an HOT solution that increasingly looks like an out-dated and ineffective transportation improvement?
I would not want to encourage the leadership of NWCP to pursue a path that results in NWCP leadership caught in a position similar to that of the Cobb EMC Board of Directors, who also pursued an agenda that was at odds with popular support.

I do not object to the cost of this project or any other such project. MY concern is that this project is mis-guided and will NOT benefit the public, no matter how ofter the public relations team repeats the phrase,"This will benefit the public." We have entered the 21st Century, gas will never be cheap again, people are moving back towards the urban centers(or suburban centers, such as Cumberland Mall, Smyrna, Marietta). Our freeway system needs to be maintained it is true, but I do NOT believe there is any lane expansion that needs to be done on I-75/I-575. One practical alternative I will suggest is that better access roads and parallel roads be built in Cherokee County. There is far more at stake here than providing a Toll Commissioner with gainful employment. And the self-imagined Toll Commissioner will find an equally profitable career managing this type of construction effort, too.

I strongly urge that the NWCP delay construction and spend more effort re-evaluating the design parameters, such as growth patterns and economic trends.

Comments

https://ww7.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOV... 11/8/2011

RESPONSE

C-9.1
Managed lanes have been a topic in the Atlanta area media recently with the opening of the I-85 Express Lanes from Chamblee-Tucker Road in DeKalb County to Old Peachtree Road in Gwinnett County. While both the Northwest Corridor Project and the I-85 Express Lanes are intended to provide increased mobility and traffic relief in two of the region's most congested corridors, the scope and operation of the two projects vary greatly.

The I-85 project converted the existing High Occupancy Vehicle (HOV) lanes, one in each direction, into High Occupancy Toll (HOT) lanes. Vehicles with three or more riders can access the lanes for free; vehicles with one or two riders can access the Express Lanes for a fee. To use the I-85 Express Lanes, motorists must register for a Peach Pass account and obtain a transponder. Users may switch between a toll and a toll-free status, depending on their vehicle's occupancy, prior to their use of the lanes.

Some of the key differences between the I-85 project and the NWCP include:

- NWCP adds additional lanes to I-75 and I-575. Two new lanes would be added to I-75 between I-285 and I-575. One new lane would be added to I-75 between I-575 and north of Hickory Grove Road, and one new lane would be added to I-575 between I-75 and Sixes Road. The project does not convert or change any of the existing lanes on I-75 or I-575. The reversible feature would help minimize traffic congestion in the direction with the most demand, e.g. southbound in the morning commute period and northbound in the afternoon commute period.
- NWCP utilizes dedicated entrance and exit points on I-75. Six new managed lane interchanges are proposed on I-75. This would provide system-only access to and from the managed lanes to local streets, eliminating the need to cross over multiple lanes of traffic to enter or exit the system. The access locations

COMMENT C-9 (con't)	RESPONSE
This space is intentionally blank.	would be separate from the general purpose interchanges. For I-575, users will continue to use the existing interchanges to enter and exit I-575, and access the managed lanes through three new pairs of slip ramps. • NWCP is barrier separated. The managed lanes system is separate from the existing I-75 and I-575 facilities, allowing enforcement of proper use of the lanes and management of incidents such as traffic accidents and vehicle breakdowns. • NWCP will toll all users. All motorists, regardless of how many passengers are in the car would be charged the same toll rate (excluding registered transit vehicles, military vehicles, emergency vehicles and school buses). Motorcycles must pay the toll to use the NWCP. • NWCP is a Public Private Partnership (P3) project. Final design and construction of the project will be conducted with private industry partners, which will greatly expand the options for innovative technology and funding. Tolls for the Northwest Corridor Project will be collected electronically and toll amounts will vary by time of day and congestion level. Users will have the opportunity to pay by transponder or by license plate. Registration for a Peach Pass account will not be required, though existing Peach Pass account holders will be able to utilize their transponders to access the facility. The analysis contained in the FEIS demonstrates that capacity increases are needed on I-75 and I-575. This can be seen perhaps most clearly in the No-Build travel times in Figures 4-9 through 4-12. It is forecast that if no project is built increases in traffic volumes will lead to a 97.4 minute travel time from Akers Mill Road to Sixes Road in the PM Peak Hour in 2035 - nearly 100 minutes to travel just over 20 miles - compared to a 58.7 minute travel time for the same route in the PM Peak Hour in 2015.

COMMENT C-9 (con't)	RESPONSE
	Improvements to local roadway arterial systems were considered in the discussion of the Transportation System Management (TSM) approach in the SDEIS. Arterial improvements, including the proposed widening of Bells Ferry Road from Southfork Way to north of Sixes Road, are included in the No-Build alternative. As shown in the FEIS the No-Build alternative would not address the needs in the project corridor to 2035. The transportation modeling for the project uses the travel demand model prepared by the Atlanta Regional Commission, the federally-designated Metropolitan Planning Organization (MPO) for the 18-county Atlanta region. It includes future land use, population and employment. The project is designed to serve forecast travel patterns in 2035.

This space is intentionally blank.

COMMENT C-10	RESPONSE

NWCP

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

Name Virginia Connor
Address 163 Bristol Lane, NE
City, State, Zip Marietta, Ga 30066
Email Virginia_Connor@att.net (computer's down)

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-10.1 I see little or no mention of public transit. All you care about is those who drive. (Like the Wendy's nearby that deals in drive-through — no place to sit down outside and they won't let you order through the drive-through if the main door is locked). I ride public transit — no choice here and I'm not homeless! — and I'm sick of having to worry about my bus routes because there's no money in the budget for CCT, yet there seems to be plenty for more roads. What use is there when you have a light rail to Cumberland Mall and no way for the disabled/low income and elderly to get to it via the buses? (That's like having no way to get to the MARTA stations by foot but having plenty of parking spaces for the drivers!) Why not help pay for public transit via the Tolls? If we can support Pre-K via the lottery, why not using the money from the Tolls to help CCT, GCT, MARTA, even C-Train eventually? This way you could (1) Get those who shouldn't drive — Alzheimer's, those w/ mental retardation, epilepsy*, etc. off the roads, (2) clean up the air by lessening cars off the road, and (3) help those who have to depend on public transit to get around. It's bad enough the #65 bus was cut but the ADA won't even allow a paratransit bus to take that route.

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) ~~377~~-9091 or email at nwcpcomments@projectsolvemail.com

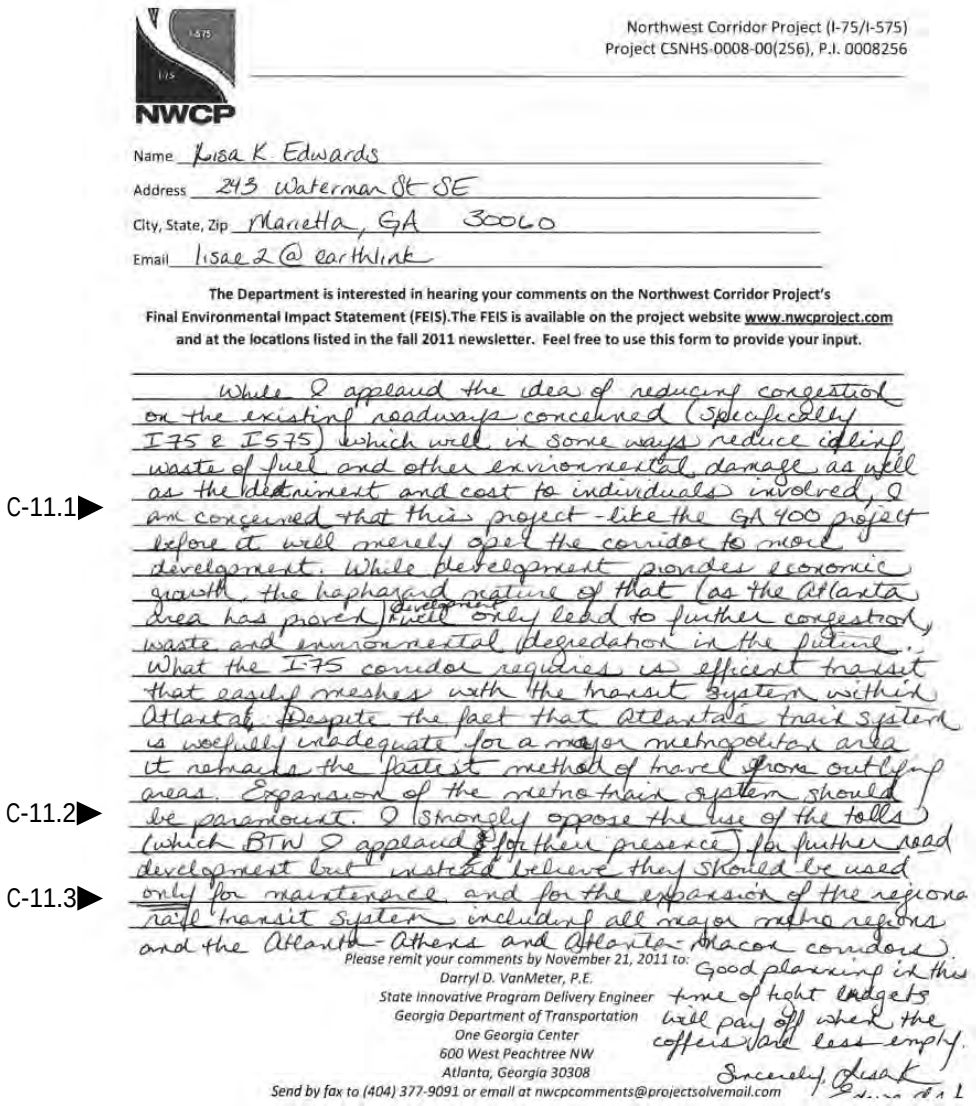
*There are those who had to lie and drive because they couldn't depend on P.T. to get to work or risk losing their jobs. I've been riding P.T. since 1978. Not all employers are so caring!

Sorry for my handwriting.

C-10.1
The Preferred Alternative is supportive of mass transit in that the lanes will be congestion-free and transit vehicles will be allowed to use the managed lanes without paying a toll. The project does not preclude rail transit in the future within the I-75 corridor.

It is anticipated that all of the road tolls will be needed to pay for the operation and maintenance of the facility and to pay off the debt associated with the construction of the project. If there are toll revenues in excess of the projections, these excess revenues would be used to help fund other transportation projects in the statewide plan.

COMMENT C-11



Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

Name Lisa K. Edwards
Address 243 Waterman St SE
City, State, Zip Marietta, GA 30060
Email lisae2@earthlink

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS).The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

While I applaud the idea of reducing congestion on the existing roadways concerned (specifically I75 & I575) which will, in some ways, reduce idling waste of fuel and other environmental damage as well as the detriment and cost to individuals involved, I am concerned that this project - like the GA 400 project before it will merely open the corridor to more development. While development provides economic growth, the haphazard nature of that (as the Atlanta area has proved) will only lead to further congestion, waste and environmental degradation in the future. What the I-75 corridor requires is efficient transit that easily meshes with the transit system within Atlanta. Despite the fact that Atlanta's rail system is woefully inadequate for a major metropolitan area it remains the fastest method of travel from outlying areas. Expansion of the metro rail system should be paramount. I strongly oppose the use of the tolls (which BTW I applaud for their presence) for further road development but instead believe they should be used only for maintenance and for the expansion of the regional rail transit system including all major metro regions and the Atlanta-Athens and Atlanta-Macon corridors. Good planning in this time of tight budgets will pay off when the coffers are less empty.

Sincerely, Lisa K

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-11.1 ▶
C-11.2 ▶
C-11.3 ▶

RESPONSE

C-11.1
Your concern that the project may induce people to live farther from their place of employment is noted. However, according to population projections and employment forecasts the region is predicted to continue to grow regardless of whether the Preferred Alternative is selected and implemented. Please see Section 5.18.2.1 in the FEIS for further information.

C-11.2
Your support for rail is noted. Heavy rail expansion in this corridor was one of eleven alternatives considered in the earlier Northwest Connectivity Study prepared by GRTA in 2004. It was not one of the three alternatives that advanced for further analysis in that study. The project does not preclude heavy rail in the future along the east side of I-75.

C-11.3
It is anticipated that all of the road tolls will be needed to pay for the operation and maintenance of the facility and to pay off the debt associated with the construction of the project. If there are toll revenues in excess of the projections, these excess revenues would be used to help fund other transportation projects in the statewide plan.

COMMENT C-12	RESPONSE

November 17, 2011

RECEIVED
NOV 18 2011
OFFICE OF
INNOVATIVE PROGRAM DELIVERY

DARRYL D. VanMETER, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, GA 30308

Dear Mr. VanMeter:

C-12.1

Unable to attend the Community Noise Wall Meetings due to work schedule conflicts, I understand that DOT has decided to not install a noise wall along I-75 between Bells Ferry Road and Dickson Road in Cobb County when I-75 is expanded to come closer to our houses. If this understanding is correct, I would implore DOT to review and reconsider the decision.

My wife and I currently reside at 54 Manuel Court, off Bells Ferry and near I-75. We have lived in this neighborhood for over 7 years, previously residing at 60 Manuel Drive in the same area. Throughout this time, we have been bothered by the noise from I-75 at its current distance, and can only imagine the noise levels we will have to endure with the interstate moving closer.

No matter which house you are at in the neighborhood, and despite reportedly being situated over 800 feet from the highway, conversations are difficult due to the traffic noise, if not impossible, if held outside. The only time it seems that we get solace from the constant noise is during the wee hours of Sunday Morning (generally 3am to 6am), or when an traffic incident has I-75 moving at a crawl. Otherwise, the noise is constant and, at times, loud enough to literally shake the houses. An added disturbance is the loud "bang" that is heard when a large truck or tractor-trailer crosses the bridge over Bells Ferry Road. The transition from one pavement type to another causes the trucks and their loads to bounce, creating bangs loud enough to make one think a wreck may have just occurred.

I had planned to get hold of a device that would record the noise levels to provide further evidence that your equipment did not provide a proper view of what occurs in this neighborhood; however, time did not allow for such a demonstration. Instead, as part of the review and reconsideration of the decision, I would ask that members of the decision-making committee spend a day in our neighborhood, and attempt to carry on normal conversations; better yet, that they attempt to carry on telephone calls in any one of our yards. As indicated, the visit would be welcome at any time of day, even at those times late at night when one would believe that the noise levels are low enough to warrant the decision already declared.

While your data may show that the noise levels are not high enough to require a noise wall for this

3595 Canton Road
A9 - #132
Marietta, GA 30066
epperson.matt@gmail.com
678-524-0175

C-12.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in Section 5.12, Appendix F and the Noise Technical Report of the FEIS. Preliminary noise walls are shown in Appendix H in Volume 2 of the FEIS. The noise analysis indicates that existing noise levels in the vicinity of Manuel Drive range from 63.0 dBA – 75.8 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.1 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 69.1 dBA – 78.0 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would not be cost effective. That is, the cost of a barrier would exceed the maximum cost allowable of $55,000 per benefitted receptor. Therefore, a noise wall is not proposed at this location.

The noise abatement evaluated at these locations is based upon preliminary noise analyses and design criteria.

A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the noise abatement will be reconsidered and might be provided based on additional public involvement.

The final locations and heights will not be established until final design. Property owners located behind proposed noise walls will be contacted to determine if there is a consensus to construct a particular noise wall or not.

COMMENT C-12 (con't)

area, a review of the data combined with a visit to this neighborhood would show that we live with constant noise from the interstate. The noise levels are high enough that they, according to OSHA regulations, would require hearing protection if this were a place of business instead of a residential area. At times, the level generates high enough to cause hearing damage almost immediately.

We hope that a review and reconsideration of the decision will warrant a reversal and that a wall protecting us from the highway noise will be deemed necessary to protect our homes, our hearing and our way of life. We look forward to your revised decision.

Sincerely,

Matthew Epperson

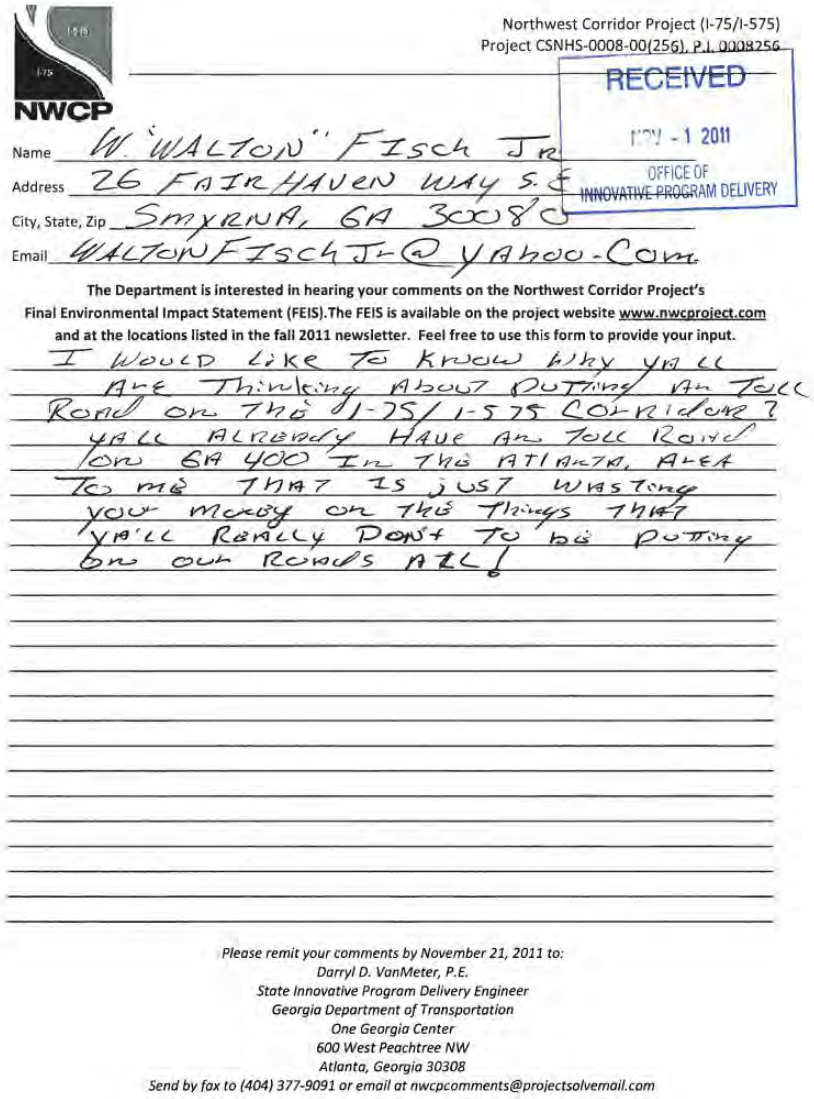
Matthew Epperson
Resident

RESPONSE

This space is intentionally blank.

COMMENT C-13	RESPONSE

C-13.1



NWCP

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

RECEIVED
NOV - 1 2011
OFFICE OF INNOVATIVE PROGRAM DELIVERY

Name W. "WALTON" FISCH JR
Address 26 FAIRHAVEN WAY S.E.
City, State, Zip SMYRNA, GA 30080
Email WALTONFISCHJR@YAHOO.COM

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS).The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

I WOULD LIKE TO KNOW WHY YA'LL ARE THINKING ABOUT PUTTING AN TOLL ROAD ON THE I-75/I-575 CORRIDORS? YA'LL ALREADY HAVE AN TOLL ROAD ON GA 400 IN THE ATLANTA AREA TO ME THAT IS JUST WASTING YOUR MONEY ON THE THINGS THAT YA'LL REALLY DON'T TO BE PUTTING ON OUR ROADS ALL!

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-13.1
Your opposition to tolling is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

SR 400 serves a different travel market than the I-75 / I-575 corridors. SR 400 provides access from the cities of Roswell, Alpharetta, Johns Creek and Cumming to the Buckhead area of Atlanta and then on to midtown and downtown Atlanta. I-75 and I-575 provide access from the cities of Marietta, Kennesaw, Woodstock and Canton to the Cumberland-Galleria area of Cobb County and then on to midtown and downtown Atlanta. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

COMMENT C-14	RESPONSE
C-14.1	C-14.1 Added to mailing list.

75/ 575 project mailing list Page 1 of 1

75/ 575 project mailing list
an email sent by (Site Administrator) on 19 May 11 at 10:39am

From: Shailesh M Ghodadra
To: <nwcpcomments@projectsolvemail.com>

Please includes us in a mailing list for the project progress.

Shailesh M. Ghodadra P.E.
Vice President
Neil Engineering, Inc.
(770) 736-3190 (Phone)
(770) 736-3190 (Cell)
(770) 736-6424 (Fax)

Comments

Attachments

https://ww7.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOV... 11/8/2011

COMMENT C-15

RESPONSE

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 404-521-9900 | 201 PEACHTREE STREET, SUITE 805 ATLANTA, GA 30303-1840 | Facsimile 404-521-990

November 21, 2011

By Electronic Mail and U.S. Mail

Rodney N. Barry, P.E.
Division Administrator
Federal Highway Administration
Georgia Division
61 Forsyth Street, SW
Suite 17T100
Atlanta, GA 30303-3104

Darryl VanMeter, P.E.
Office of Innovative Program Delivery
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 W. Peachtree Street, NW 27th Floor
Atlanta, GA 30308

RE: Comments on the Final Environmental Impact Statement for the Proposed Northwest Corridor Project

Dear Messrs Barry and VanMeter:

On behalf of Mothers & Others for Clean Air and the Sierra Club of Georgia, the Southern Environmental Law Center ("SELC") offers the following comments on the Final Environmental Impact Statement ("FEIS") for the proposed I-75/I-575 Northwest Corridor Project in Atlanta (hereinafter referred to as "the proposed project" or "the Northwest Corridor Project").

SELC submitted comments on the Supplemental Draft Environmental Impact Statement ("SDEIS") in December of last year and then submitted additional comments in February of this year. We appreciate your responses to our earlier comments but remain concerned about the

Charlottesville • Chapel Hill • Atlanta • Asheville • Birmingham • Charleston • Richmond • Washington, DC

100% recycled paper

This space is intentionally blank.

COMMENT C-15 (con't)

NEPA analysis conducted for the Northwest Corridor Project. In the interest of brevity, this letter will address only new issues presented by the FEIS along with several specific issues that have been previously raised. We reiterate the concerns in our prior comment letters and incorporate those comments by reference in their entirety.[1]

Toll Roads in the Atlanta Region: The public outcry over the new Interstate 85 toll lanes raises serious questions about the preferred alternative.

Since the close of the public comment period on the Northwest Corridor SDEIS, the Georgia Department of Transportation ("GDOT") opened the state's first managed lane project along Interstate 85. This project, which converted 15 miles of HOV lanes along I-85 to HOT+3 lanes, was funded in part by a $110 million federal Congestion Reduction Demonstration (CRD) program grant. The CRD program grant was intended to assess the impacts of managed lane projects in the Atlanta region and in other regions across the country.

Thus far, the I-85 managed lane project has proven wildly unpopular and of limited effectiveness in the Atlanta region. The I-85 project has been met with significant controversy from the moment it opened. Commuters have complained that the managed lanes are too complex, too costly, and too confusing. Drivers in the general purpose lanes have found that their trips have become longer and more congested as result of the managed lane conversion. Dissatisfied drivers have expressed their concerns at town hall meetings and have created advocacy groups to oppose the I-85 project. In response to the public outcry concerning the I-85 project, Governor Nathan Deal instructed the toll rate to be lowered more than 40 percent and requested the federal government's permission to operate the lanes as HOT+2 lanes. *See* Press Release, *Deal Lowers HOT lane rates* (Oct. 6, 2011) and Atlanta Journal-Constitution, *Gov. Deal lowers HOT lane fees for I-85 in Gwinnett* (Oct. 6, 2011). In light of the serious red flags raised by the region's experience with the I-85 project, it is perplexing that an Express Toll Lane ("ETL") configuration was chosen as the preferred alternative for the Northwest Corridor.

Unfortunately, this decision to adopt managed lanes as the preferred alternative could impact the region for years. The I-85 project and the Northwest Corridor Project are the first two projects in a planned regional managed lane network that would cost an estimated $16 billion dollars. According to the *Atlanta Regional Managed Lane System Plan*, revenue generated by the managed lanes would fall well below the full $16 billion cost. The revenue shortfall would require roughly $7 billion in state funds to pursue a strategy that fails to increase mobility for the majority of drivers, takes funding away from more effective transportation solutions, and has
C-15.1 ▶ proven unpopular with Atlanta residents. GDOT, SRTA, and FHWA should consider the costs, benefits, and financial feasibility of the regional managed lane network in its entirety before further pursuing this costly, ineffective, and unpopular strategy.

[1] The documents cited below are included on a CD sent with this letter.

2

RESPONSE

C-15.1

The *Atlanta Regional Managed Lanes System Plan* examines the value and develops a strategy for implementing a regional system of managed lanes. The total cost of the system is estimated at $16 billion with approximately $9 billion being financeable and approximately $7 billion being expended by the public sector or some other funding source. The plan further recommends an incremental approach to implementation allowing each project to be evaluated individually. The Plan makes a strong case for the value of managed lanes for the region to provide trip reliability for the public at substantially less cost than more traditional means of providing trip reliability, i.e. extensive roadway widening.

While the Northwest Corridor Project is included in the *Atlanta Regional Managed Lanes System Plan*, the project does not depend on the other potential projects in order to function. The project has logical termini and independent utility and can operate on its own. The traffic analysis for the Northwest Corridor Project was developed without including any of the other potential projects from the *Atlanta Regional Managed Lanes System Plan*. Managed lanes volumes, and travel time savings for both the managed lanes and the general purpose lanes can be achieved based on the analysis in the FEIS without relying on any other managed lane projects. This ensures that the preferred alternative has independent utility and does not rely on any other projects to achieve the benefits identified in the FEIS.

This project is substantially different from the I-85 project with the key difference being in the Northwest Corridor Project additional lanes will be constructed instead of converting the existing HOV2+ lane to a HOT3+ lane.

COMMENT C-15 (con't)

Purpose and Need: The preferred alternative fails to meet the purpose and need for the project.

The FEIS sets forth a statement of purpose and need for the Northwest Corridor project. The proposed project is to: (1) reduce congestion, (2) improve mobility by reducing travel time and increasing reliability, (3) improve access by improving connectivity between regional activity centers, (4) improve safety by reducing existing roadway design deficiencies and congestion-related crashes, and (5) reduce vehicle emissions by improving vehicular travel efficiency and increasing the portion of high capacity vehicles. *FEIS, Volume 1a* at S-3. The FEIS's preferred alternative, however, fails to adequately address most of those stated purposes.

C-15.2 ▶ First, the preferred alternative does not address the "need to reduce congestion" for the majority of drivers. *Id.* at S-3. In most sections along the Northwest Corridor, the managed lanes will only accommodate between 5% and 10% of the traffic volumes. *See id.* at Table 4-6, 4-10. That leaves roughly 90% to 95% of all drivers in the general purpose lanes where traffic conditions are not expected to improve. The FEIS actually notes this result, stating that **"[managed lanes] do not, nor are they intended to, resolve or even substantially improve congestion in the general purpose lanes."** *Id.* at 5-114 (emphasis added). Given that the vast majority of drivers will remain in the general purpose lanes and experience the same, if not worse, traffic congestion, the preferred alternative does not achieve this stated purpose.

The lack of traffic improvements in the general purpose lanes may seem counter-intuitive considering the preferred alternative would add 26 miles of new lanes. However, as the report prepared by the firm Smart Mobility[2] explains, additional road capacity, especially in the form of managed lanes, can induce additional traffic to the improved roads. This phenomenon, known as Braess's paradox, occurs because drivers seeking to optimize their trips are attracted to managed lane improvements. As new drivers are drawn to the Interstate system, new bottlenecks are created and congestion actually becomes worse.

C-15.3 ▶ Second, the lack of traffic benefits for the vast majority of drivers in the general purpose lanes also means that the preferred alternative will address neither the "need to improve mobility by reducing travel time and increasing reliability" nor "the need to improve connectivity between activity centers." *Id.* at S-3. Although the 5-10% of drivers using the managed lanes may experience shorter, more reliable trips, most drivers will continue using the general purpose lanes and will not experience these same benefits. Table 4-11 of the FEIS, for instance, demonstrates that vehicles traveling southbound during morning rush hour will actually travel more hours under the preferred alternative than under the no-build alternative. *Id.* at 4-22. This table also demonstrates that commuters will drive more miles under the preferred alternative. *Id.* Considering that under the preferred alternative approximately 90-95% of drivers will drive longer distances and spend more time in their cars, it is difficult to see how the FEIS can

[2] The Smart Mobility Report was attached SELC's comments on the SDEIS dated November 3, 2010.

3

RESPONSE

C-15.2
The Preferred Alternative does address the need to reduce congestion. Traffic congestion is a condition on road networks that occurs as use increases, and is characterized by slower speeds, longer trip times, and increased vehicular queuing. As noted in the FEIS, the managed lanes accommodate 5-10 percent of the traffic volumes in the corridor. The remaining 90-95 percent of the drivers in the general purpose lanes do not experience the same levels of traffic congestion under the Preferred Alternative as they would under the No-Build Alternative.

C-15.3
As noted in Table S-4 the AM Southbound 2035 travel times starting on I-575 at Sixes Road to Akers Mill Road on I-75 for the General Purpose Lanes are 11.4 percent less (8.4 minutes) under the Preferred Alternative than the No-Build Alternative. Similarly, the AM Southbound 2035 travel times starting at Hickory Grove Road on I-75 to Akers Mill Road are 13.8 percent less (8.4 minutes) under the Preferred Alternative than the No-Build Alternative. Table S-5 indicates the PM Northbound 2035 travel times in the general purpose Lanes beginning at Akers Mill Road to Hickory Grove Road on I-75 and Sixes Road on I-575 are 18.1 percent (13.8 minutes) and 16.1 percent (15.7 minutes) less respectively under the Preferred Alternative than the No-Build Alternative. Shorter trip times suggest increased speeds, and less congestion for the 90-95 percent of motorists in the general purpose lanes.

Braess's paradox essentially suggests that drivers will act to improve their travel times by choosing different routes than they presently use when additions are made to the road network. When different routes are chosen there may be congestion in areas where it does not exist now, causing an overall degradation of performance. Overall the I-75 and I-575 corridors will carry more traffic under the Preferred Alternative (managed lanes plus general purpose lanes), however the general purpose lanes under the Preferred Alternative carry less traffic than they do under the No-Build Alternative (Table 4-6). This additional traffic comes to the I-75/I-575 system under the Preferred Alternative from the adjacent street system such as US 41, a parallel roadway. This is the application of Braess's paradox;

COMMENT C-15 (con't)	RESPONSE
This space is intentionally blank.	drivers change their routes to optimize the route that benefits them the most, the shortest in terms of travel time. The anticipated redistributed traffic volumes were tested to identify the performance of the intersections adjacent to the I-75/I-575 system. Improvements were identified to achieve a Level of Service D standard at impacted intersections. Because the traffic volumes in the managed lane system are significantly lower in comparison to the general purpose lanes and will be metered by the toll rate charge to optimize the volume/performance ratio, the impact of the new managed lane interchanges on I-75 is small. While clearly there is a redistribution of traffic for the whole system, Table 5-5 and assessment on page 5-26 and 5-27 indicate that levels of service and travel times improve overall under the Preferred Alternative. Due to the effects of Braess's Paradox noted above, commuters will drive more miles under the Preferred Alternative than under the No-Build Alternative. However, the total vehicle hours of travel is less under the Preferred Alternative than the No-Build Alternative, not more as asserted. From Table 4-11, in 2015 AM peak period southbound the No-Build Alternative generates about 5,488 vehicle hours of travel compared to about 5,410 vehicle hours of travel under the Preferred Alternative, a difference of 78 hours. The difference is more in 2035 for the same conditions. The No-Build Alternative generates about 13,118 vehicle hours of travel, and the Preferred Alternative generates about 12,470 hours, a difference of 648 hours. Overall, in both directions of travel on I-75 (Table 4-10) the Preferred Alternative saves about 281 daily vehicle hours of travel in 2015 and about 4,304 daily vehicle hours of travel in 2035. On I-575 (Table 4-11) in both directions of travel the Preferred Alternative saves about 944 daily vehicle hours of travel in 2015 and about 1,250 daily vehicle hours in 2035. Total daily vehicle hours saved (I-75 and I-575) by the Preferred Alternative is about 1,225 in 2015 and about 5,554 in 2035. The Preferred Alternative does address the need to improve connectivity between activity centers. As noted in Chapter 7 of the FEIS, in the Preferred Alternative travel times to regional activity centers would be reduced for all modes of travel – SOV, HOV and transit - compared to the No-Build Alternative.

COMMENT C-15 (con't)

conclude that the preferred alternative reduces travel times, increases reliability, and improves connectivity between regional activity centers.

C-15.4 ▶ Third, the preferred alternative fails to meet the purpose of "reduc[ing] vehicle emissions by improving vehicular efficiency and increasing the proportion of high capacity vehicles." *FEIS, Volume 1a* at S-3. The preferred alternative increases vehicle miles traveled and as a consequence is likewise expected to increase vehicle emissions. Correcting the calculation of the percent change in air pollutant emissions between the Build and No-Build scenarios in Table 5-10, the preferred alternative would increase NOx emissions by 2.2%.[3] *Id.* at 5-61.

There is also no evidence that the preferred alternative would increase the number of high capacity vehicles. The decision to operate the managed lanes under an Express Toll Lane ("ETL") policy rather than under High-Occupancy +3 ("HOT+3") policy actually takes away the incentive to carpool, and in turn, would cause a reduction of high occupancy vehicles. *Id.* at *Traffic Technical Report*, Table 3-2. Moreover, although the FEIS repeatedly states that the preferred alternative would facilitate increased bus service and transit service in the region, the FEIS contains no analysis of whether an increase in transit services will actually occur. In fact, transit services in the Northwest Corridor are not expected to expand. Both Cobb County Transit and GRTA Xpress Bus Service have recently raised rates and cut service to offset shortfalls in their operating budget. *See* The Marietta Journal, *Commissioners raise transit fares once again* (Aug. 10, 2011) and The Times-Georgian, *Bus fares increase as GRTA faces budget crisis* (Aug. 15, 2010). The FEIS, however, makes no mention of these planned service changes. Both Cobb County Transit and GRTA also submitted proposals to the Transportation Investment Act Project List do address expected funding shortfalls. *See* Summary of Transportation Investment Act (TIA) Project Submittals (April 15, 2011) and Transportation Investment Act Final Report (Oct. 15, 2011).

Since the preferred alternative would increase air pollution and there is no basis for concluding that the project will result in increased transit ridership or carpooling, the preferred alternative fails to achieve the stated purpose of "the reduc[ing] vehicle emissions by improving vehicular efficiency and increasing the proportion of high capacity vehicles." *FEIS*, Volume 1a at S-3.

C-15.5 ▶ The preferred alternative fails to achieve the majority of the purpose and need criteria identified for the project. A project that does not meet the stated purpose should not be selected as the preferred alternative and a FEIS that reaches such a conclusion does not pass muster under NEPA. *See* 40 C.F.R. § 1502.1 (stating that the EIS must provide a "full and fair discussion of significant environmental impacts and . . . inform decisionmakers and the public of the

[3] Our previous comments pointed out that Table 5-8 in the SDEIS contained errors in its calculation of the percent change in air pollutant burdens between the Build and No-Build scenarios. These errors were not corrected and were carried over to the FEIS in Table in Table 5-10 on page 5-61.

4

RESPONSE

C-15.4

As mentioned in the response above, on I-75 (Table 4-10) in both directions of travel the Preferred Alternative saves 281 daily vehicle hours of travel in 2015 and 4,304 daily vehicle hours of travel in 2035. On I-575 (Table 4-11) in both directions of travel the Preferred Alternative saves 944 daily vehicle hours of travel in 2015 and 1,250 daily vehicle hours in 2035. Total daily vehicle hours saved (I-75 and I-575) by the Preferred Alternative is 1,225 in 2015 and 5,554 in 2035.

The decision to utilize Express Toll Lane (ETL) strategy for the corridor instead of a HOT3+ strategy could influence the creation of carpools. The potential does exist for individuals to form carpools and share the toll cost and the reduced travel time. The 3,000 person highway trip reduction as noted in Table 3-2 of the Traffic Technical Memorandum is for transit use. This is detailed in Appendix D of the Traffic Technical Memorandum, Performance Measure Reports 2035 No-Build and Preferred Alternatives, Page 1 of 31. These 3,000 added transit trips were achieved just through the existing transit system in 2035; those buses that are now on I-75 using the managed lanes. It is likely that in the future additional ridership could be achieved as the transit agencies, GRTA and CCT respond to the opportunity offered by the managed lanes for enhanced ridership. The Preferred Alternative does not preclude these agencies from instituting service changes in response to increased reliability of the system due to the managed lanes.

Table 5-10 in the FEIS incorrectly lists the tons per day of NOx for the Preferred Alternative as 47.59 in 2035. The correct amount should be 46.59 tons per day. This correction will be noted in the ROD. The percent change from No-Build shown in the table, 0.32 percent, is correct.

As shown in Table 5-10, the Preferred Alternative is expected to increase 2035 average daily VMT by 0.26 percent and increase regional pollutant emissions by 0.0 to 0.3 percent compared to the 2035 No-Build Alternative. These differences would result in no measurable impact on 2035 regional pollutant burdens. As such, the Preferred Alternative is predicted to have a minimal effect on regional pollutant burden levels.

COMMENT C-15 (con't)	RESPONSE
	C-15.5 Based on the responses provided in C-15.4, the Preferred Alternative does achieve the majority of the purpose and need criteria identified for the project.

This space is intentionally blank.

COMMENT C-15 (con't)

reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.").

C-15.6 ▶ **Cumulative and Indirect Impacts: The FEIS fails to analyze the full range of cumulative and indirect impacts associated with the Northwest Corridor Project.**

Our previous comments raised concerns regarding the SDEIS' failure to adequately consider the Northwest Corridor's full range of cumulative and indirect impacts. We specifically objected to the omission of the *Atlanta Regional Managed Lane System Plan* from the SDEIS's cumulative and indirect impacts analysis.

The FEIS relies on the same flawed analysis regarding the project's potential for cumulative and indirect impacts. The FEIS concludes that "the implementation of the regional plan is unlikely to impact growth and development in the Northwest Corridor either indirectly or cumulatively." *FEIS, Volume 1a* at 5-114. The FEIS further reasons that analyzing the impacts of the full managed lane plan is unnecessary because managed lane projects are "limited capacity facilities" and "**do not, nor are they intended to, resolve or even substantially improve congestion in the general-purpose lanes.**" *Id.* at 5-114 (emphasis added). Even if this were true, these unsupported assertions regarding potential growth and development are not the only indirect or cumulative impacts that could result from the preferred alternative.

The scale and complexity of the proposed regional managed lane network would cost $16 billion, span hundreds of miles, and significantly alter the highways traveled by millions of Atlanta drivers on a daily basis. It is inconceivable that the construction of this planned network would not have any cumulative and indirect regional impacts. Even if a single managed lane project may cause only minimal impacts, the cumulative effect of multiple projects would likely produce significant regional impacts. Consider, for example, the air quality impacts of the Northwest Corridor Project and the entire managed lane system. As noted above, if the calculation of the percent change in air pollutant burdens between the Build and No-Build scenarios in Table 5-10 is corrected, then the preferred alternative would increase NOx emissions by 2.2%. While the FEIS may deem a 2.2% increase in NOx emissions insignificant, the Northwest Corridor Project is only one of several managed lane projects planned in the Atlanta region. If other managed lane projects produce a similar 2.2% increase in NOx emissions, then the increase in NOx emissions cannot reasonably be described as negligible.

In fact, the FEIS concedes that the network will have cumulative impacts in the context of environmental justice. The FEIS asserts that "[s]ince cumulative effects include the potential effects of not only past and present actions, but also future actions, the potential effects of the whole *Atlanta Regional Managed Lane System Plan* . . . on environmental justice populations needs to be considered." *Id.* at 5-116.

While we certainly agree with the statement above, there is no apparent reason why this reasoning should not be applied to other impacts including effects on air quality, land use, traffic

5

RESPONSE

C-15.6

As previously noted, Table 5-10 in the FEIS incorrectly lists the tons per day of NOx for the Preferred Alternative as 47.59 in 2035. The correct amount should be 46.59 tons per day. This correction will be noted in the ROD. The percent change from No-Build shown in the table, 0.32 percent, is correct.

With regard to cumulative impacts, 40 CFR 1508.7 states "Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." Cumulative impacts for air quality are considered via the regional emissions analysis associated with conformity.

The Northwest Corridor Project is included in ARC's *PLAN 2040* RTP (ARC, 2011b) and FY 2012-2017 TIP (ARC, 2011c), which were adopted on July 27, 2011. The results of the emissions analysis for PLAN 2040 demonstrate adherence to the established 20-county Motor Vehicle Emissions Budget. The conformity analysis was performed for the years 2016, 2020, 2030 and 2040. The analysis years meet the requirements for specific horizon years that the transportation plan must reflect as specified in 93.106(a)(1) of the Transportation Conformity Rule and specific analysis years that the regional emissions analysis must reflect per Section 93.118(b) and 93.118(d)(2). Since the eight-hour ozone standard attainment year falls outside of the PLAN 2040 RTP horizon, a near-term year of 2016 was selected as the initial analysis year. This year is within five years of the conformity determination year of 2011, as suggested by the August 13, 2010 proposed Transportation Conformity Rule Restructuring Amendment revision to 93.118(b).

The FY 2012-2017 TIP is a direct subset of PLAN 2040 RTP. The conformity determination for the FY 20012-2017 TIP includes the same set of projects; defined by their design concept, design scope and analysis years, as PLAN 2040 RTP. The RTP and TIP are financially constrained consistent per 23 CFR Part 450 Subpart C (i.e., cost feasible). The funding source for construction and operation, if applicable, of all projects is identified and presented in

COMMENT C-15 (con't)	RESPONSE
This space is intentionally blank.	Volume I, Appendix A. The FY 2012-2017 TIP also meets all other planning requirements including: • Each program year of the FY 2012-2017 TIP is consistent with the federal funding that is reasonably expected for that year; • Required state and local matching funds, and funds for projects funded entirely by state and/or local money, are consistent with the revenue sources expected over the same period; • The FY 2012-2017 TIP is consistent with the conforming long-range plan such that the regional emissions analysis performed for the long-range plan directly applies to the TIP; • The FY 2012-2017 TIP contains all projects which must be started in the TIP time frame to implement the highway and transit system envisioned by the long-range plan in each of its horizon years; • All FY 2012-2017 TIP projects that are regionally significant are part of the specific highway or transit system envisioned in the long-range plan's horizon years; • The design concept and scope of each regionally significant project identified in the FY 2012-2017 TIP are consistent with PLAN 2040 RTP. Upon completion of the technical conformity analysis, ARC staff have determined that PLAN 2040 RTP and the FY 2012-2017 TIP together demonstrate compliance with the Clean Air Act as amended in 1990 in accordance with all conformity requirements as detailed in 40 CFR Parts 51 and 93 (the Transportation Conformity Rule) and 23 CFR Part 450 (the Metropolitan Planning Regulations as established in SAFETEA-LU, source: http://www.atlantaregional.com/plan2040/documents--tools). The *PLAN 2040* RTP and the FY 2012-2017 TIP were approved by the Georgia Regional Transportation Authority on August 18, 2011 and the FHWA issued a conformity determination on September 6, 2011. As such, the Northwest Corridor Project is part of a conforming RTP and TIP, and the cumulative impacts of the project have been thus evaluated. The Northwest Corridor Project also was included in the positive conformity determination for Amendment 10 of the *Envision6* RTP.

COMMENT C-15 (con't)	RESPONSE
This space is intentionally blank.	Individual states must develop plans to reduce air pollution to acceptable levels in the timeframe prescribed by the Clean Air Act. These air quality plans are referred to as the State Implementation Plans (SIP). Clean Air Act requirements ensure that transportation plans, programs, and projects in non-attainment and maintenance areas conform with the purpose of the STIP via the transportation conformity process, as discussed above. Your comment that "*…the FEIS concedes that the network will have cumulative impacts in the context of environmental justice. The FEIS asserts that '[s]ince cumulative effects include the potential effects of not only past and present actions, but also future actions, the potential effects of the whole Atlanta Regional Managed Lane System Plan…on environmental justice populations needs to be considered."* takes the discussion of the Managed Lane System Plan in the FEIS out of context. While the FEIS states that cumulative impacts on environment justice populations need to be considered, it concludes that the cumulative effect of the Atlanta Regional Managed Lane System on environmental justice populations in the study area is not anticipated to be disproportionate. It does mention some areas of concern, which focus on access to information regarding the operations and benefits of managed lanes. The FEIS cites the findings of the *Atlanta Regional Managed Lane System Plan, Technical Memorandum 9: Social Equity and Environmental Effects Evaluation* (HNTB, 2010) report, which concluded that environmental justice communities are not disproportionately impacted by managed lanes and that the congestion reduction resulted in the potential for air quality benefits.

COMMENT C-15 (con't)

congestion, travel patterns, state transportation funding, managed lanes operations, transit service, and carpooling. The sheer size and cost of the proposed regional managed lane system, not to mention the marked policy shift that building a managed lane system (and converting HOV lanes) represents, requires that the environmental, operational, and social effects of the system as a whole be reviewed before moving forward with the Northwest Corridor Project. Further, considering the potential cumulative impacts analysis is consistent with the "worst case scenario" approach suggested by CEQ guidance. *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations*, 46 F.R. 18026 (March 23, 1981) (Q20a and 20b).

C-15.7 ▶ **Analysis of Alternatives: The alternatives analysis fails to adequately consider transit alternatives currently under NEPA review by another federal agency.**

The FEIS continues to endorse a flawed alternatives analysis by omitting from serious consideration a light rail line and other transit options being studied along the I-75 corridor. The Federal Transit Administration is currently preparing the "*Northwest Atlanta Corridor Alternatives Analysis Study*" to evaluate mass transit options in the Northwest Corridor.[4] Eliminating transit improvements as a reasonable alternative when a parallel alternatives analysis by a sister agency is underway is inconsistent and contrary to the letter and purpose of NEPA.

Responding to SELC's comments, GDOT states that Cobb County considers the Northwest Corridor Project "to be a complementary, not competing, project to transit in the corridor." *See Letter to Brian Gist from Glenn Bowman, P.E.* (Oct. 17, 2011). As a threshold matter, a project's "complimentary" nature is not a basis for exclusion from NEPA review. Further, this argument is rebutted by the fact that GDOT did consider transit alternatives, such as a light rail line, in its analysis. The initial development of alternatives for the Northwest Corridor Project began during GDOT's Design Concept Study and GRTA's Northwest Corridor Connectivity Study: Conceptual Alternatives Memorandum (GRTA 2003b). GRTA's Northwest Corridor Connectivity Study included a light rail and other transit alternatives in its analysis. The rail alternative was later eliminated, stating that the alternative was not cost effective.

GDOT's consideration of a rail alternative is relevant for a number of reasons. First, it demonstrates that transit alternatives and highway alternatives are not mutually exclusive. Second, these earlier studies did not eliminate the rail alternatives for failing to meet the stated purpose and need. Third, to the extent that a rail alternative was previously dismissed on cost grounds, the conclusions reached in the Northwest Atlanta Corridor Alternatives Analysis Study are directly relevant to whether that decision remains valid.

GDOT also responds that consideration of a light rail alternative is unnecessary because "the award of an Alternatives Analysis (AA) project to Cobb County Department of Transportation by FTA does not imply FTA endorsement of the overall project" and "[a]n

[4] Comments and information regarding this study were previously submitted as part of our comments on the SDEIS.

6

RESPONSE

C-15.7
The DEIS, issued April 26, 2007, evaluated a number of transit options. These transit options were not chosen to advance for a number of reasons that are documented in Chapter 2 of the SDEIS and Chapter 2 of the FEIS. A transit-only alternative without the extension of the HOV lanes was considered and eliminated because implementation of transit-only improvements without extension of the HOV lanes on I-75 would not meet the project's purpose and need.

In the project study area, Cobb County initiated an Alternatives Analysis (AA) in August 2011 to evaluate enhanced transit in the US 41/I-75 corridor. The purpose and need for the AA is likely to differ from that of the NWC project. The system under study by Cobb County, while complimentary, would serve different markets and different trip types.

The GDOT is working closely with Cobb County as it moves forward with its AA, which kicked off in August 2011. Depending on the outcome of the AA, the Cobb County project could move into the NEPA phase.

The Northwest Corridor Project does not preclude transit in the corridor if the AA finds that transit is feasible. Cobb County supports the Northwest Corridor Project and provided letters of support to GDOT for its TIFA and TIGER grant applications. The letter of support is attached.

In addition, feasibility planning and a Tier 1 NEPA document are underway to use the I-75 corridor for high-speed rail service connecting Atlanta to Chattanooga, Nashville, and the Midwest.

COMMENT C-15 (con't)

alternatives analysis does not predetermine that a project is feasible or an optimal strategy for a study corridor." *See Letter to Brian Gist from Glenn Bowman, P.E.* (Oct. 17, 2011). The Alternatives Analysis does not predetermine that the transit alternative would be the preferred alternative for the corridor, but it raises a strong presumption that the project is a reasonable alternative that must receive thorough consideration under NEPA. The ongoing Alternatives Analysis is certainly relevant to whether a transit alternative is feasible in the corridor and could potentially meet the enumerated purpose and need criteria better than the preferred alternative. Issuing the FEIS before the transit alternatives have been fully considered through the Alternatives Analysis process renders the FEIS incomplete and its conclusions premature.

The feasibility of this project is further supported by the fact that Cobb County recently submitted a light rail line proposal for the Transportation Investment Act project list in the same corridor where FTA is studying light rail as an alternative. *See* Summary of Transportation Investment Act (TIA) Project Submittals (April 15, 2011). Had Cobb County determined that light rail in the Northwest Corridor was infeasible, it would not have submitted such a proposal for consideration in the Transportation Investment Act project list.

The FTA Alternatives Analysis study and Cobb County's inclusion of the project on the Transportation Investment Act project list raise a strong presumption that the project is a sufficiently reasonable and viable alternative for transportation in the Northwest Corridor. The FEIS' failure to give the preferred alternative the required "hard look" and to integrate the two concurrent NEPA analyses raise serious questions about the legal sufficiency of the FEIS.

C-15.8 ▶ **Environmental Justice: Any Record of Decision issued for this project must adopt specific mitigation measures and explain why reasonable mitigation measures are or are not appropriate.**

As required under NEPA, the FEIS analyzes the equity impacts of the Northwest Corridor project on low income and transit dependent populations. The environmental justice section of the FEIS reviews literature, examines studies, and even attempts to model tolling effects of the preferred alternative. The FEIS ultimately concludes that the preferred alternative will benefit low-income communities, subject to the caveat that "there are limitations to the analysis and some uncertainties inherent with predicting future acceptance of managed lanes in the project corridor." *FEIS, Volume 1a* at 5-47. This important caveat is in line with a recent study by the Transportation Research Board, which concludes that broad generalizations about the fairness of managed lanes are not only misleading, but they also oversimplify equity concerns related to managed lane projects. *See Equity of Evolving Transportation Mechanisms*, Transportation Research Board (2011).

The admitted limitations on predicting the equity impacts of managed lanes on low-income communities highlight the need for the adoption of concrete mitigation measures before the conclusion of the NEPA process. The FEIS discusses several ways in which impacts on low-

7

RESPONSE

C-15.8
Should the Preferred Alternative become the Selected Alternative, the Record of Decision will include specific mitigation measures that will be implemented to mitigate impacts on low-income populations.

Specific mitigations measures to be implemented include:

- SRTA will be required to provide a payment mechanism for persons who do not have a credit card via cash accounts or pre-paid accounts at walk-in customer service centers and/or retail outlets.
- GDOT will conduct annual studies that monitor the system for potential impacts to environmental justice populations and provide opportunities for the public to submit feedback on system operations and customer satisfaction for a period of three years from project opening.

SRTA is currently working with third parties to identify locations throughout the region for customers to replenish their cash-backed pre-paid accounts and pay video toll invoices and violation notices.

COMMENT C-15 (con't)

RESPONSE

income populations could be mitigated, such as flexing toll revenue to transit projects, toll discounts for low-income populations, walk-in customer service centers, and monitoring system operations. *See FEIS, Volume 1a* at 5-37 to 5-49. However, the FEIS does not actually commit to any of these mitigation measures but instead simply suggests that these measures are under consideration. *See id.* at 5-49.

This wait-and-see approach adopted by the FEIS is not sufficient. The FEIS correctly recognizes that the equity impacts of the project depend, at least in part, on the mitigation measures employed. But without knowledge of the mitigation measures that will be employed it is impossible for the project's equity impacts to be adequately identified and considered as required by NEPA.

Atlanta's recent experience with managed lanes in the context of the I-85 project highlights the importance of mitigation measures. The two policy directives sought by Governor Deal – capping the toll and seeking leave to allow HOV2+ vehicles in the lanes – are mitigation measures intended to increase the accessibility of these lanes to a broader constituency. Unlike the I-85 project, the Northwest Corridor Project will be funded and operated by a private partner. The private partner will aim to maximize its profits, even if doing so comes at the expense of low-income populations. Common provisions in public-private partnership agreements, such as non-compete clauses limiting construction of nearby arterial roads, restrictions on the frequency of transit services, or tolling carpools, could have broad impacts on low-income populations. Absent concrete mitigation measures in place before GDOT enters into the public-private partnership agreement, low-income populations will be more vulnerable to profit-seeking motives of the private partner.

NEPA requires that mitigation measures be explained and committed to in the Record of Decision. CEQ regulations specifically explain that "[t]he Record of Decision should contain a concise summary identification of the mitigation measures which the agency has committed itself to adopt" and "state whether all practicable mitigation measures have been adopted, **and if not, why not.**" *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations*, 46 F.R. 18026 (March 23, 1981) (Q34c) (emphasis added).

Any ROD issued for this project must include a robust consideration of all measures the FEIS identified as potential mitigation for the preferred alternative's equitable impacts. Further, in addition to the mitigation measures outlined in the FEIS, any ROD must also consider flexing toll revenue to fund increased transit service and offering reduced tolls for HOV vehicles in the managed lanes.[5] Both of these strategies have been employed elsewhere, including Atlanta's I-85 managed lane project, to minimize the inequitable impacts of managed lanes. *See, e.g., FEIS*

[5] Although the FEIS compares the ETL and HOT3+ management strategies for purposes of traffic modeling, the FEIS does not compare these management strategies for purposes of their potential impact on low income populations. The ROD must consider partial or full access to the managed lanes by low income carpools as a potential mitigation strategy.

8

This space is intentionally blank.

COMMENT C-15 (con't)

RESPONSE

Volume 1a at 5-40 (stating that "[t]he equity issues in I-15 [in San Diego] were addressed by dedicating some of the express lane revenues to bus service.").

NEPA makes clear that mitigation measures must be thoroughly identified, evaluated, and committed to at the time the ROD is issued. A ROD issued without a complete consideration of mitigation measures will not meet the legal requirements of NEPA.

Conclusion

The massive cost and public scrutiny regarding managed lanes in Atlanta highlight the need for a careful and thorough consideration of this project, both independently and in the context of the larger proposed network. We believe there are a number of areas where the FEIS' consideration is insufficient and fails to meet the requirements of NEPA. Thank you for your work in preparing the FEIS and your consideration of these comments. Should you have any questions about our comments, we would be happy to discuss them at any time.

Sincerely,

Brian L. Gist
Senior Attorney

J. Wyatt Kendall
Associate Attorney

Enclosures

cc:

Governor Nathan Deal (w/o enclosures)
Mr. Douglas Hooker, Atlanta Regional Commission (w/o enclosures)
Chairman Tim Lee, Cobb County Board of Commissions (w/o enclosures)
Chairman Buzz Ahrens, Cherokee County Board of Commissioners (w/o enclosures)

9

This space is intentionally blank.

COMMENT C-16

RESPONSE

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 404-521-9900

THE CANDLER BUILDING
127 PEACHTREE STREET, SUITE 605
ATLANTA, GA 30303-1840

Facsimile 404-521-9909

December 20, 2011

By U.S. Mail

Rodney N. Barry, P.E.
Division Administrator
Federal Highway Administration
Georgia Division
61 Forsyth Street, SW
Suite 17T100
Atlanta, GA 30303-3104

Darryl VanMeter, P.E.
Office of Innovative Program Delivery
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 W. Peachtree Street, NW 27th Floor
Atlanta, GA 30308

RE: Environmental Review of the Proposed I-75 / I-575 Northwest Corridor Project

Dear Messrs Barry and VanMeter:

The Georgia Department of Transportation recently announced that it would not proceed with procurement of the I-75 / I-575 Northwest Corridor Project as a public private partnership. *See*, Dec. 14, 2011 Georgia DOT Press Statement and "*DOT pulls plug on $1 billion I-75/I-575 project*," Atlanta Journal Constitution (Dec 15, 2011). In light of this decision, the Federal Highway Administration should not issue a Record of Decision for this project until firm financial commitments for building and operating the project are in place.

The Final Environmental Impact Statement ("FEIS") for this project bases its analysis on the assumption that a "P3 Developer would provide private funds that contribute to the design, construction, operation, maintenance, and financing in return for the right to retain toll revenues collected from users of the facility over the performance period." FEIS at 2-11.

Section 2.1.6 of the FEIS discusses how the public-private partnership arrangement for this project impacted the financial feasibility of the Preferred Alternative and other alternatives considered as part of the environmental review process.

> The GDOT evaluated toll revenue bonds, general obligation bonds, general obligation bonds with refinancing (e.g., using toll revenue bonds), a concession, and system-backed financing.

This space is intentionally blank.

COMMENT C-16 (con't)

> After a thorough review of the procurement options, budget constraints and 2009 state legislation (Senate Bill 200), GDOT determined that a public-private partnership (P3) procurement would be the best approach to deliver the project. A P3 procurement would leverage limited transportation funds by partnering with the private sector to provide supplemental funding. Private industry partners are also able to bring innovative approaches, both in terms of funding and project delivery methods.

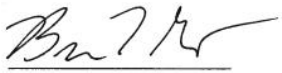
Id. at 2-10. The FEIS estimates that 41% of the project's funding would be provided by the private partner. *Id.* at 2-54.

Georgia DOT's decision not to proceed with this project as a public-private partnership raises serious questions about the feasibility of the preferred alternative. In light of this decision it is unclear whether "the design, construction, operation, maintenance, and financing" of this project will proceed as described and analyzed in the FEIS.

C-16.1 ▶ Given the uncertainty surrounding the project's funding and concerns about the feasibility of the Preferred Alternative, the Federal Highway Administration should not issue a Record of Decision for this project until a firm financial plan for the construction and operation of the project is in place. Further, when those commitments are in place, the Federal Highway Administration must re-examine whether the Preferred Alternative remains feasible in light of the new financial circumstances and whether other information underpinning the document's conclusions remains valid.

Please contact me with any questions or concerns at (404) 521-9900.

Sincerely,



Brian L. Gist
Senior Attorney

J. Wyatt Kendall
Associate Attorney

2

RESPONSE

C-16.1
We concur with this comment. The Record of Decision will include a firm financial plan, and FHWA will thoroughly evaluate this plan before issuing the Record of Decision.

COMMENT C-17	RESPONSE

Form posted from Microsoft Internet Explorer. Page 1 of 1

Form posted from Microsoft Internet Explorer.
an email sent by (Site Administrator) on 17 Mar 11 at 11:29am

From: Gregson, Mark W
To: <nwcpcomments@projectsolvemail.com>

Form posted from Microsoft Internet Explorer.
FirstName=Mark
LastName=Gregson
Address=44 Mayflower Ct
2ndLineAddress=Dallas, Ga 30132
EmailAddress=mark.gregson@invesco.com
Comments=Please add me to your distribution list.
MailingList=checkboxValue
submit=Submit

C-17.1

Comments

C-17.1
Added to mailing list.

COMMENT C-18	RESPONSE

Media Inquiry Page 1 of 1

NWCP NORTHWEST CORRIDOR PROJECT

Media Inquiry
an email sent by (Site Administrator) on 1 Nov 11 at 8:49pm

From: Julia Harris
To: nwcpcomments@projectsolvemail.com

Dear NWCP,

I have written a news article about NWCP that published Tuesday afternoon. Here is the link:
http://patch.com/A-nwFW

C-18.1 A few readers of Northeast Cobb Patch have asked where the toll point will be. Can you please tell me near what I-575 exits the toll booth will be constructed? Or, will it be constructed where I-75 meets I-575?

Thank you for your time.

Sincerely,

Julia
--
Julia Harris, Northeast Cobb Patch Editor
678-490-4729
Northeastcobb.patch.com
Facebook: www.facebook.com/northeastcobbpatch
Twitter: www.twitter.com/necobbpatch
Allison Bentley, Advertising Manager 404-538-1942 or allison.bentley@patch.com

Comments

C-18.1
Tolling will be accomplished electronically with no toll booths constructed.

COMMENT C-19	RESPONSE

NWCP

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

Name Gary V. Henderson P.E. (Civil) & C.S.P (Certified Safety Prof.)
Address 3742 Baccurate Way
City, State, Zip Marietta GA 30062
Email garyhenderson3742@att.net

RECEIVED
NOV - 1 2011
OFFICE OF
INNOVATIVE PROGRAM DELIVERY

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-19.1

I would like to propose a solution to a problem that may not as yet be properly addressed by this project, and that is the traffic conflict between NB 75 east Cobb traffic and 285 to NB 75 traffic between 285 and the Windy Hill/Delk Road areas. During the evening rush, these traffic groups create a dangerous bottleneck due to the crossing pattern of 285 traffic trying merge left and east Cobb traffic trying to merge right in this area. Some of this crossing pattern traffic can be relieved by creating an access for NB 75 traffic coming from inside 285 to get to the right side of 75 north of 285 without having to cross three or more lanes of traffic to get there.

On the attached annotated aerial, you will see a red line indicating a potential solution to this problem. Currently, there is an exit only lane from 75 NB to Windy Hill Road that crossed under the 285 ramp to 75 NB. By building another tunnel under the 285 to Windy Hill ramp, traffic from 75 NB inside 285 could take the current Windy Hill exit, cross under the 285 to Windy Hill ramp and merge into the far right side of 75 NB before the Windy Hill overpass. Since most of the 285 to 75NB traffic is moving left in this area, the right lane experiences very light traffic, making a safe merge into that lane relatively easy.

The relief this could provide is huge. When I worked downtown, there were many days that traffic was stopped on 75 NB inside 285 due to the cross-traffic mayhem at the NB 75-285 merge in the Windy Hill Road area. I believe my proposal could address some of this congestion problem at a relatively minor expense while improving the safety and convenience for all travelers in this area during the peak PM rush.

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

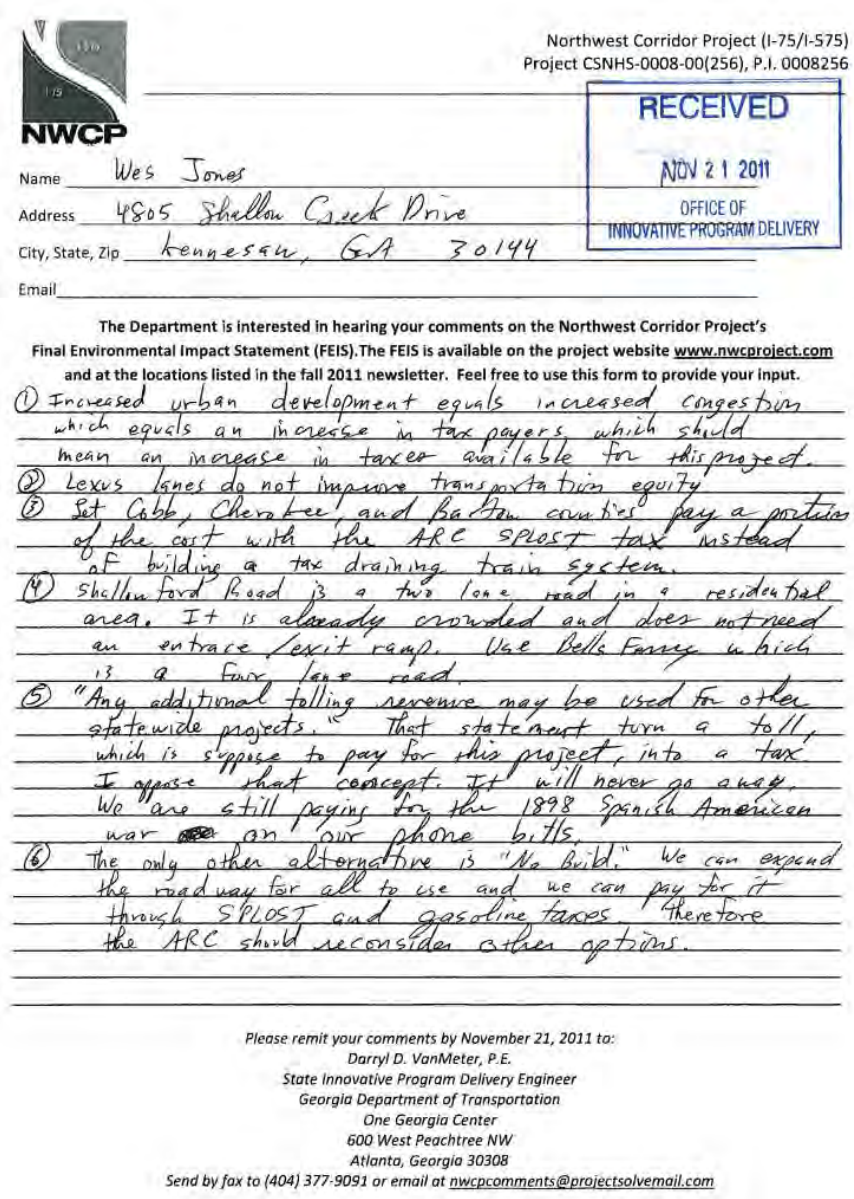
C-19.1
Your suggested improvement for northbound traffic on I-75 between I-285 and Delk Road is very similar to a planned project in the Atlanta Regional Commission's current transportation plan. It is project CO-AR-238. The current plan is to include the construction of this project with the construction of the project that proposes to add managed lanes to I-285 north between I-75 and I-85 (Revive285).

COMMENT C-19 (con't)	RESPONSE

This space is intentionally blank.

COMMENT C-20 (con't)

RESPONSE



NWCP

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

RECEIVED
NOV 21 2011
OFFICE OF
INNOVATIVE PROGRAM DELIVERY

Name Wes Jones
Address 4805 Shallow Creek Drive
City, State, Zip Kennesaw, GA 30144
Email

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-20.1 ▶ (1) Increased urban development equals increased congestion which equals an increase in tax payers, which should mean an increase in taxes available for this project.

C-20.2 ▶ (2) Lexus lanes do not improve transportation equity

C-20.3 ▶ (3) Set Cobb, Cherokee, and Bartow counties pay a portion of the cost with the ARC SPLOST tax instead of building a tax draining train system.

C-20.4 ▶ (4) Shallowford Road is a two lane road in a residential area. It is already crowded and does not need an entrance/exit ramp. Use Bells Ferry which is a four lane road.

C-20.5 ▶ (5) "Any additional tolling revenue may be used for other statewide projects." That statement turn a toll, which is suppose to pay for this project, into a tax. I oppose that concept. It will never go away. We are still paying for the 1898 Spanish American war on our phone bills.

C-20.6 ▶ (6) The only other alternative is "No Build." We can expand the road way for all to use and we can pay for it through SPLOST and gasoline taxes. Therefore the ARC should reconsider other options.

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-20.1
Chapter 2 of the FEIS described how a developer would fund a majority of the cost of the project. However the State recently decided to change the method of procuring a team for constructing the project and also decided to provide the majority of the cost of the project through public funds. Tolls allow users of the proposed facility to pay for the majority of the project rather than the general public.

C-20.2
With regard to transportation equity, users of the general-purpose lanes are also expected to experience travel time savings. Transit vehicles will be able to travel in the uncongested managed lanes without paying a toll.

C-20.3
No money from the TSPLOST to be voted on in the summer of 2012 would contribute to the Northwest Corridor Project.

Your opposition to rail expansion is noted. The Northwest Corridor Project does not include any rail expansion.

C-20.4
No access between Shallowford Road and existing I-575 general purpose lanes or between Shallowford Road and the proposed I-575 managed lane is included in the Northwest Corridor Project. The slip ramps on I-575 described as north and south of Shallowford Road are ramps connecting the existing I-575 general purpose lanes to the proposed I-575 managed lane.

C-20.5
It is anticipated that all of the road tolls will be needed to pay for the operation and maintenance of the facility and to pay off the debt associated with the construction of the project. If there are toll revenues in excess of the projections, these excess revenues would be used to help fund other transportation projects in the statewide plan.

COMMENT C-20 (con't)	RESPONSE
	C-20.6 The addition of general-purpose lanes was considered in the AA/DEIS but eliminated because without tolls new general-purpose lanes would experience congestion. In January 2010, GDOT published the Atlanta Regional Managed Lane System Plan. Adopted by the State Transportation Board on December 10, 2009, this plan was developed at the direction of the State Transportation Board's resolution of June 21, 2007. It committed that "all new capacity lanes within limited access corridors in Metro-Atlanta shall be managed lanes." The Plan's specific goals and objectives serve as a guide to develop individual managed-lane projects in metropolitan Atlanta.

This space is intentionally blank.

COMMENT C-21	RESPONSE

NWCP Comments Page 1 of 1

NWCP Comments

an email sent by (Site Administrator) on 6 Nov 11 at 10:50am

From: Stephen Kahle
To: <nwcpcomments@projectsolvemail.com>

To whom it may concern,

As a user of the corridor, I have the following comments after reviewing the latest concept drawings. Please take these into consideration as you see fit.

C-21.1 ▶ • I recommend that a managed lane exit be provided at either Akers Mill Road or the Cobb Parkway/Galleria area. Akers Mill would probably be the cheapest since there is plenty of room in the median of I-75 north of Akers Mill. Otherwise a C-D road access to Cobb Parkway would also make sense. I think that those who work in the Cumberland Galleria area really need a way to access the lanes.

C-21.2 ▶ • I recommend that a managed lane exit be provided at Canton Highway/Hwy 5. There is a large volume of traffic that enters and exits I-75 at this location. Much of this volume comes from Canton Highway and Sandy Plains Road in East Cobb. The latest concept does not show a viable alternative for these travelers. If it is too expensive to construct a managed lane interchange for Canton Highway, another alternative like Canton Road should be considered at a minimum.

C-21.3 ▶ • I think it would be advisable to make these lanes available to HOV users. Adding a set of managed lanes with different rules is going to be confusing for the public. In addition, I think that it is important that we continue to promote carpooling in the Metro area. Not allowing HOV access to these lanes is going to send the wrong message. I realize that there are probably costs associated with this change, but I feel it is important to have at least 3+ HOV access to the managed lanes.

C-21.4 ▶ • Designing the lanes at the beginning and termination points to avoid added congestion for non-users will be important for this project's success and public acceptance.

C-21.5 ▶ • Other than those comments, I think the concept is viable and will work.

Steve Kahle, P.E.
Cobb County Resident and I-75 Commuter

Comments

C-21.1
The north facing ramps at Akers Mill Road for access to the managed lane system would be a desirable modification. However, the proximity of the existing I-285 interchange to the north makes this not a reasonable alternative. The I-75 bridge over the eastbound collector-distributor system on the south side of I-285 would require replacement or extensive modification since the grade change for the ramps from Akers Mill Road would extend across this bridge.

C-21.2
In the AA/DEIS managed lane accesses at Allgood Road, the Canton Connector and flyover ramps from the mainline were investigated. Ultimately it was determined that the costs and impacts associated with an access in this area would exceed any expected benefits.

C-21.3
Your support of HOV lanes is noted. HOV lanes, where usage is limited to vehicles with two or more occupants and no tolls are charged, were considered in the AA/DEIS. Traffic modeling indicated that these types of lanes would become congested quickly, even before the design horizon of 2035. Without implementing some sort of tolling, GDOT will not be able to maintain uncongested traffic flow in the proposed lanes.

C-21.4
Traffic operations at the project termini are described in Section 2.4 Project Termini of the FEIS.

C-21.5
Your support for the Northwest Corridor Project is noted.

COMMENT C-22	RESPONSE
please add me to project mailing list Page 1 of 1  C-22.1 **please add me to project mailing list** an email sent by (Site Administrator) on 24 Oct 11 at 5:37pm From: J. Wyatt Kendall To: "'nwcpcomments@projectsolvemail.com'" <nwcpcomments@projectsolvemail.com> Wyatt Kendall jwkendall@selcga.org Comments	C-22.1 Added to mailing list.

COMMENT C-23

RESPONSE

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

Name Sharon Kinyon
Address 417 Falcon Ct
City, State, Zip Woodstock GA 30188
Email Skinyon26@hotmail.com

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-23.1 I am opposed to hot lanes. They were a disaster in I-85 where recently implemented. Traffic congestion increased and the public has begun circulating petitions to have the lanes removed. There is no reason to think that hot lanes will be any more successful in Cherokee County

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-23.1
Your opposition to high occupancy toll (HOT) lanes is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. And by allowing single-occupant vehicles to use the lanes if they pay a toll, the managed lanes should not experience the "empty lane syndrome" that HOV lanes often experience. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

Managed lanes have been a topic in the Atlanta area media recently with the opening of the I-85 Express Lanes from Chamblee-Tucker Road in DeKalb County to Old Peachtree Road in Gwinnett County. While both the Northwest Corridor Project and the I-85 Express Lanes are intended to provide increased mobility and traffic relief in two of the region's most congested corridors, the scope and operation of the two projects vary greatly.

The I-85 project converted the existing High Occupancy Vehicle (HOV) lanes, one in each direction, into High Occupancy Toll (HOT) lanes. Vehicles with three or more riders can access the lanes for free; vehicles with one or two riders can access the Express Lanes for a fee. To use the I-85 Express Lanes, motorists must register for a Peach Pass account and obtain a transponder. Users may switch between a toll and a toll-free status, depending on their vehicle's occupancy, prior to their use of the lanes.

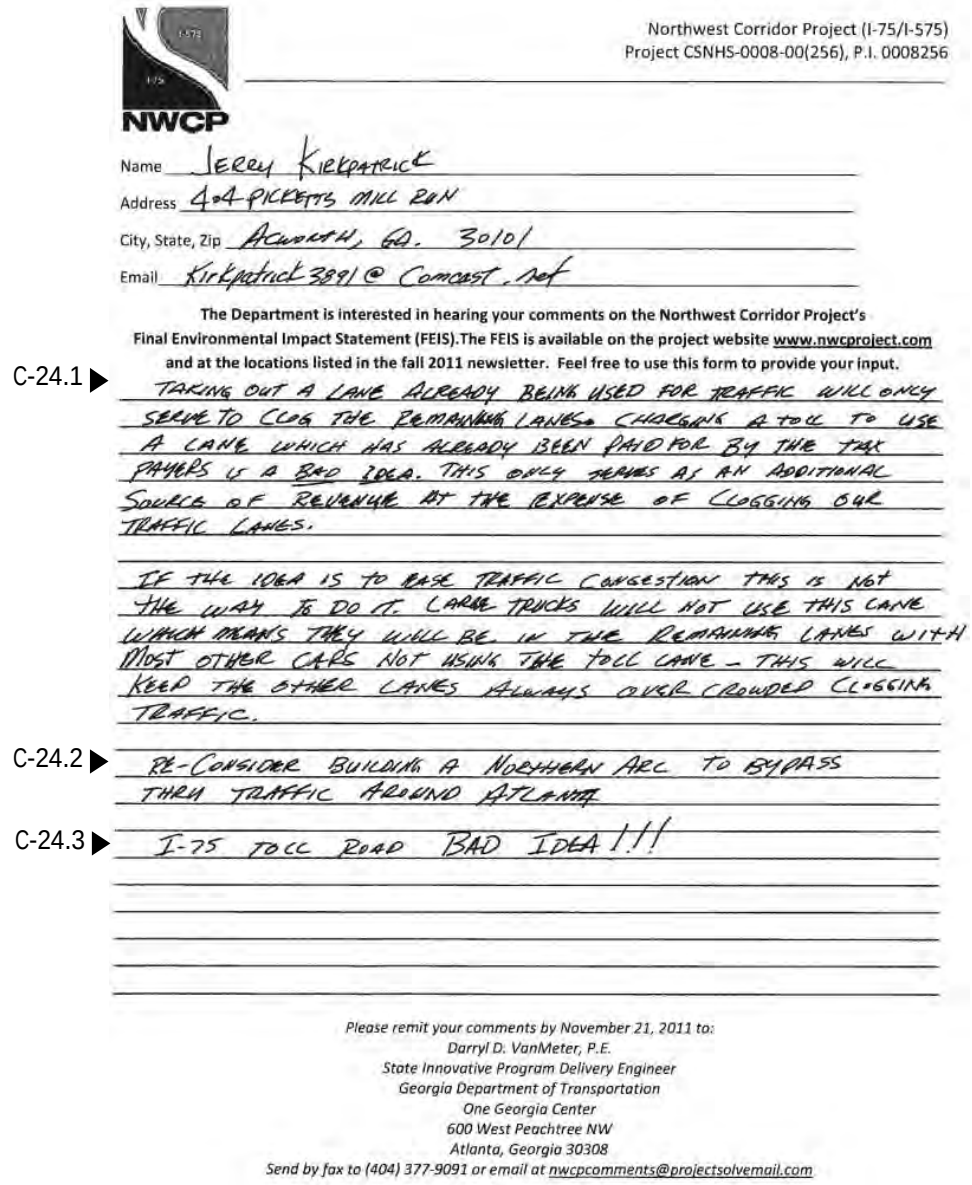
Some of the key differences between the I-85 project and the NWCP include:

- NWCP adds additional lanes to I-75 and I-575. Two new lanes would be added to I-75 between I-285 and I-575. One new lane would be added to I-75 between I-575 and north of Hickory Grove Road, and one new lane would be added to I-575 between I-75 and Sixes Road. The project does not convert or change any of the existing lanes on I-75 or I-575. The reversible feature would help minimize traffic congestion in the direction with the most demand, e.g. southbound in the morning commute period

COMMENT C-23 (con't)	RESPONSE
This space is intentionally blank.	and northbound in the afternoon commute period. • NWCP utilizes dedicated entrance and exit points on I-75. Six new managed lane interchanges are proposed on I-75. This would provide system-only access to and from the managed lanes to local streets, eliminating the need to cross over multiple lanes of traffic to enter or exit the system. The access locations would be separate from the general purpose interchanges. For I-575, users will continue to use the existing interchanges to enter and exit I-575, and access the managed lanes through three new pairs of slip ramps. • NWCP is barrier separated. The managed lanes system is separate from the existing I-75 and I-575 facilities, allowing enforcement of proper use of the lanes and management of incidents such as traffic accidents and vehicle breakdowns. • NWCP will toll all users. All motorists, regardless of how many passengers are in the car would be charged the same toll rate (excluding registered transit vehicles, military vehicles, emergency vehicles and school buses). Motorcycles must pay the toll to use the NWCP. • NWCP is a Public Private Partnership (P3) project. Final design and construction of the project will be conducted with private industry partners, which will greatly expand the options for innovative technology and funding. Tolls for the Northwest Corridor Project will be collected electronically and toll amounts will vary by time of day and congestion level. Users will have the opportunity to pay by transponder or by license plate. Registration for a Peach Pass account will not be required, though existing Peach Pass account holders will be able to utilize their transponders to access the facility.

COMMENT C-24

RESPONSE



Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

Name Jerry Kirkpatrick

Address 404 Pickett's Mill Rd N

City, State, Zip Acworth, GA. 30101

Email Kirkpatrick3891@Comcast.net

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-24.1 ▶ TAKING OUT A LANE ALREADY BEING USED FOR TRAFFIC WILL ONLY SERVE TO CLOG THE REMAINING LANES. CHARGING A TOLL TO USE A LANE WHICH HAS ALREADY BEEN PAID FOR BY THE TAX PAYERS IS A BAD IDEA. THIS ONLY SERVES AS AN ADDITIONAL SOURCE OF REVENUE AT THE EXPENSE OF CLOGGING OUR TRAFFIC LANES.

IF THE IDEA IS TO EASE TRAFFIC CONGESTION THIS IS NOT THE WAY TO DO IT. LARGE TRUCKS WILL NOT USE THIS LANE WHICH MEANS THEY WILL BE IN THE REMAINING LANES WITH MOST OTHER CARS NOT USING THE TOLL LANE - THIS WILL KEEP THE OTHER LANES ALWAYS OVER CROWDED CLOGGING TRAFFIC.

C-24.2 ▶ RE-CONSIDER BUILDING A NORTHERN ARC TO BYPASS THRU TRAFFIC AROUND ATLANTA

C-24.3 ▶ I-75 TOLL ROAD BAD IDEA!!!

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-24.1
The Northwest Corridor Project does not propose to convert any existing lanes to toll lanes. The proposed managed lanes are new lanes being added to the existing corridor.

Tolls shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility. It is not anticipated that the tolls will exceed the cost of operating and maintaining the facility and paying off the debt associated with the construction of the project. It is important to note that variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling.

With the exception of transit vehicles and military vehicles, vehicles with more than two axles or six wheels will be prohibited from using the proposed managed lanes.

C-24.2
Your support for a Northern Arc project is noted. However, this project, the Northwest Corridor Project, is a separate project with its own need and purpose. The Northwest Corridor Project in no way affects the likelihood of a Northern Arc project. There is no limited access facility between I-75 and I-85 north of I-285 included in the regional transportation plan (Plan 2040).

C-24.3
Your opposition to the Northwest Corridor Project is noted.

COMMENT C-25

Northwest Corridor Project (2) Page 1 of 1

Northwest Corridor Project (2)
an email sent by (Site Administrator) on 7 Jun 11 at 3:19pm

From: Ellen Lepa \(Hunt Development Group\)
To: <nwcpcomments@projectsolvemail.com>

Dear Sirs,

C-25.1 I am writing to you regarding the status of the above project. It is our understanding that this is a P3 project. Hunt Development is part of Hunt Companies, Inc., based in El Paso, Texas - a fully integrated real estate developer specializing in military housing, family housing and various other projects that we design, fund, build and manage.

Please let me know if the Georgia Department of Transportation has already announced the request for proposals, etc. Thank you very much for your assistance. I look forward to hearing from you.

Kind regards,

Ellen E. Lepa
Office Manager/EA to Sinclair Cooper
Hunt Development Group
1020 19th Street, NW
Suite 420
Washington, D.C. 20036
(202) 680-0095

Comments

RESPONSE

C-25.1
The Northwest Corridor Project was to have been delivered through a highly regulated public-private partnership (P3) approach procurement process. Three teams were shortlisted for the project. However, the State recently decided to change the method of procuring a team for constructing the project and also decided to provide the majority of the cost of the project through public funds. The new method of procurement will still be a P3 utilizing a design-build-finance delivery option with a lesser amount of private financing.

COMMENT C-26	RESPONSE

Form posted from Windows Internet Explorer. (7) Page 1 of 1

Form posted from Windows Internet Explorer. (7)
an email sent by (Site Administrator) on 29 Dec 10 at 3:44pm

From: Levy, Alex
To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com>

FirstName=Anonymous
LastName=
Address=
2ndLineAddress=
EmailAddress=tonyjatl@yahoo.com
C-26.1 Comments=Sope Creek is erroneously referred to as a tributary of Rottenwood Creek. In fact, it is a direct tributary of the Chattahochee River. Confluence with the river is at Columns Drive in Cobb County.
submit=Submit

Comments

C-26.1
You correctly noted a mistake on page 26 of 90 of the Ecology Technical Report. The text should read "Stream 14, Sope Creek, is a warm-water perennial tributary to the Chattahoochee River" instead. This will be corrected in the Record of Decision.

COMMENT C-27

NOV/21/2011/MON 09:49 AM TRAVELPORT FAX No. 7705637016 P.001/001

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

Name TIM LINK

Address 2450 Lakebrooke Dr.

City, State, Zip Marietta, GA 30066

Email

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-27.1 ▶ Reversible lanes are a good idea.

C-27.2 ▶ Toll lanes are a stupid idea. Only people with money will want to pay the toll fees.

C-27.3 ▶ A rail line for commuters going down the interstate would be sensible.

Please remit your comments by November 21, 2011 to:
Darryl D. VonMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

RESPONSE

C-27.1
Your support for the reversible lanes included in the Northwest Corridor Project is noted.

C-27.2
Your opposition to high occupancy toll (HOT) lanes is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

C-27.3
Your support for rail is noted. Heavy rail expansion in this corridor was one of eleven alternatives considered in the earlier Northwest Connectivity Study prepared by GRTA in 2004. It was not one of the three alternatives that advanced for further analysis in that study. The project does not preclude heavy rail in the future along the east side of I-75. Locating rail in the median of I-75 would require rebuilding much of I-75. The traffic impacts during construction and cost of doing this would be undesirable.

COMMENT C-28	RESPONSE

Inquiry of Project Page 1 of 1

Inquiry of Project

an email sent by (Site Administrator) on 30 Mar 11 at 10:34am

From: Leah Maguffee
To: <nwcpcomments@projectsolvemail.com>

To Whom It May Concern,

C-28.1

I am writing to inquire about the status of the **I-75 Northwest Corridor Project**. I spoke with Mr. Hancock, project manager, back in November and at that time the project was going through the environmental clearance stage and was about to choose a preferred alternative. I was just wondering if a preferred alternative had been chosen yet, and if so which alternative is the preferred? What stage is the project currently in? Is there an expected date as to when final ROW plans may be completed and when ROW acquisitions will begin?

Thank you in advance for your time and assistance. Should you have any questions please feel free to contact me.

Sincerely,

Leah Maguffee
Biersdorf & Associates, P.A.
33 South Sixth Street, Suite 4100
Minneapolis, MN 55402

866.339.7242
Leah@condemnation-law.com

Comments

C-28.1
Right of way acquisition could begin in 2013.

COMMENT C-29

RESPONSE

NWCP NORTHWEST CORRIDOR PROJECT

noise issues

an email sent by (Site Administrator) on 2 Nov 11 at 5:01pm

From: Rube McMullan
To: nwcpcomments@projectsolvemail.com

I met with Jen Price yesterday and she suggested I communicate via email regarding concerns I have as they may effect my property. I own the southeast and northeast corners of the I-75/Hwy 120 south Loop interchange. I also own many single family rental homes located at this interchange. There has been a ongoing development plan to re-develop this property for high density commercial use. Unfortunately with the state of the development economy, no such opportunity is anticipated for many years to come. As a result, I am now having to focus on the rental homes as the best use for the property in terms of generating income to support debt. A number of these homes are located adjacent to and basically overlook I-75. Noise and air pollution are and have been a significant negative issue for the property's, however with the re-development plans anticipated, I have not made an issue of this. Now, with no re-development opportunities available, and now with the expanded plan for the interstate creating both noise/air pollution, and aesthetic problems, I must address my most sincere concerns for the economic viability of my properties as rental homes. I am already forced to discount rentals for these properties due to the existing conditions, which will only get worse with the NW Corridor project.

C-29.1 ▶

Having reviewed the wall plans, and it's aesthetic issue for my homes directly impacted by the wall; as well as looking at the cost of the wall, I respectfully request consideration be given to purchase these properties and thus remove the substandard housing that will be whats left for these properties after the NW Corridor project.

C-29.2 ▶

I am available to discuss this matter at any time. Thank you.

Rube McMullan

McMullan Properties

870 Old Canton Rd

Marietta, GA 30068\

RubeMc@att.net

(770) 977-1852-office

(404)372-5523-cell

(770) 971-3057-fax

Comments

C-29.1

The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in Section 5.12, Appendix F and the Noise Technical Report of the FEIS. Preliminary noise walls are shown in Appendix H in Volume 2 of the FEIS.

Your concern that the project may worsen air quality in the region is noted. However, the project is not predicted to cause a violation of the currently applicable National Ambient Air Quality Standards. Furthermore, it is anticipated that the project would have no measurable impact on regional Mobile Source Air Toxics levels. Please see Section 5.11 in the FEIS for further information.

C-29.2

As noted in Environmental Commitment 12 in the FEIS, context-sensitive aesthetic finishes will be used on noise walls and structural retaining walls.

COMMENT C-30	RESPONSE

(untitled) (2) Page 1 of 1

(untitled) (2)
an email sent by (Site Administrator) on 31 Oct 11 at 2:58pm

From: Alex Miltiades
To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com>

FirstName=Alex
LastName=Miltiades
Address=754 Red Coat Cove
2ndLineAddress=Kennesaw
EmailAddress=Amiltiades@bellsouth.net

C-30.1 I do not support any road construction which will have to be supported by a toll or fee.

Alex Miltiades

Comments

C-30.1
Your opposition to tolling is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

COMMENT C-31	RESPONSE

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

RECEIVED
NOV - 1 2011
OFFICE OF
INNOVATIVE PROGRAM DELIVERY

Name Jeffrey Moon
Address 12453 Hwy 92
City, State, Zip Woodstock GA 30188
Email jmoon@woodstockga.gov

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS).The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-31.1 I think it is critical that this project only move forward if it adds travel lanes. The conversion of existing lanes, especially on I-575 would not seem appropriate.

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-31.1
The Northwest Corridor Project does not propose to convert any existing lanes to toll lanes. The proposed managed lanes are new lanes being added to the existing corridor.

COMMENT C-32	RESPONSE

Deer Run Subdivision - I575&exit 8

an email sent by (Site Administrator) on 5 Jul 11 at 2:49pm

From: Sam Nemat
To: <nwcpcomments@projectsolvemail.com>

Hello,

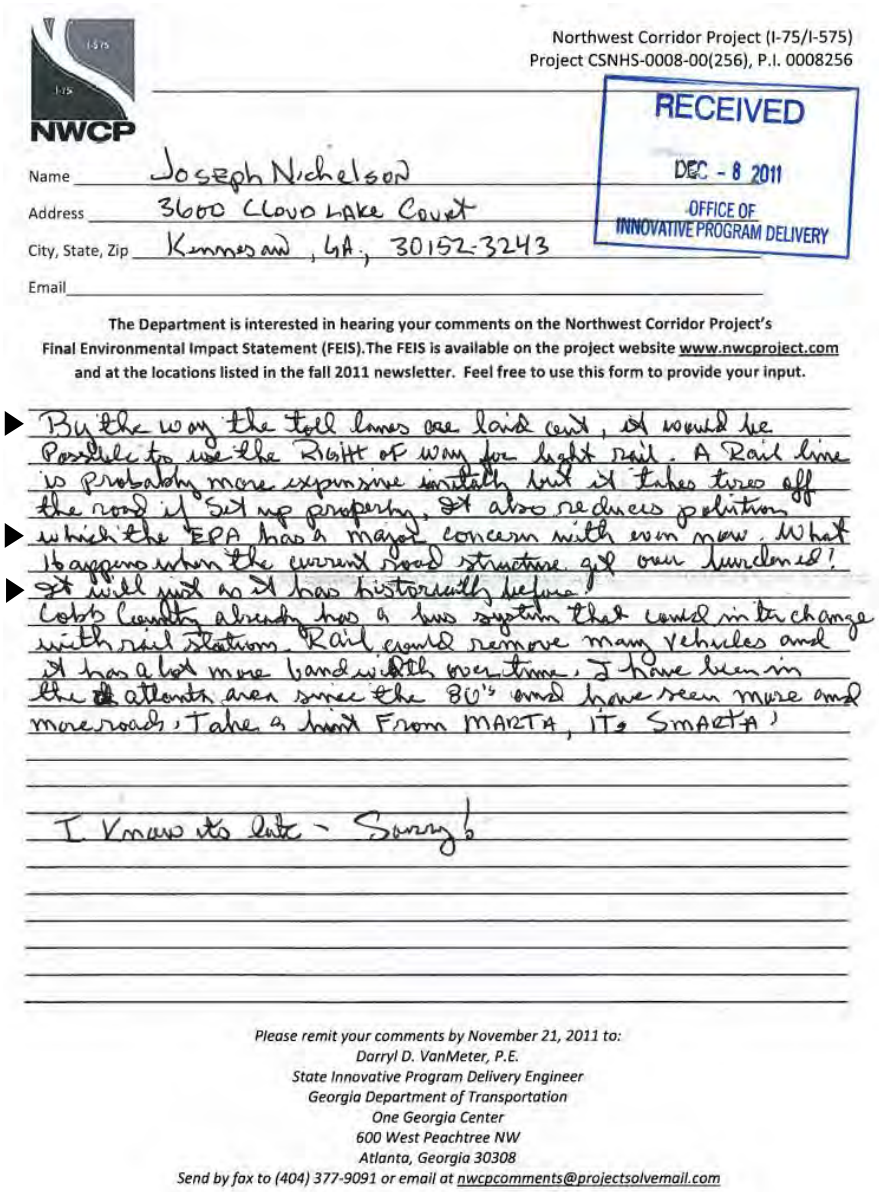
C-32.1 I would like to know if there are plans to construct wall and barrier to cut down on the noise along I575 north of exit 8 Townelake by Deer Run Subdiv. Many trees has been cut down and this has increased noise from highway.

I look forward to hear from you,
Sam Nemat

Comments

C-32.1
The Deer Run subdivision located on the west side of I-575, north of Towne Lake Parkway, will receive noise mitigation in the form of noise walls as a part of the I-575 at Ridgewalk Parkway interchange project that is currently under construction. For information purposes, the extents of the noise wall are shown in Volume 2 of the FEIS on Sheets H-26 and H-27. The noise analysis performed for the Northwest Corridor Project included this noise wall and found that length and height of this noise wall would not need to be increased as a result of the Northwest Corridor Project.

COMMENT C-33



Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

RECEIVED
DEC - 8 2011
OFFICE OF INNOVATIVE PROGRAM DELIVERY

Name Joseph Nicholson
Address 3600 Cloud Lake Court
City, State, Zip Kennesaw, GA., 30152-3243
Email

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-33.1 ▶ By the way the toll lanes are laid out, it would be possible to use the Right of way for light rail. A Rail line is Probably more expensive initially but it takes tires off the road if set up properly. It also reduces pollution which the EPA has a major concern with even now. What Is happens when the current Road structure gets over burdened? It will just as it has historically before.
C-33.2 ▶
C-33.3 ▶ Cobb County already has a bus system that could interchange with rail stations. Rail could remove many vehicles and it has a lot more bandwidth over time. I have been in the Atlanta area since the 80's and have seen more and more roads. Take a hint From MARTA, IT's SMARTA!

I know its late - Sorry!

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

RESPONSE

C-33.1
Your support for rail is noted. Heavy rail expansion in this corridor was one of eleven alternatives considered in the earlier Northwest Connectivity Study prepared by GRTA in 2004. It was not one of the three alternatives that advanced for further analysis in that study. The project does not preclude heavy rail in the future along the east side of I-75.

C-33.2
Your concern that the project may worsen air quality in the region is noted. However, the project is not predicted to cause or exacerbate a violation of the currently applicable National Ambient Air Quality Standards. Furthermore, it is anticipated that the project would have no measurable impact on regional Mobile Source Air Toxics levels. Please see Section 5.11 in the FEIS for further information.

C-33.3
Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling.

COMMENT C-34

Form Post from Firefox Page 1 of 1

Form Post from Firefox

an email sent by (Site Administrator) on 2 Nov 11 at 10:46pm

From: Joe Nottoli
To: nwcpcomments@projectsolvemail.com

FirstName=Joe
LastName=Nottoli
Address=1823 Tree Top Way
2ndLineAddress=Marietta, GA 30062
EmailAddress=jnottoli@jfxstudio.com
Comments=I'm against all of this.

C-34.1 ▶ HOT lanes - say no more. We PAY to use road space that we've already paid for - and continue to pay for.

C-34.2 ▶ So, we're all equal, but some are MORE equal - especially if we come with fist-fulls of cash. I-85 - how's that working for us? You people are insane - not to mention immoral and wrong. And all the rest of that govt-clarity blah-blah you wrote.... But, I got the crux of it.

But, it's all a fait accompli, we the people don't matter and you people will try to do whatever you want.

So, that's that, you know my opinion and I will fight this like hell.

- Joe Nottoli
MailingList=checkboxValue
submit=Submit

Comments

RESPONSE

C-34.1
Your opposition to tolling is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

C-34.2
The Northwest Corridor Project does not propose to convert any existing lanes to toll lanes. The proposed managed lanes are new lanes being added to the existing corridor.

Managed lanes have been a topic in the Atlanta area media recently with the opening of the I-85 Express Lanes from Chamblee-Tucker Road in DeKalb County to Old Peachtree Road in Gwinnett County. While both the Northwest Corridor Project and the I-85 Express Lanes are intended to provide increased mobility and traffic relief in two of the region's most congested corridors, the scope and operation of the two projects vary greatly.

The I-85 project converted the existing High Occupancy Vehicle (HOV) lanes, one in each direction, into High Occupancy Toll (HOT) lanes. Vehicles with three or more riders can access the lanes for free; vehicles with one or two riders can access the Express Lanes for a fee. To use the I-85 Express Lanes, motorists must register for a Peach Pass account and obtain a transponder. Users may switch between a toll and a toll-free status, depending on their vehicle's occupancy, prior to their use of the lanes.

Some of the key differences between the I-85 project and the NWCP include:

- NWCP adds additional lanes to I-75 and I-575. Two new lanes would be added to I-75 between I-285 and I-575. One new lane would be added to I-75 between I-575 and north of Hickory Grove Road, and one new lane would be added to I-575 between I-75 and Sixes Road. The project does not convert or change any of the existing lanes on I-75 or I-575.

COMMENT C-34 (con't)

This space is intentionally blank.

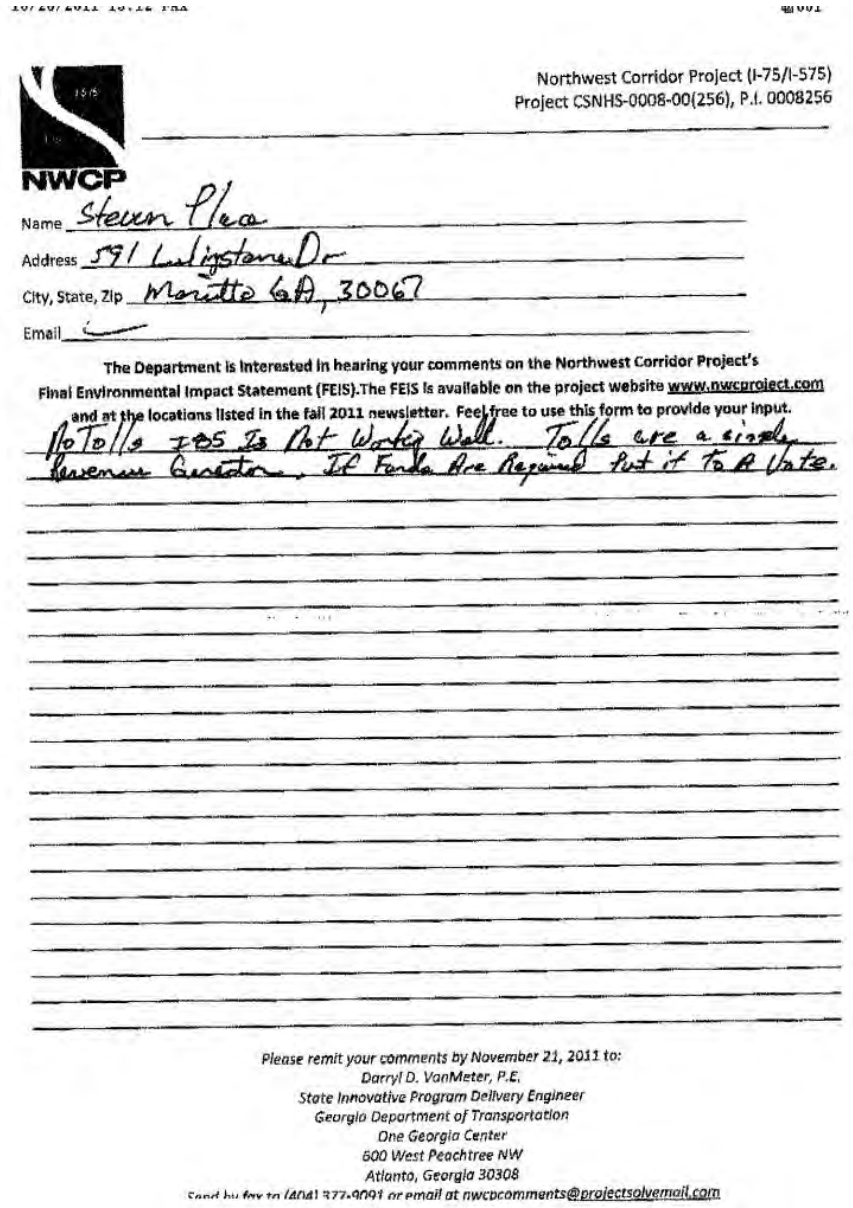
RESPONSE

The reversible feature would help minimize traffic congestion in the direction with the most demand, e.g. southbound in the morning commute period and northbound in the afternoon commute period.

- NWCP utilizes dedicated entrance and exit points on I-75. Six new managed lane interchanges are proposed on I-75. This would provide system-only access to and from the managed lanes to local streets, eliminating the need to cross over multiple lanes of traffic to enter or exit the system. The access locations would be separate from the general purpose interchanges. For I-575, users will continue to use the existing interchanges to enter and exit I-575, and access the managed lanes through three new pairs of slip ramps.
- NWCP is barrier separated. The managed lanes system is separate from the existing I-75 and I-575 facilities, allowing enforcement of proper use of the lanes and management of incidents such as traffic accidents and vehicle breakdowns.
- NWCP will toll all users. All motorists, regardless of how many passengers are in the car would be charged the same toll rate (excluding registered transit vehicles, military vehicles, emergency vehicles and school buses). Motorcycles must pay the toll to use the NWCP.
- NWCP is a Public Private Partnership (P3) project. Final design and construction of the project will be conducted with private industry partners, which will greatly expand the options for innovative technology and funding.

Tolls for the Northwest Corridor Project will be collected electronically and toll amounts will vary by time of day and congestion level. Users will have the opportunity to pay by transponder or by license plate. Registration for a Peach Pass account will not be required, though existing Peach Pass account holders will be able to utilize their transponders to access the facility.

COMMENT C-35



Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

Name Steven Plea
Address 591 Livingstone Dr
City, State, Zip Marietta GA, 30067
Email

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-35.1 No Tolls I-85 Is Not Working Well. Tolls are a single Revenue Generator, If Funds Are Required Put it To A Vote.

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

RESPONSE

C-35.1
Your opposition to tolling is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

Managed lanes have been a topic in the Atlanta area media recently with the opening of the I-85 Express Lanes from Chamblee-Tucker Road in DeKalb County to Old Peachtree Road in Gwinnett County. While both the Northwest Corridor Project and the I-85 Express Lanes are intended to provide increased mobility and traffic relief in two of the region's most congested corridors, the scope and operation of the two projects vary greatly.

The I-85 project converted the existing High Occupancy Vehicle (HOV) lanes, one in each direction, into High Occupancy Toll (HOT) lanes. Vehicles with three or more riders can access the lanes for free; vehicles with one or two riders can access the Express Lanes for a fee. To use the I-85 Express Lanes, motorists must register for a Peach Pass account and obtain a transponder. Users may switch between a toll and a toll-free status, depending on their vehicle's occupancy, prior to their use of the lanes.

Some of the key differences between the I-85 project and the NWCP include:

- NWCP adds additional lanes to I-75 and I-575. Two new lanes would be added to I-75 between I-285 and I-575. One new lane would be added to I-75 between I-575 and north of Hickory Grove Road, and one new lane would be added to I-575 between I-75 and Sixes Road. The project does not convert or change any of the existing lanes on I-75 or I-575. The reversible feature would help minimize traffic congestion in the direction with the most demand, e.g. southbound in the morning

COMMENT C-35 (con't)	RESPONSE
This space is intentionally blank.	commute period and northbound in the afternoon commute period. • NWCP utilizes dedicated entrance and exit points on I-75. Six new managed lane interchanges are proposed on I-75. This would provide system-only access to and from the managed lanes to local streets, eliminating the need to cross over multiple lanes of traffic to enter or exit the system. The access locations would be separate from the general purpose interchanges. For I-575, users will continue to use the existing interchanges to enter and exit I-575, and access the managed lanes through three new pairs of slip ramps. • NWCP is barrier separated. The managed lanes system is separate from the existing I-75 and I-575 facilities, allowing enforcement of proper use of the lanes and management of incidents such as traffic accidents and vehicle breakdowns. • NWCP will toll all users. All motorists, regardless of how many passengers are in the car would be charged the same toll rate (excluding registered transit vehicles, military vehicles, emergency vehicles and school buses). Motorcycles must pay the toll to use the NWCP. • NWCP is a Public Private Partnership (P3) project. Final design and construction of the project will be conducted with private industry partners, which will greatly expand the options for innovative technology and funding. Tolls for the Northwest Corridor Project will be collected electronically and toll amounts will vary by time of day and congestion level. Users will have the opportunity to pay by transponder or by license plate. Registration for a Peach Pass account will not be required, though existing Peach Pass account holders will be able to utilize their transponders to access the facility. It is not anticipated that the tolls will exceed the cost of operating and maintaining the facility and paying off the debt associated with the

COMMENT C-35 (con't)	RESPONSE
	construction of the project. It is important to note that variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. The State Road and Tollway Authority's authorization to toll was granted by the Georgia Legislature and dates to 1953.

This space is intentionally blank.

COMMENT C-36	RESPONSE

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

Name GLENN RAUH

Address 841 WOODMONT Dr

City, State, Zip MARIETTA GA 30062

Email GRAUH1@AOL.COM

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS).The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-36.1 HOPE SOMETHING IN WAY OF PUBLIC TRANSIT TO AND FROM H-J AIRPORT. SOMETHING (BUS) FROM PARK RIDE'S IS AN IDEA.

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-36.1
Cobb Community Transit (CCT) currently provides bus transit on I-75 from Cobb County to MARTA heavy rail stations in Atlanta. The MARTA heavy rail system provides connection to the Hartsfield-Jackson Atlanta International Airport. For example, CCT Route 101 (Marietta Express) begins at the Marietta Park and Ride lot on South Marietta Parkway and runs non-stop to the MARTA Civic Center station. The Preferred Alternative is supportive of mass transit in that the managed lanes will be congestion-free and transit vehicles will be allowed to use the managed lanes without paying a toll. The project also does not preclude rail transit in the future within the I-75 corridor.

COMMENT C-37

RESPONSE

11/15/2011 15:15 7705908747 PAULROBINSN PAGE 01/02

NWCP

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

Name PAUL ROBINSON
Address 2161 KINGSTON CT
City, State, Zip MARIETTA, GA 30067
Email Paul@PAULROBINSONINC.COM

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS). The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

ONE REQUEST.

C-37.1 WHY BUILD METAL SOUND BARRIERS (WALLS), WHY NOT PLANT EVERGREEN LEYLAND CYPRESS TREES. THEY ARE ATTRACTIVE AND ABSORB NOISE, METAL WALLS ARE TOTAL WASTE OF TAXPAYERS DOLLARS.

PLEASE LET ME KNOW YOUR THOUGHTS.

SINCERELY, COULD NOT MAKE THE MEETINGS ON THE WALLS
Paul Robenson

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcacomments@projectsolvemail.com

C-37.1
As noted in Environmental Commitment 12 in the FEIS, context-sensitive aesthetic finishes will be used on structural retaining walls and noise walls.

As noted in the Georgia Department of Transportation's Highway Noise Abatement Policy, the planting of vegetation or landscaping is not an acceptable noise abatement measure since only dense stands of mature evergreen vegetation at least 100 feet deep would noticeably reduce noise levels.

COMMENT C-38	RESPONSE

Please Add Sound Barrier Page 1 of 1

Please Add Sound Barrier

an email sent by (Site Administrator) on 21 Nov 11 at 10:55am

From: John Shearrow
To: nwcpcomments@projectsolvemail.com

To whom it may concern:

C-38.1 It has come to my attention the expansion of 75 will significantly increase the noise my street currently deals with. However, a sound barrier for our street has not been included in the plans. This is unacceptable. The additional noise will severely impact the well being of my street and I request that it be added.

My street is Manuel Drive, Marietta, GA 30066

Regards,

John

Comments

C-38.1

The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in Section 5.12, Appendix F and the Noise Technical Report of the FEIS. Preliminary noise walls are shown in Appendix H in Volume 2 of the FEIS. The noise analysis indicates that existing noise levels in the vicinity of Manuel Drive range from 63.0 dBA – 75.8 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.1 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 69.1 dBA – 78.0 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would not be cost effective. That is, the cost of a barrier would exceed the maximum cost allowable of $55,000 per benefitted receptor. Therefore, a noise wall is not proposed at this location.

The noise abatement evaluated at these locations is based upon preliminary noise analyses and design criteria.

A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the noise abatement will be reconsidered and might be provided based on additional public involvement.

The final locations and heights will not be established until final design. Property owners located behind proposed noise walls will be contacted to determine if there is a consensus to construct a particular noise wall or not.

COMMENT C-39	RESPONSE

I-75 / I-575 Northwest Corridor Project

an email sent by (Site Administrator) on 12 Nov 11 at 10:52pm

From: Rsifen@aol.com
To: nwcpcomments@projectsolvemail.com

C-39.1 ▶ The plan for the I-75 / I-575 Northwest Corridor Project is fantastic.

* It will effectively reduce traffic congestion.
* It is a cost-effective project for taxpayers.
* This plan will cause only brief problems with traffic delays caused by construction.
* NWC Project will cost-effectively bring tremendous traffic congestion relief on one of the most congested corridors in the country. It is a true win-win.

C-39.2 ▶ Please implement higher premium pricing in the toll lanes ONLY when the toll lanes are becoming too congested, and NOT based on increasing congestion in the general purpose lanes. The best way to assure acceptance and utilization in a region that is not used to tolls is to assure that the tolls are not implemented in an oppressive manner.

Thanks

Ron Sifen

Comments

C-39.1
Your support for the Northwest Corridor Project is noted.

C-39.2
The tolling algorithm would be based on vehicle speeds in the managed lanes, not the general purpose lanes. The tolls would be set to maintain a minimum average speed of 45 mph in the managed lanes.

COMMENT C-40	RESPONSE

Please add me to your mail list for this project Page 1 of 1

Please add me to your mail list for this project
an email sent by (Site Administrator) on 24 Oct 11 at 1:02pm

From: Mark Telling
To: <nwcpcomments@projectsolvemail.com>

C-40.1

Thank you,

Mark S. Telling, CPA
Director of Finance
The Clean Air Campaign, Inc.
55 Park Place, NE Suite 250
Atlanta, GA 30303
P. 678.244.7725
F. 678.244.7740

Comments

Attachments

C-40.1
Added to mailing list.

COMMENT C-41	RESPONSE

NWC Reserach Page 1 of 1

NWC Reserach
an email sent by (Site Administrator) on 2 Nov 11 at 1:20pm

From: Laura Ann Thompson
To: <nwcpcomments@projectsolvemail.com>

C-41.1

Good afternoon,
My name is Laura Ann Thompson, and I am conducting research for a planning project. Is there a master timeline/status sheet for the Northwest Corridor project?
Thank you for your help,
Laura Ann

Laura Ann Thompson
JACKSON SPALDING
Image Creation, Cultivation and Communication
P 404-214-2199
M 931-607-7151
E lthompson@jacksonspalding.com
W jacksonspalding.com

Go behind the scenes at Jackson Spalding!
On twitter | On facebook | Our blog

We are a member of Public Relations Organisation International (PROI)

Comments

C-41.1
Construction is scheduled to begin in 2014.

COMMENT C-42

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

NWCP

Name Dave R. Trace

Address 761 Earl St.

City, State, Zip Marietta, Ga. 30067

Email —

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS).The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-42.1 When a light rail system is installed it should extend all the way to Suwanee not to Cumberland Mall.

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

RESPONSE

C-42.1
Your support for light rail between Atlanta and Chattanooga is noted. As the light rail technology operates at average running speeds of 20-25 mph, light rail would not be an effective technology to cover the distance between Atlanta and Chattanooga. High-speed regional rail is being studied between Atlanta and Chattanooga. However, this project, the Northwest Corridor Project, is a separate project with its own need and purpose.

COMMENT C-43	RESPONSE

Moses, Robert

From: Kristine Hansen-Dederick [hansen-dederick@sycamoreconsulting.net]
Sent: Tuesday, November 22, 2011 12:33 AM
To: Moses, Robert; keijackson@dot.ga.gov
Subject: Fw: NWCP survey
Attachments: NWCPSrvy.doc

Connected by DROID on Verizon Wireless

-----Original message-----
From: Sundra Vann <svanncpa@yahoo.com>
To: "hansen-dederick@sycamoreconsulting.net" <hansen-dederick@sycamoreconsulting.net>
Cc: "jenprice@sycamoreconsulting.net" <jenprice@sycamoreconsulting.net>
Sent: Tue, Nov 22, 2011 04:49:17 GMT+00:00
Subject: NWCP survey

C-43.1 ▶ Please point me to where I can find additional details regarding environmental justice impact. The exec summary indicates
disproportionate and adverse impacts due to property acquisition in minority and low-income neighborhoods.

C-43.2 ▶ I am also interested in future plans to maintain landscaping along I575 and minimize noise effect to the neighborhoods along the corridor.

1

C-43.1
Users of the general-purpose lanes are also expected to experience travel time savings. Transit vehicles will be able to travel in the uncongested managed lanes without paying a toll.

C-43.2
The proposed managed lanes on I-575 will be in the median of the existing interstate. The Georgia Department of Transportation will continue to maintain the landscaping in the I-575 corridor.

The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in Section 5.12, Appendix F and the Noise Technical Report of the FEIS. Preliminary noise walls are shown in Appendix H in Volume 2 of the FEIS.

COMMENT C-44	RESPONSE

NW corridor project (2) Page 1 of 1

NW corridor project (2)

an email sent by (Site Administrator) on 21 Nov 11 at 10:15am

From: Pamela Whitlow
To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com>

C-44.1 ▶ my comment on this subject would be against HOT lanes for I75 and I575. I drive 575 every day to and from Marietta to go to work in Canton, Cherokee County

C-44.2 ▶ I have been lucky enough to travel in Europe by trains and am so confused as to why we in Marietta, Cobb County, Atlanta, GA are soooo resistant to developing train system. This is in my mind the ONLY solution to the heavy car pollution and heavy traffic congestion getting from all north counties down to Marietta and on to either 285 or south I75.

again, my recommendation is to use train system. Trains are the best way to go to cut back on heavy traffic by all the automobiles.

thank you.

resident of Marietta, Cobb County since 1984

Pam Whitlow
716 Twin Brooks Court
Marietta, GA 30067

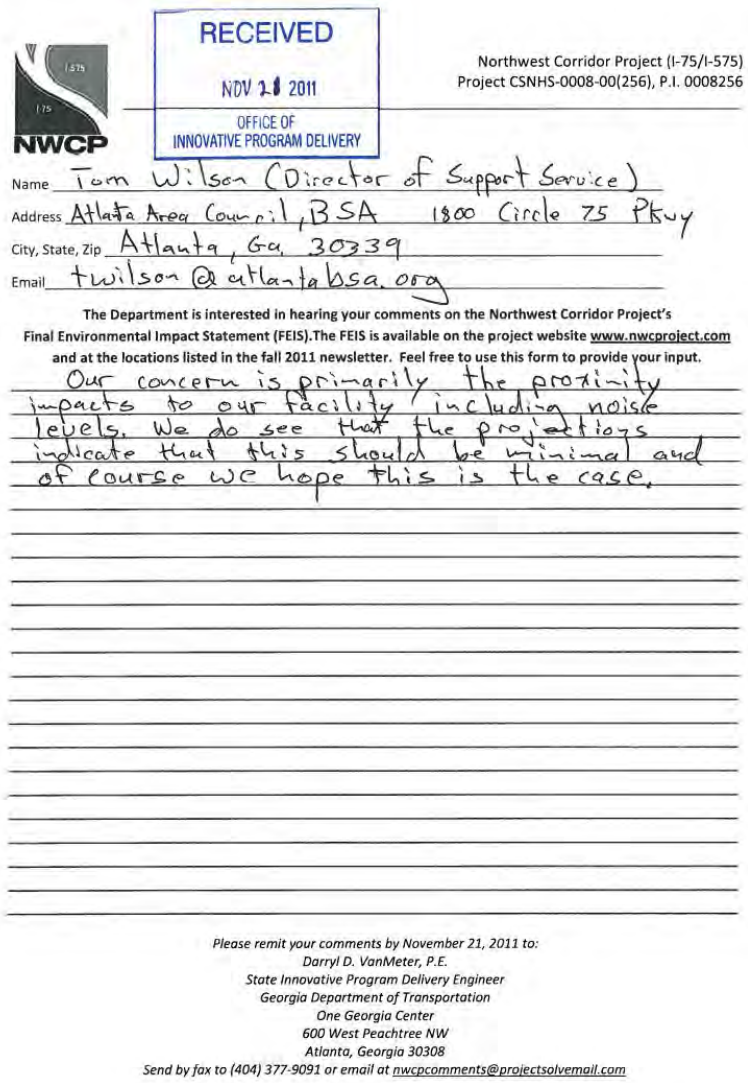
Comments

C-44.1
Your opposition to high occupancy toll (HOT) lanes is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. And by allowing single-occupant vehicles to use the lanes if they pay a toll, the managed lanes should not experience the "empty lane syndrome" that HOV lanes often experience. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

C-44.2
Your support for rail is noted. Heavy rail expansion in this corridor was one of eleven alternatives considered in the earlier Northwest Connectivity Study prepared by GRTA in 2004. It was not one of the three alternatives that advanced for further analysis in that study. The project does not preclude heavy rail in the future within the I-75 corridor.

COMMENT C-45

RESPONSE



RECEIVED
NOV 21 2011
OFFICE OF
INNOVATIVE PROGRAM DELIVERY

NWCP

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256

Name Tom Wilson (Director of Support Service)
Address Atlanta Area Council, BSA 1800 Circle 75 Pkwy
City, State, Zip Atlanta, Ga. 30339
Email twilson@atlantabsa.org

The Department is interested in hearing your comments on the Northwest Corridor Project's Final Environmental Impact Statement (FEIS).The FEIS is available on the project website www.nwcproject.com and at the locations listed in the fall 2011 newsletter. Feel free to use this form to provide your input.

C-45.1 Our concern is primarily the proximity impacts to our facility including noise levels. We do see that the projections indicate that this should be minimal and of course we hope this is the case.

Please remit your comments by November 21, 2011 to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW
Atlanta, Georgia 30308
Send by fax to (404) 377-9091 or email at nwcpcomments@projectsolvemail.com

C-45.1
The Project Team has analyzed the noise associated with existing and proposed conditions at the Service Center property. As a result of a Value Engineering Study, it was decided to reduce the three-lane wide ramp shown in the SDEIS to a two-lane ramp, and instead of taking both lanes over Windy Ridge Parkway, to split the ramp and take one lane over Windy Ridge Parkway and one lane under Windy Ridge Parkway. This revised alignment is shown in Volume 2 of the FEIS. This revision was incorporated into the noise model. In Table F.6-1 on page F-78 of the FEIS, the information from the noise receptor placed in the vicinity of the Service Center is presented. The receptor identification number is 340. You can see from this Table the existing exterior noise level is currently 70.2 decibels and the projected noise level for the No-Build condition in 2035 is 72.9 decibels. The predicted exterior noise level for the Build Alternative in 2035 is 73.7 decibels. Potential mitigation through construction of a noise wall was investigated, but the site would exceed the maximum allowable cost criteria of $55,000 per benefitted receptor. Therefore, a noise wall is not proposed at this location.

2012 ADDITIONAL OUTREACH COMMENTS AFTER FEIS

COMMENT C-46	RESPONSE

NWCP NORTHWEST CORRIDOR PROJECT

I 75

an email sent by (Site Administrator) on 25 Aug 12 at 5:58am

From: Deana Burns
To: nwcpcomments@projectsolvemail.com

WE NEED MORE LANES *NOT* PAY LANES!

Comments

C-46.1
Your opposition to high occupancy toll (HOT) lanes is noted. Variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. And by allowing single-occupant vehicles to use the lanes if they pay a toll, the managed lanes should not experience the "empty lane syndrome" that HOV lanes often experience. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

COMMENT C-47	RESPONSE

Northwest Corridor ROW & Let Dates

an email sent by (Site Administrator) on 20 Jun 12 at 10:49am

From: Maren Franzen
To: <GeorgiaP3NWC@dot.ga.gov>, <nwcpcomments@projectsolvemail.com>

To whom it may concern:

Pursuant to our telephone conversation today, attached please find an open records request, dated June 20, 2012.

C-47.1 ▶ If you have any questions, please do not hesitate to contact me. Thank you so much for your time and assistance.

Sincerely,

Maren Franzen
Biersdorf & Associates, P.A.
33 South Sixth Street, Suite 4100
Minneapolis, MN 55403
Office: (866) 339.7242
Fax: (612) 339.0585

C-47.1
The FHWA and GDOT appreciate your interest in the Northwest Corridor Project and your comments.

The FHWA will continue to evaluate the project and will consider public comments. Upon completion of the evaluation, FHWA will issue a Record of Decision (ROD). The ROD states what the decision is for the project and is the final step for agencies in the EIS process.

Once it is issued you may view the ROD on the Project website at www.nwcproject.com. You may also request a DVD of the ROD and additional content through the "Contact Us" tab on the website; by calling our Voice Mail Hotline at (404) 377-4012 or emailing us at nwcpcomments@projectsolvemail.com.

(Also see related comments/responses to C-48 and C-49)

COMMENT C-48	RESPONSE

Northwest Corridor Project (3)
an email sent by (Site Administrator) on 18 Jun 12 at 4:31pm

From: Maren Franzen
To: <GeorgiaP3NWC@dot.ga.gov>, <nwcpcomments@projectsolvemail.com>

To whom it may concern:

C-48.1 ▶ Is this project currently fully funded? Are all funds secured? When do you anticipate the project to begin? Specifically, when do you anticipate Right of Way acquisition to begin?

If you have any questions, please do not hesitate to contact me. Thank you so much for your time and assistance.

Sincerely,

Maren Franzen
Biersdorf & Associates, P.A.
33 South Sixth Street, Suite 4100
Minneapolis, MN 55403
Office: (866) 339.7242
Fax: (612) 339.0585

C-48.1
The PLAN 2040 Regional Transportation Plan and the FY 2012-2017 Transportation Improvement Program (TIP) details the source of funds for this project. PLAN 2040 was adopted by the Atlanta Regional Commission on July 27, 2011, approved by the Georgia Regional Transportation Authority on August 18, 2011, and the FHWA issued a conformity determination on September 6, 2011.

Right of way acquisition is scheduled to begin in 2013. Construction is scheduled to begin in 2014.

(Also see related comments/responses to C-47 and C-49)

COMMENT C-49

RESPONSE

BIERSDORF & ASSOCIATES

Your Source for Eminent Domain Law

2 Ravinia Drive, Suite 650
Atlanta, Georgia 30346
Toll Free: (866) 339-7242
www.condemnation-law.com
info@condemnation-law.com

June 20, 2012

Chip Meeks, P3 Administrator
Georgia Department of Transportation
One Georgia Center
600 West Peachtree Street, 19th Floor
Atlanta, GA 30308

Re: Open records request

Mr. Meeks:

C-49.1 ▶ Pursuant to Georgia open records law, Ga. Code Ann. Secs. 50 18 70 to 50 18 77, I write to request a timeline/schedule for the State Transportation project **TIA CO 035, US 41/I 75 Northwest Corridor High Capacity Transit Improvements**; specifically, I request Right of Way acquisition and Let dates for the referenced project.

Please be advised, I am not interested in the documents if ROW is complete or if ROW is not required for a project. If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address.

Per Georgia § 50-18-7(c), I agree to pay reasonable copying fees of not more than 0.25 cents per page and pursuant to Georgia § 50-18-7(d), I agree to pay the reasonable charge for the search, retrieval and other direct administrative costs, not exceed the salary of the lowest paid full-time employee who, in the discretion of the custodian of the records, has the necessary skill and training to perform the request; provided, however, that no charge shall be made for the first quarter hour. Lastly, I agree to pay for reasonable postage fees, if necessary. If the costs of this request are greater than $50, please notify me prior to completing request. Please provide a receipt indicating the charges for each document.

If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. Also, please provide all segregable portions of otherwise exempt material.

Please be advised that I am prepared to pursue whatever legal remedy necessary to obtain access to the requested records. I would note that willful violation of the open records law can result in a fine of up to $100 and the award of reasonable attorney fees and other costs of litigation.

The contact for this matter is **Maren Franzen**, available by email at **Maren@condemnation-law.com**, or via phone at Toll Free (866) 339-7242, fax (612) 339-0585. For the fastest response to any questions, contact her via email or fax. We prefer that copies of documents be sent to our research headquarters at 33 South Sixth Street, Suite 4100, Minneapolis MN 55402, attn: Maren Franzen.

Sincerely,

Biersdorf & Associates

Licensed in and providing ongoing service in the following states:
New York • Pennsylvania • Florida • Texas • Minnesota • Wisconsin • Indiana • Virginia • Oklahoma • West Virginia
South Carolina • Iowa • Georgia • Ohio • Idaho • North Carolina • Colorado • Washington • Michigan

C-49.1
The procurement of the Project was cancelled on December 14, 2011 in order for the State to examine other available options for the delivery of the Project. The State has now identified a delivery method that will allow it to retain operational, maintenance, tolling and long-term financing responsibilities while maintaining flexibility to provide transportation solutions in the corridor, as may be needed, now and in the future. FHWA is in the process of completing the environmental evaluation. The Right of way acquisition is scheduled to begin in 2013. Construction is scheduled to begin in 2014.

(Also see related comments/responses to C-47 and C-48)

COMMENT C-50

Kristine Hansen-Dederick

From: GHEA, JUDY L <jg8850@att.com>
Sent: Friday, June 29, 2012 11:36 AM
To: Kristine Hansen-Dederick
Subject: QUESTION: Georgia DOT Northwest Corridor Project I-75/I-575

C-50.1 ▶ Thank you Kristine, it has been a while since we touched base. I own a rental property at 121 Chert Road in Marietta, and it looks like may be impacted. Can you give me a status of any impact on that property? Thank you!

From: Kristine Hansen-Dederick [mailto:hansen-dederick@sycamoreconsulting.net]
Sent: Friday, June 29, 2012 11:15 AM
To: hansen-dederick@sycamoreconsulting.net
Subject: Georgia DOT Northwest Corridor Project I-75/I-575

Hello!

Attached please find the latest project newsletter. Please note the project team will be out this evening at the Cumberland Mall from 5:00 – 9:00pm and tomorrow at Town Center Mall from 12:00 – 4:00pm. We'll be handing out newsletters and comment forms. Please stop by and let us know your thoughts!

Thank you-
Kristine

Kristine Hansen-Dederick, AICP
Sycamore Consulting, Inc.
195 Arizona Ave, Unit LW-4
Atlanta, GA 30307
P: 404-377-9147
F: 404-377-9091

RESPONSE

C-50.1
The Preferred Alternative is not anticipated to directly impact your property on the west side of Chert Road at 121 Chert Road, Marietta, GA 30062. As shown on Sheet H-8 in Appendix H of Volume 2 of the FEIS, the proposed right of way and easements needed for the Preferred Alternative stay to the east of Chert Road. A sound barrier along the east side of Chert Road is proposed as part of the Preferred Alternative though final locations and heights will not be established until final design. Property owners located behind proposed noise walls will be contacted to determine if there is consensus to construct a particular noise wall or not.

COMMENT C-51	RESPONSE

Terrell Mill/InfoMart

an email sent by (Site Administrator) on 29 Jun 12 at 1:34pm

From: Renee Harbeson
To: <nwcpcomments@projectsolvemail.com>
Cc: "Tammy Cohen" <Tammy@infomart-usa.com>, "Amy Phillips" <Amy@infomart-usa.com>

To whom it may concern:

C-51.1 ▶ InfoMart, which is located at 1582 Terrell Mill Rd. Marietta, GA 30067, is still terribly concerned with the sound barriers that are to be constructed on the highway next to our building. The issue is that our sign on top of the building (great visibility to I-75) will not be able to be seen once the sound barriers are erected.

I have been to several meetings and have not received a satisfactory response on this issue as of yet. We are extremely concerned this will be done and we will not be consulted or it will be too late if we are consulted. We would like to have solid, tangible plan in place to prevent this from happening. I would appreciate the opportunity to speak to someone about this. Thanks so much for your time.

Renee Harbeson
Paralegal
InfoMart®
770-984-2727 ext. 1217

Please don't print this e-mail unless it's really necessary

C-51.1
Your concern about proposed noise walls blocking the visibility of your property's sign is noted. While preliminary locations of noise walls can be seen in Volume 2 of the FEIS and preliminary wall heights are presented in the Noise Technical Report, final locations and heights will not be established until final design. Property owners located behind proposed noise walls will be contacted to determine if there is consensus to construct a particular noise wall or not.

COMMENT C-52	RESPONSE

Northwest Corridor Project Public Information Outreach Suggestion

an email sent by (Site Administrator) on 28 Sep 12 at 3:38pm

From: Keary Lord
To: <nwcpcomments@projectsolvemail.com>

I wanted to suggest that the project video be formatted and prepared so that each local government who has local government access channels can play the video multiple times throughout the day on their broadcasts. This may reach many viewers and the public during the public outreach process.

C-52.1 ▶ Regarding formatting: my only suggestion is to add the title of the project to the full video in case a viewer catches the video after it has already started.

Keary B. Lord
Assistant Director/Traffic Operations Division Manager
Douglas County Department of Transportation
8700 Hospital Drive
Douglasville, Georgia 30134
Phone 678.715.5372
Fax 770.920.4933
klord@co.douglas.ga.us

C-52.1
Thank you for your comment. Your suggestion regarding the project video is a good idea.

COMMENT C-53	RESPONSE

Kristine Hansen-Dederick

From: judymanning <judymanning@bellsouth.net>
Sent: Friday, June 29, 2012 12:38 PM
To: Kristine Hansen-Dederick
Subject: Re: Georgia DOT Northwest Corridor Project I-75/I-575

Categories: Red Category

This project will help! Thanks Rep. Judy Manning

From: Kristine Hansen-Dederick <hansen-dederick@sycamoreconsulting.net>
To: hansen-dederick@sycamoreconsulting.net
Sent: Fri, June 29, 2012 11:17:57 AM
Subject: Georgia DOT Northwest Corridor Project I-75/I-575

Hello!

C-53.1 ▶ Attached please find the latest project newsletter. Please note the project team will be out this evening at the Cumberland Mall from 5:00 – 9:00pm and tomorrow at Town Center Mall from 12:00 – 4:00pm. We'll be handing out newsletters and comment forms. Please stop by and let us know your thoughts!

Thank you-
Kristine

Kristine Hansen-Dederick, AICP
Sycamore Consulting, Inc.
195 Arizona Ave, Unit LW-4
Atlanta, GA 30307
P: 404-377-9147
F: 404-377-9091

C-53.1
Thank you for your comment.

COMMENT C-54	RESPONSE

Kristine Hansen-Dederick

From: Rube McMullan <rubemc@att.net>
Sent: Friday, June 29, 2012 11:40 AM
To: Kristine Hansen-Dederick
Subject: Re: Georgia DOT Northwest Corridor Project I-75/I-575

Categories: Red Category

C-54.1 ▶ Thanks for the update info. On the "Summary of Environmental Impacts", is there a list of the properties being taken? I own much of the property along I-75 at the South Loop on both sides of the interstate. Thanks. Rube McMullan

McMullan Properties

870 Old Canton Rd

Marietta, GA 30068\

RubeMc@att.net

(770) 977-1852-office

(404)372-5523-cell

(770) 971-3057-fax

C-54.1
The proposed right of way and easements needed for the Preferred Alternative are shown in Appendix H of Volume 2 of the FEIS.

The anticipated project displacements are listed in the Conceptual Stage Study in the FEIS. The Preferred Alternative is expected to displace six (6) single-family homes: 1312 Kasandra Drive, Marietta, GA 30067; 1295 Kasandra Drive, Marietta, GA 30067; 1287 Kasandra Drive, Marietta, GA 30067; 120 Chert Road Marietta, GA 30062; 130 Chert Road Marietta, GA 30062; and 160 Dickson Court, Marietta, GA 30066. The Preferred Alternative is expected to displace twelve (12) businesses: Marcee's Towing Service at 121 Freys Gin Road, Marietta, GA 30067; Underpriced Cars at 35 Freys Gin Road, Marietta, GA 30067; Powermax Fitness, Prime American Corp., Varner & Varner, VPI Corporation, Dr. Thomas Vangalder, DDS; and Savage & Company at 1200 Roswell Road, Marietta, GA 30062; Chicago Delights at 1199 Roswell Road, Marietta, GA 30062; Tractor Trailer Parking Lot on Chert Road, Marietta, GA 30062; TrailersPlus at 100/110 Chert Road, Marietta, GA 30062; and Church's Chicken at 1130 Roswell Road, Marietta, GA 30062.

As shown on Sheet H-7 in Appendix H of Volume 2 of the FEIS, in the vicinity of South Marietta Parkway the Preferred Alternative will be located on the west side of existing I-75, and some right of way and easements are anticipated to be needed. In the Preferred Alternative the existing sound barrier on the east side of I-75 south of South Marietta Parkway will be replaced with a longer and taller sound barrier wall though no right of way or easement is anticipated to be needed for its construction. However, final locations and heights of sound barriers will not be established until final design. Property owners located behind proposed noise walls will be contacted to determine if there is consensus to construct a particular noise wall or not.

COMMENT C-55	RESPONSE
C-55.1 ▶  **Email List** an email sent by (Site Administrator) on 11 Oct 12 at 9:19am From: Seth Millican To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com> To Whom it May Concern, Could you please add me to the email update list for the NWC Project? THanks! SM James Seth Millican | Brock Clay Government and Public Affairs | 49 Atlanta Street | Marietta, GA | 30060 | p (770) 715 - 2657 | f (770) 426 - 6155 | brockclaygpa.com | Linkedin | Brock Clay Blo | Facebook | Emergent Guys Blog | Twitter - Smillican	C-55.1 Added to mailing list.

COMMENT C-56	RESPONSE
 **I 75 abd 575 Northwest Corridor Project** an email sent by (Site Administrator) on 29 Jun 12 at 9:41pm From: Michael Moody To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com> C-56.1 ▶ I have finally been able to understand what side of I-75 the Northwest Corridor will be developing. This will definitely have the least impact on Residential and will be a great help with traffic running North and South The sooner we can get this project in play the better for all concerned in and around I-75 and 575. Michael Moody	C-56.1 Thank you for your comments.

COMMENT C-57	RESPONSE

FYI - Mailed Received From Your Company!

an email sent by (Site Administrator) on 30 Jul 12 at 9:49am

From: Lisa Nelson
To: "nwcpcomments@projectsolvomail.com" <nwcpcomments@projectsolvomail.com>

Good Day:

C-57.1 ▶ We received mail today for the below Broker's who are no longer with our company:

John Poulos

Please see our attached updated broker list.

Lisa Nelson
Office Manager
UGL Equis
3500 Lenox Road | Suite 750
Atlanta GA | 30347
Direct 404 504 5852
Fax 404 264 0500
lisa.nelson@ugl-equis.com
Please consider the environment before printing this e-mail.

C-57.1
Mailing list updated.

COMMENT C-58	RESPONSE

CUMBERLAND
COMMUNITY IMPROVEMENT DISTRICT

November 28, 2011

Mr. Glenn Bowman
State Environmental Administrator
Georgia DOT
One Georgia Center
600 West Peachtree NW, 27th Floor
Atlanta, GA 30308

Dear Mr. Bowman:

Thank you for your October 17, 2011 letter regarding the proposed I-75/575 Reversible Lane Project. We appreciate your consideration and review of our suggestions and concerns of the project.

C-58.1 ▶ We continue to have a considerable interest in this project and how it impacts our member property owners and taxpayers and would like to remain involved.

I look forward to additional engagement with Georgia DOT on this project.

Sincerely,

Malaika Rivers
Executive Director

cc: Tad Leithead, CID Chairman
Bob Ott, Cobb County Commission District 2
Faye DiMassimo, Cobb DOT
Darryl Van Meter, State Innovative Delivery Engineer, Georgia DOT

C-58.1
Thank you for your comments.

COMMENT C-59

Kristine Hansen-Dederick

From: Pamela Whitlow <pcwhitlow22@yahoo.com>
Sent: Friday, June 29, 2012 1:43 PM
To: Kristine Hansen-Dederick
Subject: Re: Georgia DOT Northwest Corridor Project I-75/I-575

Categories: Red Category

C-59.1 ▶

can you tell me the location of the 5-6 residential and 12 businesses on west side of Marietta by street name and/or business name if possible that are going to be affected by this NW project.
thanks for your information.
Pam Whitlow
resident of Twin Brooks townhouses on Franklin Road

From: Kristine Hansen-Dederick <hansen-dederick@sycamoreconsulting.net>
To: hansen-dederick@sycamoreconsulting.net
Sent: Friday, June 29, 2012 11:15 AM
Subject: Georgia DOT Northwest Corridor Project I-75/I-575

Hello!

Attached please find the latest project newsletter. Please note the project team will be out this evening at the Cumberland Mall from 5:00 – 9:00pm and tomorrow at Town Center Mall from 12:00 – 4:00pm. We'll be handing out newsletters and comment forms. Please stop by and let us know your thoughts!

Thank you-
Kristine

Kristine Hansen-Dederick, AICP
Sycamore Consulting, Inc.
195 Arizona Ave, Unit LW-4
Atlanta, GA 30307
P: 404-377-9147
F: 404-377-9091

RESPONSE

C-59.1
The anticipated project displacements are listed in the Conceptual Stage Study in the FEIS. The Preferred Alternative is expected to displace six (6) single-family homes: 1312 Kasandra Drive, Marietta, GA 30067; 1295 Kasandra Drive, Marietta, GA 30067; 1287 Kasandra Drive, Marietta, GA 30067; 120 Chert Road Marietta, GA 30062; 130 Chert Road Marietta, GA 30062; and 160 Dickson Court, Marietta, GA 30066. The Preferred Alternative is expected to displace twelve (12) businesses: Marcee's Towing Service at 121 Freys Gin Road, Marietta, GA 30067; Underpriced Cars at 35 Freys Gin Road, Marietta, GA 30067; Powermax Fitness, Prime American Corp., Varner & Varner, VPI Corporation, Dr. Thomas Vangalder, DDS; and Savage & Company at 1200 Roswell Road, Marietta, GA 30062; Chicago Delights at 1199 Roswell Road, Marietta, GA 30062; Tractor Trailer Parking Lot on Chert Road, Marietta, GA 30062; TrailersPlus at 100/110 Chert Road, Marietta, GA 30062; and Church's Chicken at 1130 Roswell Road, Marietta, GA 30062.

COMMUNITY NOISE COMMENTS

NOVEMBER 2011

COMMENT C-60	RESPONSE
MS. HARBESON: My name is Renee Harbeson. I'm with a company called Infomart, located at 1582 Terrell Mill Road, Marietta, Georgia 30067. We're located at Terrell Mill at the overpass for 75. We have two concerns with the project; one being the sound barrier, I've been told to be twenty-two feet high. We have invested in a sign on our building that is visible from 75 and we are afraid that that will be blocked. Our next door neighbor, Reform Theological Seminary also has invested in a sign, and they have similar concerns. That's it.	C-60.1 Your concern about proposed noise walls blocking the visibility of your property's sign is noted. While preliminary locatiosn of noise walls can be seen in Volume 2 of the FEIS and preliminary wall heights are presented in the Noise Technical report, final locations and heights will not be established until final design. Property owners located behind the proposed noise walls will be contacted to determine if there is consensus to construct a particular noise wall or not. (See Comment/Response C-51.1)

C-60.1 ▶

COMMENT C-61	RESPONSE
MR. SIFEN: Ron Sifen, 3122 Vinings Ridge Drive, Atlanta 30339. And I think this is probably the best project that GDOT has anywhere in the state. C-61.1 ▶ This project is cost effective and will deliver traffic congestion relief. And that's what this region needs is -- we do have a traffic congestion problem. We need projects that will effectively alleviate traffic congestion, and the project itself is cost effective. As far as I'm concerned, this project is spectacular in every possible way. Thank you.	C-61.1 Thank you for your comments.

COMMENT C-62	RESPONSE

MR. WOOD: My name is Michael Wood. I live at 70 Manuel Drive, Marietta, Georgia 30066, and my phone number is 770-833-8785. And the comment I have, I live right beside I-75, the proposed expansion, and I have learned tonight that our neighborhood is not being considered for a sound barrier of any kind.

And I'd just, I guess, like to state that I've lived there for 30-something years, and when I bought the house, there was no noise problem at all. And it is -- every time the road is widened, the sound gets worse and much louder. And I would just like for that area to be reconsidered for a sound barrier of some sort.

C-62.1 ▶

C-62.1
Sound wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that the cost of constructing a wall at this location would exceed the maximum cost allowable of $55,000 per benefitted receptor. Therefore, a noise wall is not proposed at this location.

The noise abatement evaluated at these locations is based upon preliminary noise analyses and design criteria.

A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the noise abatement will be reconsidered and might be provided based on additional public involvement.

COMMENT C-63

MS. SIMMS: My name is Eileen Simms, and my address is 566 Kurtz Road, Marietta, Georgia 30066. What I would like to mention is I live east of 75 where Bells Ferry Road crosses under 75. And I understand that noise barriers will be put up on the west side but not on the east side. And I was told that the noise would not be reflected over to the east side, but it only makes sense that if there's a barrier up on the west side and the noise hits it,

it's going to reflect back. And I think it's going to make even more noise on the east side.

We have needed barriers for years on the east side. There's a company that sells stone over there at that intersection and they cut down all the trees on their property, and I think some of them on the right of way for the expressway, and since then, we've have had an enormous amount of noise. And from what the gentlemen over here were telling me from where they were looking, my house is about two miles away from the expressway, so that's quite a distance away to be having all that kind of noise.

And I would just like them to reconsider please putting in the noise barrier. I know they were saying that they had to have so many houses within so many feet, but if it's two miles away and it's still causing a lot of trouble, that's a big problem.

And that's about all I have to say.

RESPONSE

C-63.1

Noise wall #37 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would not be feasible. That is, none of the impacted receptors would receive reduction in noise levels of 5 dBA or more with a noise wall. Noise wall #10-11 in the vicinity of Bells Ferry Road on the west side of I-75 was analyzed, but was found to be not cost effective. Therefore, as currently designed, traffic noise would not be reflected from a noise wall on the west side back across to the east side of I-75.

The noise abatement evaluated at these locations is based upon preliminary noise analyses and design criteria. A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the noise abatement will be reconsidered and might be provided based on additional public involvement.

The final locations and heights will not be established until final design. Property owners located behind proposed noise walls will be contacted to determine if there is a consensus to construct a particular noise wall or not.

COMMENT C-64	RESPONSE
MR. HOVEY: My name is Bob Hovey. I live near Marietta. And my question is: How are they C-64.1 ▶ going to bring the new light rail track through this design at the intersection of 75 and 285? I think that there's going to be a conflict and a competition for right of way between the train and this project. That's my question.	C-64.1 Light rail is one of several alternatives being studied by Cobb County. If light rail were selected as the preferred alternative, and if the route chosen were to come through the I-75 / I-285 interchange, there are opportunities for co-existence of rail with the existing and proposed roadways in the existing interstate right of way. The Northwest Corridor Project does not preclude future transit in the corridor.

COMMENT C-65

RESPONSE

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256
November 2011 Community Noise Meeting

Name Carol Brown

Address 2181 Lesslie Manor Dr

City, State, Zip Marietta, GA 30064

Email carolbrwn5@gmail.com

The Department is interested in hearing your comments on the proposed noise walls or the Final Environmental Impact Statement (FEIS). Feel free to use this form to provide your input.

My property is located behind noise wall #:

C-65.1 ▶ If it is possible please consider planting of shrubs like illeagnus (sp?) and trees like crape myrtle, evergreens to provide some noise attenuation and to absorb some particulate matter -

Also - on the returning walls at access streets - consider use of a decorative facade - stamped asphalt or faux stone - to reduce the ugly utilitarian look seen on 91B -

C-65.2 ▶ Please consider noise readings on Bells Ferry Rd 1 mile from 75 - before and after construction of HOT lanes -

for future consideration of sound barriers on east side

C-65.1
As noted in the Georgia Department of Transportation's Highway Noise Abatement Policy, the planting of vegetation or landscaping is not an acceptable noise abatement measure since only dense stands of mature evergreen vegetation at least 100 feet deep would noticeably reduce noise levels.

C-65.2
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in Section 5.12, Appendix F and the Noise Technical Report of the FEIS. Preliminary noise walls are shown in Appendix H in Volume 2 of the FEIS. The noise analysis indicates that existing noise levels in the vicinity of Bells Ferry Road on the east side of I-75 range from 64.8 dBA – 69.4 dBA. Under the No-Build Alternative, the predicted noise levels range from 68.3 dBA – 72.0 dBA. The predicted noise levels for the Preferred Alternative range from 68.2 dBA – 71.9 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #37 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would not be feasible. That is, none of the impacted receptors would receive reduction in noise levels of 5 dBA or more with a noise wall. Noise wall #10-11 in the vicinity of Bells Ferry Road on the west side of I-75 was analyzed, but was found to be not cost effective. Therefore, as currently designed traffic noise would not be reflected from a noise wall on the west side back across to the east side of I-75.

The noise abatement evaluated at these locations is based upon preliminary noise analyses and design criteria.

COMMENT C-65 (cont'd)	RESPONSE
	C-65.2 A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the noise abatement will be reconsidered and might be provided based on additional public involvement. The final locations and heights will not be established until final design. Property owners located behind proposed noise walls will be contacted to determine if there is a consensus to construct a particular noise wall or not.

This space is intentionally blank.

COMMENT C-66

RESPONSE

NWCP

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256
November 2011 Community Noise Meeting

Name Gail Rakestraw

Address 90 Manuel Dr

City, State, Zip Marietta, GA 30066

Email

The Department is interested in hearing your comments on the proposed noise walls or the Final Environmental Impact Statement (FEIS). Feel free to use this form to provide your input.

My property is located behind noise wall #: NONE!

C-66.1 ▶ How would you feel if I-75 was coming to your front door?

C-66.1
Sound wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that the cost of constructing a wall at this location would exceed the maximum cost allowable of $55,000 per benefitted receptor. Therefore, a noise wall is not proposed at this location.

The noise abatement evaluated at these locations is based upon preliminary noise analyses and design criteria.

A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the noise abatement will be reconsidered and might be provided based on additional public involvement.

COMMENT C-67

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256
November 2011 Community Noise Meeting

NWCP

Name EILEEN SIMMS

Address 566 KURTZ ROAD

City, State, Zip MARIETTA, GA 30066

Email eileensimms@yahoo.com

The Department is interested in hearing your comments on the proposed noise walls or the Final Environmental Impact Statement (FEIS). Feel free to use this form to provide your input.

My property is located behind noise wall #: 9

C-67.1 ▶ NOISE BARRIERS ARE NEEDED AT BELLS FERRY AND 75, ON BOTH SIDES OF THE ROAD. IF THEY ARE ONLY ON THE WEST SIDE THEN THE NOISE WILL DEFINETECY INCREASE ON THE EAST SIDE.

C-67.2 ▶ TREES ALSO WOULD BE A HELP TO QUIET THE NOISE IF BARRIERS ARE NOT USED.

C-67.1 ▶ NOISE READINGS ARE NEEDED ON BELLS FERRY FOR 2 MILES EAST OF 75 BOTH BEFORE & AFTER THE PROJECT.

RESPONSE

C-67.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in Section 5.12, Appendix F and the Noise Technical Report of the FEIS. Preliminary noise walls are shown in Appendix H in Volume 2 of the FEIS. The noise analysis indicates that existing noise levels in the vicinity of Bells Ferry Road on the east side of I-75 range from 64.8 dBA – 69.4 dBA. Under the No-Build Alternative, the predicted noise levels range from 68.3 dBA – 72.0 dBA. The predicted noise levels for the Preferred Alternative range from 68.2 dBA – 71.9 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #37 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would not be feasible. That is, none of the impacted receptors would receive reduction in noise levels of 5 dBA or more with a noise wall. Noise wall #10-11 in the vicinity of Bells Ferry Road on the west side of I-75 was analyzed, but was found to be not cost effective. Therefore, as currently designed traffic noise would not be reflected from a noise wall on the west side back across to the east side of I-75.

The noise abatement evaluated at these locations is based upon preliminary noise analyses and design criteria.
A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the noise abatement will be reconsidered and might be provided based on additional public involvement.

C-67.2
As noted in the Georgia Department of Transportation's Highway Noise Abatement Policy, the planting of vegetation or landscaping is not an acceptable noise abatement measure since only dense stands of mature evergreen vegetation at least 100 feet deep would noticeably reduce noise levels.

COMMENT C-68

Northwest Corridor Project (I-75/I-575)
Project CSNHS-0008-00(256), P.I. 0008256
November 2011 Community Noise Meeting

NWCP

Name Tom Wilder

Address 312 Gray Shingle LN

City, State, Zip Woodstock GA 30189

Email tom@wilder-realty.com

The Department is interested in hearing your comments on the proposed noise walls or the Final Environmental Impact Statement (FEIS). Feel free to use this form to provide your input.

My property is located behind noise wall #:

C-68.1 ▶ I'm behind sound barrier #2 on 575. Our neighborhood is a senior citizens development called The Villages at Towne Lake. It is a 260 lot development with approximately 95 homes.

RESPONSE

C-68.1

The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in Section 5.12, Appendix F and the Noise Technical Report of the FEIS. Preliminary noise walls are shown in Appendix H in Volume 2 of the FEIS. The noise analysis indicates that existing noise levels in the vicinity of the Villages at Towne Lake subdivision on the west side of I-575 south of Dupree Road range from 62.4 dBA – 64.5 dBA. Under the No-Build Alternative, the predicted noise levels range from 64.9 dBA – 66.9 dBA. The predicted noise levels for the Preferred Alternative range from 65.4 dBA – 67.5 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #2 was analyzed to provide noise mitigation along I-575 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

The final locations and heights will not be established until final design. Property owners located behind proposed noise walls will be contacted to determine if there is a consensus to construct a particular noise wall or not.

COMMENT C-69	RESPONSE

NWCP

Northwest Corridor Project (I-75/I-575)
Project [illegible]
November 2011 Community Noise Meeting

Name Michael Wood [illegible]
Address 70 Cornell Ct
City, State, Zip Marietta GA 30066
Email [illegible]

The Department is interested in hearing your comments on the proposed noise walls on the Final Environmental Impact Statement (FEIS). Feel free to use this form to provide your input.

My property is located behind noise wall #: NONE !

C-69.1 ▶ I was shocked & Disappointed to learn that a noise wall for our neighborhood was not included in the latest plans shown at the Nov. Noise wall meeting. I was told that there were not enough people being impacted by the noise from the Highway. How many is enough? I have personally spoken with 5 Families (≈18 people) and been in contact with 2 other households (another 5 people) and they all have assured me that they are deeply affected by the noise. About half of us (myself included) bought our houses before I-75 was built or expanded beyond 4 lanes.
Please reconsider a noise barrier or purchasing our properties (I would guess there are companies that would love to be located next to the Highway) or for future expansion of the Highway.
Thank you for listening to my comments and thanks to Kristen Hansen-Dederick for keeping me informed

C-69.1

Sound wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that the cost of constructing a wall at this location would exceed the maximum cost allowable of $55,000 per benefitted receptor. Therefore, a noise wall is not proposed at this location.

The noise abatement evaluated at these locations is based upon preliminary noise analyses and design criteria.

A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the noise abatement will be reconsidered and might be provided based on additional public involvement.

(See Comment/Response 63)

COMMENTS AND RESPONSES

FEIS REEVALUATION

COMMENT C-70	RESPONSE

I support the I-75 / 575 project as most recently updated Page 1 of 1

C-70.1 ▶ **I support the I-75 / 575 project as most recently updated**
an email sent by (Site Administrator) on 5 Apr 13 at 11:01am

From: U3calwy8@aol.com
To: nwcpcomments@projectsolvemail.com

Comments

https://ww3.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOVB... 4/5/2013

C-70.1
Comment noted.

COMMENT C-71	RESPONSE

75 DOT NWCP
an email sent by (Site Administrator) on 23 Mar 13 at 2:35pm

From: baileyr
To: nwcpcomments@projectsolvemail.com

FirstName=Richard
LastName=Bailey
Address=3250 Old Mill Trace SE
2ndLineAddress=
EmailAddress=baileyrb@aol.com
Comments=Would like to stay informed from a resident and business perspective.
MailingList=checkboxValue
submit=Submit

C-71.1

Comments

C-71.1
Comment noted.

COMMENT C-72	RESPONSE

NW Corridor Question

an email sent by (Site Administrator) on 12 Mar 13 at 4:03pm

From: Barry Bauer
To: nwcpcomments@projectsolvemail.com

Hi,

C-72.1 ▶ I am interested in contacting the final 4 contracting/engineering groups. Can you provide me with contact name and information for each group?

Thanks

Comments

C-72.1
The four groups shortlisted for the project are:

- C.W. Matthews Contracting Co., Inc., and the Michael Baker Corp.;
- Fluor-Lane LLC;
- Georgia Transportation Partners – comprised of Bechtel Infrastructure Corp., Kiewit Infrastructure South Co., Dewberry and Davis, LLC, and STV Inc.;
- Northwest Express Road Builders – comprised of Archer Western Contractors, The Hubbard Group and Parsons Corp.

More information can be found at:
http://www.dot.ga.gov/informationcenter/p3/projects/NWC/Pages/Procurement.aspx

COMMENT C-73

I75-Roswell Rd Interchange

an email sent by (Site Administrator) on 27 Mar 13 at 1:14pm

From: Kay Dempsey
To: nwcpcomments@projectsolvemail.com

C-73.1 ▶ I am a property owner at 1151 Roswell Rd and also on Halsey Drive. I receive updates regarding Northwest Corridor Project. However, I have not been able to find exactly what parcels are affected with the Roswell Rd interchange. I would like information regarding that and a detailed plan of the I-75/Roswell Rd interchange- current map online is very difficult to read.

Thanks,

Kay Dempsey

Comments

RESPONSE

C-73.1
The properties from which Right of Way or Construction Easement is needed are shown in Appendix H in Volume 2 of the FEIS. The residential and commercial displacements are listed in the Conceptual Stage Study of the FEIS and also in Section 5.3 of the FEIS.

The final design of the project will be performed by the selected Developer. The selected Developer will provide public information and updates during design (and construction) of the project.

COMMENT C-74	RESPONSE

From: DiMassimo, Faye [mailto:Faye.DiMassimo@cobbcounty.org]
Sent: Tuesday, April 02, 2013 03:58 PM
To: VanMeter, Darryl; Golden, Keith
Cc: Lee, Tim <TLee@cobbcounty.org>; Hankerson, David <David.Hankerson@cobbcounty.org>; McDuff, Daniel <Daniel.McDuff@cobbcounty.org>
Subject: Project CSNHS-0008-00(256), P.I. No. 0008256 - Northwest Corridor Project (I-75/I-575) Final Environmental Impact Statement Re-Evaluation

Commissioner Keith Golden, P.E.
One Georgia Center
600 West Peachtree Street N.W.
Atlanta, Georgia 30308

Commissioner Golden,

C-74.1 ▶ On behalf of Cobb County, we want to offer our comments highly supporting the subject project and improvements for I-75 and I-575. The new managed lanes will facilitate commuter morning and evening peaks and we believe will be an important infrastructure investment aimed at congestion management. This will also be an especially supportive project to existing express bus operations and potential future transit investments. Additionally, we understand the changes made resulting in the Design, Build, Finance (DBF) delivery procurement process currently proposed with responsibility for operations, maintenance, tolling and long term financing retained by the State. Thank you for GDOT's leadership in bringing this important project to fruition.

Faye Q. DiMassimo, AICP
Director
Cobb County Department of Transportation
1890 County Services Parkway
Marietta, Georgia 30008-4014
770-528-1645 direct
770-528-1611 fax
770-241-0277 cell

Cobb County...Expect The Best

www.cobbcounty.org

C-74.1
Comment noted.

COMMENT C-75	RESPONSE

Comments re: Northwest Corridor Page 1 of 1

Comments re: Northwest Corridor
an email sent by (Site Administrator) on 19 Mar 13 at 7:15pm

From: Kevin Doyle
To: nwcpcomments@projectsolvemail.com

Thank you for the recent update.

C-75.1 ▶ Has the project cost also be updated or re-evaluated? I'm guessing that it can only have risen. Would you please advise?

Thanks.

Kevin Doyle, daily commuter on I-75 between Cobb County Loop 120 and Midtown
2112 Dayron Circle, Marietta 30063

Comments

https://ww3.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOV... 3/22/2013

C-75.1
The project is anticipated to cost $995,000,000 as detailed in the Atlanta Regional Commission's Fiscal Year 2012-2017 Transportation Improvement Program.

COMMENT C-76	RESPONSE

C-76.1 ▶

From: Galambos, Eva [mailto:EGalambos@SandySpringsga.gov]
Sent: Tuesday, March 26, 2013 1:08 PM
To: Kristine Hansen-Dederick
Subject: RE: Georgia DOT Northwest Corridor Project (I-75 & I-575)

I cannot for the life understand why I was sent the Environmental Impact Study. I did look at it, and it reinforced my total displeasure with EPA and its regulations. What is required to do any infrastructure these days is past ridiculous. You may share my meesage with whomever you wish. Eva Galambos, Mayuor, Sandy Springs

---

From: Kristine Hansen-Dederick [hansen-dederick@sycamoreconsulting.net]
Sent: Tuesday, March 26, 2013 12:43 PM
To: hansen-dederick@sycamoreconsulting.net
Subject: Georgia DOT Northwest Corridor Project (I-75 & I-575)

Good Afternoon:

The comment period associated with the Environmental Reevaluation has been extended. If you would like to submit a comment on the project, please do so by **April 5, 2013**.

Thank you-
Kristine

Kristine Hansen-Dederick, AICP
Sycamore Consulting, Inc.
195 Arizona Ave, Unit LW-4
Atlanta, GA 30307
P: 404-377-9147
F: 404-377-9091

C-76.1
The NWCP is subject to the requirements of the National Environmental Policy Act of 1969 (NEPA). The NEPA established a supplemental mandate for Federal agencies to consider the potential environmental consequences of their proposals, document the analysis, and make this information available to the public for comment prior to implementation. Distribution of the environmental documents is part of the mandate to make the information available to the public. This distribution also includes distribution to local agencies and officials.

The Environmental Protection Agency (EPA), has review responsibilities, but is not the lead federal agency for this project. The Federal Highway Administration (FHWA) is the lead federal agency for the project. In addition to the responsibilities mentioned above, FHWA must assure that the environmental documentation for the Environmental Impact Statement (EIS) is still valid, prior to proceeding with major project approvals or authorizations. This is accomplished through a reevaluation, which is an assessment of any changes which may have occurred in either the project's concept or the affected environment, and a determination of what effects these changes might have on the validity of the environmental documentation.

COMMENT C-77

RESPONSE

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 404-521-9900 | THE CANDLER BUILDING, 127 PEACHTREE STREET NE, SUITE 605, ATLANTA, GA 30303-1840 | Facsimile 404-521-9909

April 5, 2013

By Electronic Mail and U.S. Mail

Darryl VanMeter, P.E.
Office of Innovative Program Delivery
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 W. Peachtree Street, NW 27th Floor
Atlanta, GA 30308

Rodney N. Barry, P.E.
Division Administrator
Federal Highway Administration
Georgia Division
61 Forsyth Street, SW
Suite 17T 1 00
Atlanta, GA 30303-3104

RE: Comments on Reevaluation of the Final Environmental Impact Statement for the Proposed Northwest Corridor Project

Dear Messrs. VanMeter and Barry:

On behalf of Citizens for Progressive Transit, the Georgia Chapter of the Sierra Club and Mothers & Others for Clean Air, the Southern Environmental Law Center (SELC) submits the following comments on the Reevaluation of the Final Environmental Impact Statement (Reevaluation) for the Northwest Corridor Managed Lane Project in Cobb and Cherokee Counties, Georgia. The Reevaluation considers a number of important changes to the project since its Final Environmental Impact Statement (FEIS) was issued in 2011. However, there remain a number of important concerns that still have not been adequately considered and must be addressed either prior to or as part of the Record of Decision for this project.

I. The Selection of ETL as the Preferred Tolling Policy Has Not Been Adequately Studied.

One significant change to this project is the planned tolling policy. The use of managed lanes as a transportation strategy in metro Atlanta has been studied for nearly a decade. Until recently, the studies have focused on utilizing a three person high occupancy tolling policy

Charlottesville • Chapel Hill • Atlanta • Asheville • Birmingham • Charleston • Nashville • Richmond • Washington, DC

This space is intentionally blank.

COMMENT C-77 (con't)

(HOT3) as is used on the managed lanes on I-85. Metro Atlanta's Managed Lane System Plan (MLSP), adopted by the Georgia State Transportation Board as the official state policy for managed lane projects in the region, concludes that HOT3+ is "the recommended eligibility policy for the managed lane system." Atlanta Regional Managed Lane System Plan, Georgia Department of Transportation (January 2010) at 12[1]. Despite this conclusion and the emphasis on HOT3 as the preferred tolling strategy in previous documents for the Northwest Corridor and other projects, the Final EIS and now the Reevaluation state that the preferred tolling policy will be that of express toll lanes (ETL).

Only two brief portions of the environmental review documents for Northwest Corridor analyze the impacts of this change in policy. The remainder of the analysis contained in the FEIS and Reevaluation is based on the continued use of HOT3 as the tolling policy. Failing to fully assess the impact of the change in tolling policy is an important shortcoming of the FEIS and Reevaluation that must be addressed before this project can move forward.

The first document that addresses this change in tolling policy is the Travel Forecasting-Sensitivity Analysis for Tolling contained in both the Final EIS and the Reevaluation. See, Reevaluation at Attachment 2 Table 25; Traffic Technical Report 2013 Addendum at 2-2 through 2-5. This sensitivity analysis compares the traffic counts for the managed lanes under ETL and HOT3 and ultimately concluded the differences to be "generally the same under both tolling policies." Reevaluation at 44. However, this comparison shows three consistent trends in the performance of ETL versus HOT lanes:

- The ETL policy produced higher traffic volumes in the general purpose lanes;
- The ETL policy produced lower traffic volumes in the tolled lanes; and
- The ETL policy produced lower volumes for the road as a whole.

All of the other travel forecasting and all adverse effects analysis that relies on travel forecasting (such as air quality and noise impacts) are premised on modeling that utilizes HOT3 as the tolling policy. The FEIS' approach of concluding that the travel forecasts under the two scenarios is "generally the same" so all other adverse effects under the two policies must also be "generally the same" does not constitute actual analysis and does not satisfy the requirements of NEPA.

The second document comparing the tolling policies is the Evaluation of the Tolling Policy for the I-75 and I-575 Northwest Corridor Project Technical Memorandum. See, Appendix A to the Technical Memorandum Update – Evaluation of Tolling Effects on Low Income Populations. This Toll Policy Memorandum offers a largely qualitative comparison of the two policies including the following:

[1] http://www.dot.ga.gov/informationcenter/programs/studies/managedlanes/Documents/FINALREPORT.pdf

2

RESPONSE

C-77.1

As noted, the *Atlanta Regional Managed Lanes System Plan* generally recommends the implementation of the HOT3+ tolling policy, but also recognizes that a project specific analysis is necessary to determine the preferred tolling policy for an identified project. The approval resolution for the *Metro-Atlanta Managed Lanes System Plan* (December 10, 2009 and attached) states "4. Within the context of a system-wide plan, each solution will be tailored to individual corridor needs." Earlier versions of NWCP environmental documents used HOT3+ traffic volumes for analysis, however as noted below (page 4) this was never intended to convey a selection in even a preliminary fashion of that tolling policy. The tolling sensitivity analysis in the documents demonstrated that the difference in traffic volumes generated by the HOT3+ and ETL tolling strategies was not meaningful in the development of technical analysis (particularly traffic, noise and air) for the documents. In December 2010 the ETL Tolling policy was approved by the GDOT P3 Steering Committee (FEIS, page 2-42). Work on the FEIS had advanced substantially at the time GDOT made this determination; since the differences in traffic volumes were demonstrated as not meaningful, the analysis was completed using the HOT3+ traffic volumes. All analyses in the Reevaluation were conducted under the ETL tolling policy.

In addition, the *Toll Policy Memorandum* states the justification for ETL rather than a HOT3+ toll policy. Investment grade traffic and revenue analysis was performed in 2012. Revenue estimates from this effort are lower than those generated for the 2010 analysis, providing further confirmation that a HOT3+ policy would not achieve the financial goals for the project. One of the goals of the project is to "provide cost-effective and affordable transportation improvements."

C-77.2

All analyses in the Reevaluation that rely on travel forecasting (*Traffic Technical Report – 2013 Addendum, Noise Technical Report – 2013 Addendum* and *Air Quality Technical Report – 2013 Addendum*) were conducted under the ETL tolling policy.

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	It should be noted that while the FEIS used the ARC *Envision6 Travel Demand Model*, the current ARC *Plan2040 Travel Demand Model*, which was approved for use in late 2011, was used in the preparation of FEIS Reevaluation. Therefore, the results of the *Envision6* modeling prepared for the FEIS cannot be compared directly to the new results based on *PLAN 2040*. However, for continuity between the two modeling approaches, similar toll rates were used for the FEIS and the Reevaluation. The traffic model used to analyze usage in the general purpose and toll lanes is not able to adjust for a dynamic pricing tolling scenario. The *PLAN 2040* model provides managed lane volumes by time of day (morning, midday, evening and night). These volumes were converted to peak hour volumes based on existing traffic data for the corridor. There are a number of newly developed dynamic traffic assignment analysis tools available, however after evaluating these tools through the guidance provided in FHWA's *Traffic Analysis Toolbox Volume II: Decision Support Methodology for Selecting Traffic Analysis Tools (2004)* it was determined that the ARC Plan 2040 Travel Demand Model was appropriate to the analysis being prepared. It was felt that the number of assumptions required for use of a dynamic traffic assignment methodology would not yield significantly more reliable results than refinement of the model's peak period volumes. It may be appropriate to utilize dynamic traffic assignment analysis in the design of the facility. As a result, a static toll rate was used in the traffic analysis for both the FEIS and the FEIS Reevaluation. Similar toll rates were used for the traffic analysis in the FEIS and the Reevaluation to ensure continuity in the analyses. On January 25, 2013 the Travel Surveys & Transportation Model Development Manager for the Atlanta Regional Commission noted that the modeling "work performed is acceptable and conforms with the proper use of the ARC regional travel demand model [Plan 2040] in terms of traffic forecasting methodology." The key to variable pricing for managed lane facilities is the ability to increase usage by dynamically reducing the toll. As noted in the FEIS, "Setting the specific tolling rates is a financial and operational

COMMENT C-77 (con't)	RESPONSE
	matter, and therefore is not evaluated in this FEIS." (Volume 1a, page 2-44). The toll rates for the facility as operated will optimize the usage for the managed lane facilities meeting the 45 mph minimum speed (FEIS Volume 1a, Page 2-43). This optimization will likely yield additional managed lane volumes, as the toll rate varies, likely similar to those in the FEIS.
	C-77.3 The statement concerning travel forecasting and adverse effects analysis in the Reevaluation relying on the HOT3+ as a tolling policy is incorrect. All of the analysis that relies on travel forecasting in the Reevaluation (*Traffic Technical Report – 2013 Addendum, Noise Technical Report – 2013 Addendum* and *Air Quality Technical Report – 2013 Addendum*) uses the ETL tolling strategy and traffic volumes developed from that tolling policy for the Northwest Corridor Project. It is important to note that the *Sensitivity Analysis* for the tolling sections of the FEIS and the Reevaluation had a very limited purpose. These sections in both documents were intended to determine if there was a meaningful difference in traffic volumes based on the tolling policy. The focus of the toll sensitivity analysis was related to being able to adequately assess the impacts of the tolling policy on the project, not to determine the tolling policy to be used in the corridor.
This space is intentionally blank.	

COMMENT C-77 (con't)

A toll policy using HOT3+ encourages both HOV formation and transit usage since carpools of 3 or more persons and transit vehicles are guaranteed a congestion-free ride at no additional charge. An ETL policy does not provide for non-tolled carpool formation, but it does encourage carpools based on the mobility provided and in sharing of the toll cost among the carpoolers. Additionally, transit users can enjoy the enhanced mobility for no additional cost.

Toll Policy Memorandum at 3. The Toll Policy Memorandum concludes that a HOT3+ policy "does more to encourage HOV formation than does ETL, but this policy introduces an increased burden in accurately accounting for these free vehicles and requires additional processing costs for transactions that generate no revenue." Id. (emphasis added).

C-77.4▶ Both the traffic sensitivity analysis and the Toll Policy Memorandum conclude that the choice of tolling policy has meaningful real world differences for the project, both in terms of its transportation performance and its environmental effects. But because the traffic sensitivity analysis is extremely limited in scope and the Toll Policy Memorandum is largely qualitative in nature, they do not fully explore the implications of the tolling policy choice. Specifically, the Final EIS and the Reevaluation do not compare the relative effects of the tolling policies with respect to the following issues:

- Whether utilizing an ETL tolling policy will result in higher toll prices and the potential impact on the ability of low income drivers to utilize the lanes;
- Why total traffic volumes decrease under the ETL policy and whether these drivers are instead are using transit, increasing congestion on adjacent roads by utilizing alternate routes, or forgoing trips altogether;
- Whether the reduction in HOV formation will increase the air quality impacts of the project (including air pollutants beyond those considered as part of the conformity analysis);
- Whether the increased number of drivers in the general purpose lanes under the ETL policy will increase the air quality impacts of the project (including air pollutants beyond those considered as part of the conformity analysis) due to the increased number of drivers experiencing increased congestion in the general purpose lanes;
- The environmental justice implications of increasing the level of service discrepancy between the general purpose lanes and the managed lanes, if low income drivers are less likely to utilize the managed lanes;
- Whether the reduced HOV formation will disproportionately occur among lower income drivers and whether this will further prevent low income drivers from receiving the benefits of the managed lanes at the same rate as higher income drivers

C-77.5▶ The implications of utilizing an ETL policy instead of a HOT3 policy must be comprehensively evaluated and addressed with respect to each of these issues before completing the environmental review for this project.

3

RESPONSE

C-77.4

- It is likely that the ETL policy may actually act to keep toll rates lower. In a variable tolling scenario, the rates change to reflect actual usage of the system. As more cars enter the system, the rates will increase. This ensures that fewer vehicles enter the system so it does not become overcapacity. In a HOT3+ tolling scenario, there is a certain amount of capacity that is already occupied by users who are not paying for use of the system. In order to discourage use of the system by other vehicles the toll rates will need to be higher. In an ETL tolling scenario rates will be expected to be lower for toll-paying individuals, but there is no longer a payment-free option other than transit or other exempt vehicles. Concerning the ability to use the lanes, a key distinction must be made. The ability to use the lanes refers to minimizing the obstacles to participation, i.e., obtaining a transponder, allowing for cash transactions, etc. A willingness to pay for the use of the lanes and reduce travel time is a different issue. The key is having the choice available to balance against the value of reduced travel time. The analysis shows that the GP lanes will typically operate better under the Preferred Alternative than under the No-Build Alternative.
- A traffic sensitivity analysis comparing ETL and HOT3+ was prepared for the FEIS and the FEIS Reevaluation to determine if the regional model showed meaningful traffic volume differences between the two tolling policies. The conclusion both times was that the number of vehicles using the corridor would be similar under the two tolling policies (see Section 4.1.2 in the FEIS and Section 2.2 in the *Traffic Technical Report – 2013 Addendum* for the Reevaluation).
- The air quality analysis was performed using ETL traffic volume data in the Reevaluation so the air quality analysis in the Reevaluation document is based on the ETL tolling policy.

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	C-77.4 o Again the air quality analysis was performed using ETL traffic volume data in the Reevaluation. The air quality analysis in the Reevaluation document is based on the ETL tolling policy, so the expected air quality impacts of the project have been identified in the Reevaluation document. The air quality analysis considered all criteria pollutants, MSATs and greenhouse gases, not just the pollutants required for conformity (ozone, $PM_{2.5}$ and CO). o The overall general purpose (GP) lane LOS is better with the added capacity of the managed lanes in the corridor. Without the managed lanes (the No-Build), low income populations would suffer a decreased level of service (LOS) on the GP lanes, as would the all users in the corridor. In addition, with no choice to avoid congestion, both low income populations using single occupant vehicles and transit vehicles suffer from traffic congestion and associated travel time delays. Evidence shows that while the frequency of priced managed lane use may be higher with higher income individuals, lower income individuals are likely to value the choice to avoid congestion (Page 8-9, Income-Based Equity Impacts of Congestion Pricing). o HOV formation may occur since there is incentive to make use of the managed lane system for reliable trip times (U.S. EPA, Transportation Control Measure Information Documents. 400-R-92-006. March 1992. http://www.epa.gov/oms/stateresources/policy/transp/tcms/high_occvehicles.pdf). Transit vehicles are permitted to use the managed lanes without paying a toll. In addition, transit providers are provided with the benefits of the reliable trip time without the burden of the capital expense and maintenance of the facility that they are using. Because the transit operators are allowed to ride without paying a toll, they are also not burdened with administrative costs of accounting for trips that qualify for reimbursement, which has been used in other similar facilities.

COMMENT C-77 (con't)

This space is intentionally blank.

RESPONSE

Also as noted on page 8 of the Income-Based Equity Impacts of Congestion Pricing, "Morallos (2006) found that, although limited, evidence from the successfully operating VPP projects clearly demonstrates that the most valued feature in tolling and pricing projects is that of providing people with a choice of whether to use priced lanes. Studies have shown that lower income individuals face the greatest financial harm when they are denied adequate travel choices. Lack of choice to pay a toll in exchange for reliable travel times can result in lost wages or late fees for daycare that could have been avoided."

C-77.5

GDOT interdepartmental correspondence to the P3 steering committee on May 19, 2010 states "…that a HOT3+ policy will not achieve the financial goals for the project". Analysis at the time indicated that HOT3+ could add over $100 million to the required public subsidy to develop the project. Following the change to the procurement approach of the NWC Project, GDOT again assessed the implications of utilizing an ETL policy instead of a HOT3+ policy. The *Toll Policy Memorandum* dated November 20, 2012 *(*Appendix A to the *Technical Memorandum Update – Evaluation of Tolling Effects on Low Income Populations* for the FEIS Reevaluation*)* states the justification for ETL rather than a HOT3+ toll policy. In summary, "while HOT3+ does encourage HOV formations; overall ETL is less costly to implement, easier and less costly to operate and enforce, generates higher revenues, and carries less revenue risk than HOT3+."

One of the goals of the project is to "provide cost-effective and affordable transportation improvements." This goal is consistent with GDOT policy adopted June 21, 2007 that "All new capacity lanes within limited access corridors in Metro-Atlanta shall be managed:"

The nature of the NWCP must relate strongly to the choice of tolling policy. The financial requirements of the project must be met in order to implement it. There are no existing HOV lanes in the I-75

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	C-77.5 or I-575 corridors. This means that a lower cost HOV to HOT conversion project, such as the recent I-85 project, is not an alternative. Project construction costs for HOT3+ and ETL are the same. Using Dynamic Tolling means that the number of vehicles in the managed lanes is managed by adjusting the toll rate up or down to essentially "sell" the improved travel time to a willing buyer. If more vehicles occupy the lanes without paying, then the remaining spaces within the lanes become more valuable (the concept of economic scarcity) vehicles paying the toll would pay at a higher rate, however there is a limit to the amount that will be a willing customer will pay; how much the time saved is worth. If there are fewer spaces to sell in the managed lanes, and the maximum users are willing to pay stays constant, then this may impact the projects' ability to meet its financial requirements. If the project cannot meet its financial requirements from project revenues, the state (GDOT) must provide the difference. This could impact the potential to implement other transportation projects. The ETL policy was chosen as the toll policy for the Northwest Corridor Project for the reasons outlined in the *Tolling Policy for the I-75 and I-575 Northwest Corridor Project Technical Memorandum*, which is Appendix A to the *Technical Memorandum Update - Evaluation of Tolling Effects on Low Income Populations*. In addition to the fiduciary issues, allowing vehicles to use the managed lanes for free under a HOT3+ policy could result in operational issues as the number of vehicles in the managed lanes at a given time could not be managed. If this were to occur, the project would not meet one of its key purposes: "... improve mobility by reducing travel time and increasing reliability."

COMMENT C-77 (con't)

II. The Environmental Review Documents Have Not Adequately Evaluated The Environmental Justice Effects on Lower Income Drivers or Appropriate Mitigation for Those Effects.

The decision to use ETL as the tolling policy amplifies a number of concerns regarding the sufficiency of the project's environmental justice analysis. The Final EIS and Reevaluation give limited consideration to the project's impacts on low income communities and fail to analyze a number of feasible mitigation strategies. This environmental justice analysis must be supplemented before completing the environmental review for this project.

a. Decreased Usage of the Managed Lanes by Low Income Drivers Constitutes An Adverse Effect Under U.S. DOT Environmental Justice Policies.

The majority of the environmental justice analysis in both the Reevaluation and the Final EIS focuses on whether minority or low income communities would suffer disproportionate impacts from the project. However, as U.S. DOT's Final Environmental Justice Order 5610.2(a) make clear, "adverse effects" for purposes of environmental justice analysis also includes the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income
C-77.6 ▶ populations.[2] The primary putative benefit of the Northwest Corridor project is that it offers improved travel conditions compared to the untolled, general purpose lanes. Thus, the environmental justice analysis for this project must not only examine whether minority and low income communities will disproportionately suffer the project's impacts, but also whether those communities will receive less of the project's benefits. The Reevaluation's environmental justice analysis falls short in this regard.

b. The Reevaluation Fails to Address Why Its Equity Modeling Produced Results Contrary to Data From Around the County.

The Reevaluation's analysis of the impacts on low income drivers relies primarily on traffic forecasting and statistical analysis. See, Evaluation of Tolling Effects on Low-Income Populations, Northwest Corridor Project, Technical Memorandum Update. Specifically, the Reevaluation uses outputs from the Atlanta Regional Commission's traffic demand model predicting that low income areas will not contribute fewer managed lane trips than higher income areas. The Reevaluation also cites public opinion surveys and studies on transponder subscriptions showing that low income drivers hold similar views and acquire transponders at
C-77.7 ▶ rates similar to those of higher income users. Based on the modeling, transponder studies and public opinion information, the Reevaluation concludes that "there does not appear to be a strong relationship between the percent of low-income households and NWC Managed Lane usage." Id. at 21.

[2] http://www.fhwa.dot.gov/environment/environmental_justice/ej_at_dot/dot_ej_strategy/index.cfm

4

RESPONSE

C-77.6

While the Northwest Corridor Project should provide uncongested travel conditions for vehicles (including transit vehicles) in the managed lanes, it should also provide improved travel conditions in the general purpose lanes. Three of the goals of the project are to:

- improve transportation effectiveness of I-75 and I-575 to additional travel and to contribute to the improved performance of the regional system
- provide additional transportation choices or options that increase the capacity of I-75 and I-575
- improve the quality of life by improving mobility and minimizing effects to both natural resources and the built environment

Meeting these goals provides the benefits of the Northwest Corridor Project.

Page 31, lines 19-22 of the *Technical Memorandum Update - Evaluation of Tolling Effects on Low Income Populations* states the following: the evaluation of tolling effects on low income populations indicates that the implementation of new, tolled capacity is anticipated to generate adverse impacts on all populations, including the EJ population. Decreased usage, while possible, is attributable to individual choices. The benefits of the project accrue to all users of the managed lanes, regardless of income, and to all users of the general purpose lanes, regardless of income, and will therefore not amount to a denial, reduction, or significant delay in the receipt of benefits to low income populations.

C-77.7

The I-85 Express lanes opened to traffic on October 1, 2011, and have been in operation since that date. This project includes one express lane in each direction, separated by pavement striping from the free general purpose lanes, with designated weave zones to allow access into and out of the lanes. The I-85 Express lanes were developed through a conversion from the HOV2+ lanes, and there

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	was no lane capacity expansion as part of the project. Conversely, the NWC Project provides 1 to 2 new lanes in the peak direction of travel, separated by barrier from the general purpose lanes, with dedicated access ramps. These are all differences between the projects, and these differences limit the ability to draw conclusions from the I-85 Express experience and apply them to forecast operations on the Northwest Corridor Project. However, analysis of the first 12 months of operations for the I-85 HOT lanes is ongoing. Battelle Memorial Institute is drafting this report, and it is not yet available. "Although data from priced lanes that are operated in the United States show that high-income motorists do use the lanes more often, the lanes are used by all income groups, serving drivers' needs when they absolutely have to get to their destinations on time (e.g., getting to a daycare center before late fees kick in). Moreover, approval ratings are equally high for all income groups, in the 60–80 percent range, because all income groups value the "insurance" of a reliable trip time when they absolutely need it." (Page 19 Income-Based Equity Impacts of Congestion Pricing). The results of the Northwest Corridor Project equity modeling demonstrate that there is no statistically significant relationship between the income profile of a user's origin traffic analysis zone and the utilization rate of the managed lanes (see pg. 21, lines 22-24 of the *Technical Memo Update - Evaluation of Tolling Effects on Low Income Populations*). The quantitative analysis does not provide direct insight into the frequency of managed lane utilization across income levels, and therefore is not contradictory to data from around the country.

COMMENT C-77 (con't)

The Reevaluation fails to examine actual data on managed lane usage, either in metro Atlanta or elsewhere in the country. Academic analysis of driver data from other managed lane projects has shown that drivers of all income levels utilize the lanes but higher income drivers use the lanes with greater frequency than low income drivers. See, Income Based Equity Impacts of Congestion Pricing: A Primer, Federal Highway Administration (Dec. 2008) at 19; Lexus Lanes or Corolla Lanes: Spatial Use and Equity Patterns on the I-394 MnPASS Lanes, T. Patterson and D. Levinson (March 2008)("[T]he analysis demonstrates that individuals with higher incomes receive more direct benefits from the lane than those with lower incomes."); Continuation Study to Evaluate the Impacts of the SR 91 Value-Priced Express Lanes Final Report, E. Sullivan, (2000)(Toll lane usage roughly doubled for users over $100,000 compared to users between $40,000 and $100,000.).

The Reevaluation cannot rely on environmental justice modeling, opinion polls and transponder subscriptions when research on actual usage directly contradicts their conclusions. Ignoring usage research is particularly inappropriate where, as here, the modeling is unable to project environmental justice impacts with sufficient granularity.[3]

The Reevaluation's assertion that the environmental justice effects of managed lanes cannot be known because they are "new to Georgia and [] untested" is wholly unpersuasive. As of the date of this letter, over eighteen months' worth of trip data is available for the I-85 HOT lanes which could be analyzed to determine actual usage patterns and to validate the accuracy of the ARC modeling in predicting managed lane usage in the area.[4] This assertion that actual usage patterns cannot be studied is particularly perplexing considering the outstanding commitment to conduct that exact analysis for the I-85 HOT lanes:

> An annual performance survey will be conducted after the first year of operation to validate the conclusion that the proposed project would not have disproportionate adverse impacts on environmental justice populations.

Finding of No Significant Impact for I-85 HOV to HOT Conversion, Federal Highway Administration (March 2010) at III-30. Not only does the necessary data exist to examine actual travel patterns, but the analysis should have already been conducted as part of the I-85 project.

Given the shortcomings of the analysis tools used in the Reevaluation, the contradiction between their results and studies from elsewhere, and the viability of testing that analysis with real world data in Atlanta, the Reevaluation's environmental justice analysis is inadequate to support a Record of Decision.

[3] "[T]he ARC model does not generate specific detail on any one user's income group, race, or any other socioeconomic characteristic." Evaluation of Tolling Effects on Low-Income Populations, Northwest Corridor Project, Technical Memorandum Update at 31.
[4] To the extent usage patterns on the HOT3 lanes on I-85 may differ from the ETL lanes proposed for I-75 and I-575, that simply underscores the need for a more robust analysis of the differences between the tolling policies.

5

RESPONSE

This space is intentionally blank.

COMMENT C-77 (con't)

c. The Reevaluation Enhances Environmental Justice Concerns by Showing the Difference in Traffic Conditions Between the Managed Lanes and General Purpose Lanes To Be Greater Than First Projected.

C-77.8▶ The purpose of the managed lanes is to improve travel conditions in those particular lanes, not to improve conditions in the untolled, general purpose lanes. See, Final Environmental Impact Statement at 5-114 (Managed lanes "do not, nor are they intended to, resolve or even substantially improve congestion in the general-purpose lanes.") The Reevaluation's modeling shows this proposition holds true for the Northwest Corridor project, as travel conditions in the managed lanes are systematically better than the conditions in the untolled lanes. Of the segments analyzed in Tables 26-31 of the Reevaluation, the managed lanes have a better level of service than the No Build Scenario in every single segment analyzed. In comparison, the general purpose lanes only outperform the No Build Scenario in only four of the 64 segments (and perform worse in one segment). See, table attached hereto as Appendix A.

In fact, the Reevaluation shows that the discrepancy in traffic conditions will be even greater than projected in the FEIS. Under the Reevaluation, traffic conditions in the managed lanes would be even better than initially projected and traffic conditions in the general purpose lanes would be even worse.

Segment Level Comparison of Projected Level of Service From FEIS to Reevaluation
(Based on Reevaluation Tables 28-31)

	Segments Improved	Segments Unchanged	Segments Worsened
2018 GP Lanes	2	7	23
2018 ML Lanes	18	10	0
2035 GP Lanes	3	16	14
2035 ML Lanes	28	0	0

In light of research showing that low income drivers use optional toll lanes less frequently than higher income drivers and the project's improvement of travel conditions in the managed lanes but not the general purpose lanes, a hard look must be given to whether this project has adverse effects by reducing the benefits received by low income drivers.

d. The Mitigation Measures Considered in the FEIS and Reevaluation Fail to Address the Adverse Environment Justice Effects.

C-77.9▶ The Reevaluation identifies two mitigation strategies that will be used to mitigate for the adverse effects of the tolling policy on low income communities: a cash payment option and a monitoring program to ensure that users can provide feedback on access and use of the system.

6

RESPONSE

C-77.8

While the Northwest Corridor Project should provide uncongested travel conditions for vehicles (including transit vehicles) in the managed lanes, it should also provide improved travel conditions in the general purpose lanes. Three of the goals of the project are to:

- improve transportation effectiveness of I-75 and I-575 to additional travel and to contribute to the improved performance of the regional system
- provide additional transportation choices or options that increase the capacity of I-75 and I-575
- improve the quality of life by improving mobility and minimizing effects to both natural resources and the built environment.

Meeting these goals provides the benefits of the Northwest Corridor Project.

The overall general purpose (GP) lane LOS is better with the added capacity of the managed lanes in the corridor. Without the managed lanes (the No-Build), low income populations would suffer a decreased LOS on the GP lanes, as would all the users in the corridor. In addition, with no choice to avoid congestion, low income populations using both single occupant vehicles and transit vehicles suffer from traffic congestion and associated travel time delays. While the frequency of priced managed lane use may be higher with higher income individuals, lower income individuals are likely to value the choice to avoid congestion.

As noted on page 8 of *Income-Based Equity Impacts of Congestion Pricing*, "Morallos (2006) found that, although limited, evidence from the successfully operating VPP projects clearly demonstrates that the most valued feature in tolling and pricing projects is that of providing people with a choice of whether to use priced lanes. Studies have shown that lower income individuals face the greatest financial harm when they are denied adequate travel choices. Lack of choice to pay a toll in exchange for reliable travel times can result in lost wages or late fees for daycare that could have been

COMMENT C-77 (con't)

C-77.9 (con't)

Neither of these mitigation measures addresses the actual nature of the adverse impact: lower income drivers cannot afford to use the managed lanes as often as higher income drivers.

In contrast, the following five mitigation strategies would address the adverse effect of low income driver's decreased ability to utilize the managed lanes and the benefits that come with it. None of these mitigation measures have yet been considered in the environmental review process. Any Record of Decision for this project must examine each of these potential mitigation measures and either commit to their implementation or explain why they will not be implemented. 40 C.F.R. §1505.2(c)(A Record of Decision must "state whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why they were not.")

Utilize a HOT Tolling Policy. All seven of the peer facilities identified in Table 8 of the Evaluation of Tolling Effects on Low-Income Populations Technical Memorandum allow some form of high occupancy access. High occupancy access provides low income drivers with an additional opportunity to receive the benefits of the managed lanes in spite of financial limitations. As referenced above, neither the sensitivity analysis, the Evaluation of Tolling Effects on Low-Income Populations Technical Memorandum nor the Toll Policy Memorandum addresses the environmental justice implications of changing the tolling policy from HOT3 to ETL.

Subsidize Transit Use in the Corridor. The Federal Highway Administration has already identified increasing transit usage as a strategy for mitigating the adverse effects of tolling policies on low income populations. See, Income Based Equity Impacts of Congestion Pricing: A Primer, Federal Highway Administration (Dec. 2008) at 19 ("Low-income transit riders can benefit significantly from toll-financed transit improvements, which are generally included in any pricing package."). This strategy was also used as part of the I-85 HOT lane conversion. Increasing transit service must be considered as a mitigation strategy even if it falls outside the purview of FHWA or Georgia DOT. See, Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulation, 46 Fed. Reg. 18026 (1981) at Question 19(b).

Dedicate Any Excess Toll Revenue Estimates to the Corridor. The environmental justice impacts of the project's tolling policy could also be mitigated by requiring any excess revenue from the project to be dedicated to subsidizing transit service or other investments in the corridor that would be available to lower income travelers. Table 8 of the Evaluation of Tolling Effects on Low-Income Populations Technical Memorandum indicates that similar policies are in place for several of other managed lane projects around the country, including policies that are codified in law[5]. Even if the project does

[5] RCW 47.66.090 (Washington), Fla. Stat. § 338.166 (Florida), Cal Sts & Hy Code § 149.6(e)(3) (California) and Minn. Stat. § 160.93 Subd. 2a(b) and (c) (Minnesota).

7

RESPONSE

avoided."

The purpose of the Northwest Corridor Project is to improve transportation effectiveness and provide additional transportation choices in the I-75 and I-575 corridors. The analysis shows that the GP lanes will typically operate better under the Preferred Alternative than under the No-Build Alternative. The managed lanes themselves will provide sustainable mobility for those who choose to use them as well as transit riders that will get to travel in the uncongested managed lanes for no additional cost.

C-77.9

Tolling was determined to adversely affect all populations, including low income populations. Low income populations would have equal access to the managed lanes; however, the frequency of the usage of the managed lanes by low income populations may be less than the frequency of usage by higher income populations. "Studies have shown that lower income individuals face the greatest financial harm when they are denied adequate travel choices. Lack of choice to pay a toll in exchange for reliable travel times can result in lost wages or late fees for daycare that could have been avoided." (*Income-Based Equity Impacts of Congestion Pricing*, page 8).

Priced managed lanes do not result in a disproportionately high effect on low-income populations. The impacts are not predominantly borne by a low income population and the effect is not appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-low-income population.

The mitigation effort is commensurate with the potential effects. The commitment for the State Road and Tollway Authority (SRTA) to include a cash-based option for tolling was a direct result of the FHWA primer analysis (*Income-Based Equity Impacts of Congestion Pricing*, page 6) which indicated that low income populations have greater need for cash-based options."When congestion pricing relies on an electronic cashless technology, households that do not

COMMENT C-77 (con't)

RESPONSE

C-77.9 (con't)

not generate significant toll revenue beyond what is required for debt service and operational costs, the existence of such a policy would be a useful mitigation measure should toll revenue exceed expectations or after the project's debt obligations are retire

Subsidize A Minimum Level of Managed Lane Access. Subsidizing a minimum lev of manage lane use by all drivers would also allow all drivers to receive some benefit from the project, even if their financial circumstances would not otherwise allow them use the lanes. This subsidy could be accomplished by allowing each registered user a small number of free trips in the managed lane per year or by providing an account cred that would offset the cost incurred in utilizing the lanes.

Set a Per Mile Toll Cap. Setting a limit on the maximum possible toll would also mitigate the environmental justice effects of tolling by capping the maximum possible price of the lanes. Limiting the amount of the toll will prevent lower income drivers fr being priced out of the managed lanes when tolls rise during periods of peak demand.

C-77.10▶ A more robust analysis of the Northwest Corridor's adverse effects on low income drivers, including a hard look at the actual usage data and a discussion of all feasible mitigation strategies, must be performed before the project's environmental review can be completed.

III. The Reevaluation Does Not Rectify the Shortcomings in the Cumulative Impacts Analysis for this Project.

C-77.11▶ Previous comments submitted regarding this project, including on the FEIS and draft Supplemental EIS, have raised concerns about the adequacy of the cumulative and indirect effects assessment for this project. There are numerous managed lane projects in metro Atlanta current Transportation Improvement Program[6] and many more in the region's long term Region Transportation Plan. A number of specific areas have been identified where these projects, whe operating in conjunction, are likely to have cumulative or indirect effects including transportation performance, air pollutants other than ozone and fine particulate matter, environmental justice and financing. However, these comments have been dismissed by pointi to consideration of these issues elsewhere, primarily in the Managed Lane System Plan or the region's conformity determination. These responses are insufficient.

As its purpose section makes clear, the MLSP and its "Social Equity and Environmental Effects Evaluation of Managed Lanes" was intended as "a high-level environmental scan"[7] to identify potential issues and that the more detailed analysis required by NEPA would occur late The cursory analysis contained in the MLSP may be sufficient to identify issues but falls well

[6] AR-ML-110, AR-ML-400, AR-ML-410, AR-ML-500, AR-ML-600, AR-ML-630, AR-ML-640, AR-ML-900 http://documents.atlantaregional.com/transportation/TIP_List_By_ARC_Number_03-15-13.pdf

[7] Social Equity and Environmental Effects Evaluation of Managed Lanes, Managed Lane System Plan, Georgia DOT (January 2010) at 1

8

have credit cards, bank accounts, or cannot afford large deposits may be unable to set up toll accounts, which may limit their use of these facilities."

In addition, SRTA is committed to providing transponders at no cost. Transponders and pre-paid cards can be obtained with cash at SRTA facilities and convenient locations such as grocery stores along the corridor. The pre-paid card can be purchased for a minor fee at convenient locations. The transponders are free at both the SRTA facilities and at convenient locations. For both cash-backed and credit card-backed Peach Pass accounts, the account holder must initially deposit $20 when the account is established, which can then be used to pay tolls. For the credit card-backed account, the account holder's card is charged $20 when the account balance falls below $10, bringing the total account balance back up above $20. For the cash-backed account, the account holder must monitor the account value to ensure that the balance is sufficient to pay tolls. If at any point the account balance falls below the level necessary to pay any tolls due, that account holder is in violation, and those tolls due will be collected according to the procedures outlined in SRTA's business rules. "In situations in which the purchase of a transponder presents a significant economic barrier, low-income travelers who cannot afford a transponder will face a regressive toll schedule. It is estimated that between 10 and 20 percent of the population is unable to overcome these barriers to transponder ownership (Parkany, 2005)" (*Income-Based Equity Impacts of Congestion Pricing,* pages 6-7).

SRTA will operate the managed lanes through a lease agreement with GDOT and will be responsible for operating the toll system including managing transponder accounts and setting toll rates. SRTA is constantly evaluating its business practices to best serve their customers. In addition, as tolling is relatively new to the region, a commitment was included to monitor the effects and conduct annual surveys to identify potential issues. SRTA continues to evaluate its outreach program to help educate the population and adjust its cash-based options as new information is forthcoming, with a particular emphasis on reaching the EJ

COMMENT C-77 (con't)

C-77.11

short of the "hard look" NEPA requires for a project's cumulative and indirect effects. Further, numerous assumptions relied upon in the MLSP (including the use of HOV to HOT conversions, the anticipated amount of public financing, and the traffic modeling utilized) have been abandoned or superseded. Accordingly, Georgia DOT is in the process of revising the entire plan as part of a "Managed Lane Implementation Plan."[8] This new study further undermines the adequacy of the MLSP as a valid analysis of cumulative and indirect effects of the multiple planned managed lane projects. A more comprehensive analysis of the cumulative and indirect effects of the planned managed lane projects, including the Northwest Corridor project, is required on at least the following issues: air quality impacts including air pollutants other than ozone and PM2.5, environmental justice effects on low income communities, traffic effects (such as where the managed lane projects connect or merge into general purpose lanes[9]), and the degree to which toll backed debt financing for multiple managed lane projects poses a financial risk to Georgia's finances.

Given the discussion of environmental justice issues above it is appropriate to discuss the MLSP's consideration of this issue in more detail. The MLSP's social equity analysis looks at public opinion surveys, focus groups, and analysis of transponder owners from other cities. The Plan also surveys demographic information for the areas in which managed lanes are planned in metro Atlanta. But the Plan does not address the research showing the pattern of disproportionate usage by higher income drivers, does not perform a regional version of the trip/income analysis found in the FEIS, nor does it discuss any possible mitigation strategies. Accordingly, the MLSP's environmental justice analysis is even more lacking than the Northwest Corridor's project-specific analysis.

With respect to the air quality issues, previous responses to comments have asserted that the cumulative and indirect air quality effects have been considered as part of the region's conformity determination. This argument fails for several reasons. First, the conformity determination looks at the air quality effects of all the projects in the transportation plan collectively and does not separate out the managed lane projects. Therefore, it is impossible to determine the amount of air pollution that is attributable to the cumulative effects of the managed lane projects versus all of the other projects in the TIP. Further, the conformity analysis only addresses ozone and fine particulate matter, so the cumulative and indirect effects for all other air pollutants (greenhouse gases, carbon monoxide, mobile source air toxics) are not considered.

[8] http://www.dot.ga.gov/informationcenter/programs/studies/managedlanes/Pages/default.aspx ("The MLIP study will update the financial plan for the previous MLSP's list of managed lane projects to reflect current funding constraints along with reducing the reliance on long-term toll concessions. Additionally, the MLIP will identify all capacity-adding projects where the use of managed lanes may be appropriate, along the interstate and other limited access facilities, and result in a newly prioritized list of managed lanes projects.")

[9] http://www.dot.ga.gov/informationcenter/programs/studies/managedlanes/Documents/Emerging%20Issues-Reversible%20Managed%20Lanes.pdf ("Because of connectivity issues, reversible managed lanes systems may lose some degree of utility when implemented across a network of facilities with directional splits that are not favorable for ease of transferability.")

9

RESPONSE

populations identified in the corridor.

- The ETL policy was chosen as the toll policy for the Northwest Corridor Project for the reasons outlined in the *Tolling Policy for the I-75 and I-575 Northwest Corridor Project Technical Memorandum*, which is Appendix A to the *Technical Memorandum Update - Evaluation of Tolling Effects on Low Income Populations*. By allowing certain vehicles to travel without paying a toll, it would be harder to manage the operations of the system to provide a reliable trip time. It would also be harder for the project to pay for debts incurred for the construction of the project.
- The Preferred Alternative provides a fixed guideway for transit vehicles and registered vanpools that can use the managed lanes at no additional charge. SRTA's business rules maintain that these vehicles will not be tolled when they pass under the toll collection equipment, so there is no required administrative activity associated with seeking reimbursement of tolls incurred, which is an additional benefit to transit. Information from the Georgia Regional Transportation Authority (GRTA) indicates that in 2012, based on current route structure, the ridership on the GRTA Xpress routes in the corridor that describes their racial or ethnic background as African American/Black, Asian, American Indian or Other ranges from approximately 23 percent on Route 491 to approximately 38 percent on Route 480. Information from Cobb Community Transit (CCT) indicates that in 2011 on the CCT and GRTA Xpress routes that utilize I-75 (Routes 10C, 100, 101,102, 480 and 481), and would be expected to shift at least part of their route onto the proposed managed lanes, the ridership ranges from 28 percent to 34 percent minority. The areas that are served by those routes are less than 30% minority population. Income information was only available from GRTA and indicated that with the current route structure; approximately 12 percent of the corridor ridership earns less than $50,000 annually. The percentage of riders with household incomes of $24,000 or less (US Department of Health & Human Services (HHS) 2012 poverty guideline for

COMMENT C-77 (con't)

The conformity determination is not, and was never intended to be, an adequate proxy for cumulative impacts analysis under NEPA.

With regard to the four topics identified above, a more robust analysis of the Northwest Corridor's cumulative and indirect effects must be performed before the project's environmental review can be completed.

IV. The Reevaluation Falls Short of FHWA's Best Practices for Considering Greenhouse Gas Emissions.

C-77.12▶ Although the Reevaluation contains a section focused on the GHG emissions from the project, its analysis is superficial and focuses far more on global, national, and statewide emissions than on the effects of the Northwest Corridor project. The Air Quality Technical Report contains the same minimal amount of information as the Reevaluation, only adding a section on "Mitigation for Global GHG Emissions" and "Local and State Measures to Reduce GHG Emissions." This cursory approach falls well short of best practices for considering the GHG effects of transportation projects.

In 2010, the Council on Environmental Quality issued preliminary draft guidance instructing agencies on how to consider GHG emissions in various contexts.[10] This guidance suggests that it would be appropriate to:

(1) quantify cumulative emissions over the life of the project;
(2) discuss measures to reduce GHG emissions, including consideration of reasonable alternatives; and
(3) qualitatively discuss the link between such GHG emissions and climate change.

Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions, Memorandum for Heads of Federal Departments and Agencies (Feb. 2010). The Reevaluation does not appear to have performed any of this recommended analysis.

C-77.13▶ A better example of GHG analysis for transportation projects is the Final Environmental Impact Statement for the Columbia River Crossing, a multimodal rail and highway project spanning the border of Oregon and Washington State. See, Columbia River Crossing FEIS & Final Section 4(f) Evaluation, Volume 1 at 3-439, 3-439-47 (Sept. 2011)[11]. The CRC FEIS differs from the Northwest Corridor Reevaluation by taking a detailed and comprehensive approach to explaining, analyzing, and summarizing all of the project's GHG effects.

For example, it utilizes the MOVES model to quantify the project's estimated GHG emissions and long term energy use. Id. at 3-443. Within this analysis is an explanation of the cause of the projected emissions, emission reductions and a comparison of the two preferred

[10] http://ceq.hss.doe.gov/nepa/regs/Consideration_of_Effects_of_GHG_Draft_NEPA_Guidance_FINAL_02182010.pdf
[11] http://www.columbiariverercrossing.org/Library/Type.aspx?CategoryID=35

10

RESPONSE

a 4-person household is $23,050) ranged from 0 percent on Route 481 to 8 percent on Route 480. Based on the available information, it appears that transit routes that currently utilize the I-75 corridor are utilized by environmental justice populations in meaningful percentages.

Transit vehicles and registered vanpools may experience the travel time savings and trip reliability that the managed lanes provide. This may make transit operations more reliable in the corridor. Transit routes can be adjusted to follow demand for service and over time balance cost and ridership to the extent practical.

It is likely that over time, transit routes will evolve to capitalize on the managed lanes and the improved travel times. Since transit trips often take longer than car trips, the improved travel time may allow some dispersal of transit-dependent EJ populations since their journey to work could be made shorter by use of transit in the managed lanes.

It is anticipated that all of the toll revenue will be needed to pay for the operation and maintenance of the facility and to pay off the debt associated with the construction of the project. If there are toll revenues in excess of the projections, they would not be expected to occur in the early years of the project, as the debt is structured over a thirty-five year period. If there are toll revenues in excess of the projections, the State may share in these excess revenues. The State's share of these excess revenues, if they occur, would be used to help fund other transportation projects in the statewide plan. Any excess funds will be returned and reprogrammed through the planning process for Title 23-eligible activities. The selection of those projects will be vetted publicly. Current State toll policy does not allow toll revenue to be used for transit and such a shift in policy would have to be approved by the SRTA Board and possibly the Georgia General Assembly. There is no state law that requires toll revenues to be spent on the particular corridor that generates the tolls.

COMMENT C-77 (con't)

alternatives. Id. The CRC FEIS describes the federal, state, and local policies designed to regulate and mitigate GHG emissions generally, analyzes potential project-specific mitigation and adaption measures, and assesses the project's resiliency to existing climate change projections. Id. at 3-441-47. The CRC project is expected to reduce emissions, and analyses were provided for both regional emissions and the actual project area. Id. at 3-444-45. The CRC FEIS' thorough consideration of GHG emissions quantifies the cause, considers the effects, and evaluates potential mitigation strategies. In doing so, it provides a concrete example of the GHG analysis that is possible for such projects and illustrates the Reevaluation's shortcomings.

The Reevaluation's consideration of GHG emissions should be supplemented to include a more detailed and comprehensive analysis quantifying the amount of short and long term GHG emissions, comparing the relative emissions of the various proposed alternatives, and examining emission reduction strategies.

V. NEPA Regulations and Case Law Require a Complete and Accurate Response to All Public Comments.

C-77.14▶ CEQ regulations require an agency to provide appropriate responses to comments raised by the public. 40 C.F.R. §1503.4. Courts have reasoned that these responses must accurately reflect the comments and provide a substantive and meaningful response.

> [H]ighway officials must give more than cursory consideration to the suggestions and comments of the public in the preparation of the final impact statement. The proper response to comments which are both relevant and reasonable is to either conduct the research necessary to provide satisfactory answers, or to refer to those places in the impact statement which provide them. If the final impact statement fails substantially to do so, it will not meet the minimal statutory requirements.

Lathan v. Volpe, 350 F. Supp. 262, 265 (W.D. Wash. 1972). When an agency "submits proposed regulatory changes for public comment and then offers no meaningful response to serious and considered comments by experts, that agency renders the procedural requirement meaningless and the EIS an exercise in 'form over substance.'" Western Watersheds Project v. Kraayenbrink, 620 F.3d 1187, 1206 (9th Cir. 2010).

Agency responses to previous public comments on the Northwest Corridor have fallen short of this standard, often inaccurately summarizing comments or ignoring significant information submitted as part of those comments. FHWA must give careful consideration of the information submitted herein and provide accurate and meaningful responses to these comments.

11

RESPONSE

- There is a relationship between the frequency of use and income, with higher income individuals using the lanes more often (*Income-Based Equity Impacts of Congestion Pricing*, page 12). However, the value an individual places on their time can influence driver behavior regardless of socio-economic standing and income. Evidence demonstrates individuals from a mix of household incomes use priced managed lanes (*Income-Based Equity Impacts of Congestion Pricing*, page 12). The managed lanes will provide preferential use to transit vehicles, as transit vehicles will ride for free in the managed lanes. Therefore, riders of all income levels using transit vehicles will benefit from the managed lanes. Additionally, as noted, the construction of the managed lanes provides a travel time benefit to the general purpose lanes. Finally, the construction of the managed lanes would not act to prevent anyone from utilizing the I-75/575 corridor. The managed lanes will not be the exclusive way to travel. The general purpose lanes will remain for use by all motorists - with improved travel times.
- Providing free trips in the managed lanes does not address the alleged position that certain motorists will not use the managed lanes because their financial circumstances would not otherwise allow them to use the lanes. Particularly when coupled with the suggestion that the managed lanes should be operated under a HOT3+ tolling policy, a substantial portion of the available capacity in the facility could be used for free. Since the free usage would be difficult to predict, it could impact overall use of the facility and the ability of the project to meet its financial goals.

  One of the goals of the project is to "provide cost-effective and affordable transportation improvements." The project is included in the fiscally-constrained Transportation Improvement Program (TIP) for the region as an ETL project. Under a HOT3+ policy some users would not pay to use the managed lanes, so less revenue would be generated compared to an ETL policy. If the project cannot meet its financial requirements from project revenues, the state (GDOT) must provide the difference. This could impact the potential to implement other transportation projects. A

COMMENT C-77 (con't)

VI. Conclusion

Thank you for your work in preparing the Reevaluation and your careful consideration of these comments. If you have any questions or concerns please contact me at bgist@selga.org or (404) 521-9900.

Sincerely,

Brian L. Gist

cc:

nwcpcomments@projectsolvemail.com

John Hancock
NW Corridor Project Manager
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW, 19th Floor
Atlanta, Georgia 30308

Heinz Mueller
US EPA Region 4
61 Forsyth Street
Atlanta, GA 30303

12

RESPONSE

HOT3+ tolling policy would also shift some of the burden of the cost of the project from the users of the managed lanes to taxpayers statewide since vehicles with three or more occupants would use the managed lanes but not pay for the use.

Allowing vehicles to use the managed lanes for free could result in operational issues as the number of vehicles in the managed lanes at a given time could not be managed. If this were to occur, the project would not meet one of its key purposes: "... improve mobility by reducing travel time and increasing reliability."

There is a project in the United States that provides a direct subsidy to low-income citizens. Metro ExpressLanes (http://www.metro.net/projects/expresslanes/) is a pilot, one-year demonstration program overseen by Metro, Caltrans and several other mobility partners to develop a package of solutions to improve traffic flow and provide enhanced travel options on the I-10 and I-110 freeways in Los Angeles County. The program includes the introduction of congestion pricing by converting High Occupancy Vehicle (HOV) lanes to High Occupancy Toll (HOT) lanes; the improvement of transit service and other alternatives to driving; the updating of transit facilities; and the improvement of parking in downtown Los Angeles. Metro ExpressLanes is primarily funded with a $210 million congestion reduction demonstration grant from the U.S. Department of Transportation. Tolling began November 10, 2012 on the I-110 and on February 23, 2013 on the I-10.

Eligible carpools travel toll-free and the Metro ExpressLanes are utilized by Bus Rapid Transit. In addition, the toll policy includes an Equity Program for low-income commuters. Residents of Los Angeles County with an annual household income (family of three or more) at or below $37,060 will qualify for a $25 credit when they set up their account. This credit can then be applied to either the transponder deposit or pre-paid toll deposit. The monthly $3 account maintenance fee will also be waived. For Peach Pass accounts, the cash-based option would have no minimum balance. The minimum credit card balance is $10.

COMMENT C-77 (con't)

APPENDIX A

		2018 LOS			2035 LOS		
		No Build	GP	ML	No Build	GP	ML
I-75 AM Peak	N of Hickory Grove Rd	F	F	n/a	F	F	n/a
	S of Hickory Grove Rd	F	F	A	F	F	B
	S of Big Shanty Rd	F	F	A	F	F	B
	S of I-575	F	F	A	F	F	B
	S of Allgood Rd	F	F	A	F	F	B
	S of SR 3 Conn/Roswell Rd	F	F	A	F	F	B
	S of Terrell Mill Rd	F	F	A	F	F	A
	S of I-285	D	D	A	E	E	A
	S of Akers Mill Rd	E	E	B	F	F	B
PM Peak	N of Hickory Grove Rd	F	F	n/a	F	F	n/a
	S of Hickory Grove Rd	F	F	A	F	F	B
	S of Big Shanty Rd	F	F	A	F	F	B
	S of I-575	E	E	A	F	F	C
	S of Allgood Rd	F	F	A	F	C	C
	S of SR 3 Conn/Roswell Rd	F	E	A	F	F	B
	S of Terrell Mill Rd	D	D	A	D	D	B
	S of I-285	D	D	A	D	D	A
	S of Akers Mill Rd	F	D	A	D	D	A
I-575 AM Peak	N of Sixes Rd	C	C	n/a	D	D	n/a
	S of Sixes Rd	D	D	A	F	F	A
	S of Towne Lake Pkwy	C	C	A	D	D	A
	S of SR 92	D	D	A	F	F	A
	S of Bells Ferry Rd	C	C	A	D	D	A
	S of Big Shanty Rd	E	E	A	E	E	A
	S of Barrett Pkwy	D	D	A	D	D	A
PM Peak	N of Sixes Rd	D	D	n/a	E	E	n/a
	S of Sixes Rd	F	F	A	F	F	B
	S of Towne Lake Pkwy	D	C	A	E	E	B
	S of SR 92	E	F	A	F	F	B
	S of Bells Ferry Rd	D	D	A	D	D	B
	S of Big Shanty Rd	E	E	A	F	E	C
	S of Barrett Pkwy	D	D	A	E	E	C

Attachment 2 Tables 26-31

13

RESPONSE

Since Peach Pass accounts with SRTA will not have a monthly maintenance fee, and cash-based Peach Pass accounts will not have a minimum balance, these environmental justice mitigation measures in the Metro ExpressLanes project would not be applicable to the Northwest Corridor Project.

- If a per mile toll rate cap were to be introduced it would limit the ability of GDOT and SRTA to manage the operational performance of the lanes. Dynamic pricing provides a mechanism to regulate facility demand, which allows flexibility to maintain minimum travel speeds regardless of the total demand in the corridor. If the toll rate were capped, then under congested conditions too many cars would use the managed lanes and reduce speeds, and therefore increase travel times. If this were to occur, the project would not meet one of its key purposes: "... improve mobility by reducing travel time and increasing reliability." A similar priced managed lane project, I-95 Express in Florida, has experienced challenges of operating with the constraint of toll rate boundaries or a cap. This constraint has proven to be such a serious limitation that there is consideration for removing the toll rate cap by the Florida Turnpike Authority that operates the system.

C-77.10

Traffic modeling has been performed as part of the Environmental Justice Technical Analysis included in *Technical Memo Update - Evaluation of Tolling Effects on Low Income Populations*. This effort constitutes a hard look at the data using available tools, and an analysis of potential adverse effects on low income drivers. In addition, the tech memo update references an FHWA report citing actual experience on priced managed lanes throughout the country, which demonstrates that drivers of all income levels use the managed lanes and surveys that show support for existing managed lanes facilities across income groups (*Income-Based Equity Impacts of Congestion Pricing*, page 8).

Attitudinal surveys concerning managed lanes were conducted as part of the Public Involvement process for both the Northwest

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	Corridor Project and the I-75 Express project (I-75 South). The Northwest Corridor surveys were conducted as part of the overall Public Involvement associated with the approval of the FEIS. These surveys were focused more on the general acceptance of the managed lanes concept. For I-75 Express (I-75 South) the survey effort was focused on the potential EJ communities in the corridor. For the Northwest Corridor Project one African-American, one Hispanic and thirty-six Caucasians responded. For the Northwest Corridor surveys, the key finding was that the majority (66%) would not be willing to pay a toll to save time off their travels though a very similar majority (63%) felt there was some positive aspect of the managed lanes. The inference may be that while they would not be willing to pay the toll themselves, they liked the concept, and the potential travel time savings from which they could benefit. The survey was much more detailed and focused on EJ for the I-75 Express project. Of the 105 respondents approximately 60 percent of the respondents were African American or Hispanic. Nearly 65 percent of the respondents earned less than $50,000 family income. The overall results of the survey were similar to the Northwest Corridor Project: general support for the concept, but somewhat lower anticipation of actually using the lanes. Only a very small proportion felt that "tolls were unfair," regardless of race or income. Lower income persons were more willing to pay higher tolls than higher income respondents. This is likely due to the perception by lower income respondents that they would use the lanes when they were really needed, and higher income persons would use them on a more regular basis. In both surveys the number of responses was low and may not be a representative sampling of the population. While income ranges were provided by most respondents, family size was not asked; therefore it is not known how many of the respondents are above or below the poverty threshold.

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	C-77.11 In December 2009, the State Transportation Board adopted a resolution that the *Metro-Atlanta Managed Lane System Plan* be approved as a guide for GDOT to use in developing individual managed lane projects within Metro Atlanta. The *Atlanta Regional Managed Lane System Plan (MLSP)*, which was published in 2010, was prepared recognizing that simply adding general purpose lanes will never completely address the congestion issues facing the region today. Instead of building more general purpose lanes in an attempt to address congestion issues, GDOT recognized that one affordable means to address congestion would be to provide commuters with an option that provides reliable trip times. The *Atlanta Regional Managed Lane System Plan* identifies a regional system of interconnected managed lanes throughout the Atlanta area. The regional system of managed lanes is of limited capacity, providing one or two travel lanes, sometimes in a reversible lane configuration and sometimes as bi-directional facilities. The facilities are proposed to be dynamically tolled, providing the opportunity to operationally manage system usage by varying the toll rate. Each individual project must be shown to have independent utility and the design of the managed lane system for each project will be vetted through the NEPA process. Following State Transportation Board adoption of the MLSP in 2009, individual projects in Tiers 1 and 2 from the MLSP were added to the Metropolitan Planning Organization's long range plan for the Atlanta region. Since that time, several managed lane projects have been advanced into the project development process. The FEIS and Reevaluation represent the NEPA analysis for the NWCP. <u>Air Quality</u> With regard to air pollutants other than ozone and PM2.5, it is assumed that you are referring to mobile source air toxics (MSATs). In 2001, EPA issued its first Mobile Source Air Toxics Rule, which identified 21 mobile source air toxic (MSAT) compounds as being hazardous air pollutants that required regulation. A subset of six of these MSAT compounds were identified as having the greatest influence on health and included benzene, 1,3-butadiene,

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	formaldehyde, acrolein, acetaldehyde, and diesel particulate matter (DPM). In February 2007, EPA issued the Final Rule for Control of Hazardous Air Pollutants from Mobile Sources, which generally supported the findings in the first rule and provided additional recommendations of compounds having the greatest impact on health. The rule also identified several engine emission certification standards that must be implemented. The EPA's 2007 Final Rule requires controls that will dramatically decrease MSAT emissions through cleaner fuels and cleaner engines. According to FHWA analysis, even if vehicle activity (vehicle-miles traveled, VMT) increases by 102 percent as assumed from 2010 to 2050, a combined reduction of 83 percent in the total annual emissions for the priority MSAT is projected for the same time period (FHWA *Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA*, December 6, 2012.). In FHWA's view, information is incomplete or unavailable to credibly predict the project-specific health impacts due to changes in MSAT emissions associated with a proposed set of highway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by the uncertainty introduced into the process through assumption and speculation rather than any genuine insight into the actual health impacts directly attributable to MSAT exposure associated with a proposed action. Because of the limitations in the methodologies for forecasting health impacts described, any predicted difference in health impacts between alternatives is likely to be much smaller than the uncertainties associated with predicting the impacts. Consequently, the results of such assessments would not be useful to decision makers, who would need to weigh this information against project benefits, such as reducing traffic congestion, accident rates, and fatalities plus improved access for emergency response, that are better suited for quantitative analysis (FHWA *Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA*, *Appendix C*, December 6, 2012.)

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	Under the Clean Air Act, states with areas in nonattainment for one or more of the National Ambient Air Quality Standards (NAAQS) must develop a State Implementation Plan (SIP) that addresses each pollutant for which it fails to meet the NAAQS. In order to receive federal transportation funds within a nonattainment area, the area must demonstrate through a federally mandated transportation conformity process that the transportation investments, strategies and programs, taken as a whole, contribute to the air quality goals defined in the SIP. *PLAN 2040* contains a conformity determination report (CDR). The CDR demonstrates that the region's transportation strategies meet federal air quality requirements. Cumulative impacts for air quality are considered via the regional emissions analysis associated with conformity as well as the regional assessment conducted in the FEIS Reevaluation. Table 3-2 of the *Air Quality Technical Report - 2013 Addendum* highlights the regional impacts of the project by comparing the regional emission burdens of criteria pollutants of concern (CO, NO_x, PM_{10}, $PM_{2.5}$ and HC) with and without the Preferred Alternative. This analysis is based on traffic projections developed using *PLAN 2040* data which includes all approved projects as defined by the MPO. As such, this study demonstrates the cumulative impact of the Preferred Alternative with all other approved projects. The Northwest Corridor Project is included in ARC's *PLAN 2040* RTP and FY 2012-2017 TIP (ARC, 2011c), which were adopted on July 27, 2011. The results of the emissions analysis for *PLAN 2040* demonstrate adherence to the established 20-county Motor Vehicle Emissions Budget. The conformity analysis was performed for the years 2016, 2020, 2030 and 2040. The analysis years meet the requirements for specific horizon years that the transportation plan must reflect as specified in 93.106(a)(1) of the *Transportation Conformity Rule* and specific analysis years that the regional emissions analysis must reflect per Section 93.118(b) and 93.118(d)(2). Since the eight-hour ozone standard attainment year falls outside of the *PLAN 2040* RTP horizon, a near-term year of 2016 was selected as the initial analysis year. This year is within five years of the conformity determination year of 2011, as suggested

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	by the August 13, 2010 proposed *Transportation Conformity Rule Restructuring Amendment* revision to 93.118(b). The FY 2012-2017 TIP is a direct subset of *PLAN 2040* RTP. The conformity determination for the FY 2012-2017 TIP includes the same set of projects; defined by their design concept, design scope and analysis years, as *PLAN 2040* RTP. The RTP and TIP are financially constrained consistent per 23 CFR Part 450 Subpart C (i.e., cost feasible). The funding source for construction and operation, if applicable, of all projects is identified and presented in Volume I, Appendix A. The FY 2012-2017 TIP also meets all other planning requirements including: • Each program year of the FY 2012-2017 TIP is consistent with the federal funding that is reasonably expected for that year; • Required state and local matching funds, and funds for projects funded entirely by state and/or local money, are consistent with the revenue sources expected over the same period; • The FY 2012-2017 TIP is consistent with the conforming long-range plan such that the regional emissions analysis performed for the long-range plan directly applies to the TIP; • The FY 2012-2017 TIP contains all projects which must be started in the TIP time frame to implement the highway and transit system envisioned by the long-range plan in each of its horizon years; • All FY 2012-2017 TIP projects that are regionally significant are part of the specific highway or transit system envisioned in the long-range plan's horizon years; • The design concept and scope of each regionally significant project identified in the FY 2012-2017 TIP are consistent with *PLAN 2040* RTP. Upon completion of the technical conformity analysis, ARC staff have determined that the *PLAN 2040* RTP and the FY 2012-2017 TIP together demonstrate compliance with the Clean Air Act as amended in 1990 in accordance with all conformity requirements as

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	detailed in 40 CFR Parts 51 and 93 (the Transportation Conformity Rule) and 23 CFR Part 450 (the Metropolitan Planning Regulations as established in SAFETEA-LU, source: http://www.atlantaregional.com/plan2040/documents--tools). The *PLAN 2040* RTP and the FY 2012-2017 TIP were approved by the Georgia Regional Transportation Authority on August 18, 2011 and the FHWA issued a conformity determination on September 6, 2011. As such, the Northwest Corridor Project is part of a conforming RTP and TIP, and the cumulative impacts of the project have been thus evaluated. The Northwest Corridor Project also was included in the positive conformity determination for Amendment 10 of the *Envision6* RTP. Environmental Justice With regard to environmental justice effects of tolling on low income communities, the FEIS cites the findings of the *Atlanta Regional Managed Lane System Plan, Technical Memorandum 9: Social Equity and Environmental Effects Evaluation* (HNTB, 2010) report, which concluded that environmental justice communities are not disproportionately impacted by managed lanes and that the congestion reduction resulted in the potential for air quality benefits. While the cumulative effect of the Atlanta Regional Managed Lane System on environmental justice populations in the study area is not anticipated to be disproportionate, some areas of concern do exist where the effects may be adverse. For example, the environmental review for the NWCP identified an adverse but not disproportionately high effect on environmental justice communities due to tolling. There is a commitment by GDOT and SRTA to provide mitigation for the potential adverse effects. Key methods of addressing these concerns include an educational campaign, inclusive payment methods (e.g. a cash payment option) and access to information regarding the operations and benefits of managed lanes. The SRTA has committed to include a cash-based option for tolling. This is a direct result of the FHWA primer analysis (*Income-Based*

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	*Equity Impacts of Congestion Pricing*, page 6) which indicated that low income populations have greater need for cash-based options."When congestion pricing relies on an electronic cashless technology, households that do not have credit cards, bank accounts, or cannot afford large deposits may be unable to set up toll accounts, which may limit their use of these facilities." In addition, SRTA is committed to providing transponders at no cost at its facilities. Transponders and pre-paid cards available to be purchased with cash will also be provided at convenient locations such as grocery stores along the corridor for a minor fee. "In situations in which the purchase of a transponder presents a significant economic barrier, low-income travelers who cannot afford a transponder will face a regressive toll schedule. It is estimated that between 10 and 20 percent of the population is unable to overcome these barriers to transponder ownership (Parkany, 2005)" (*Income-Based Equity Impacts of Congestion Pricing,* pages 6-7). SRTA will operate the managed lanes through a lease agreement with GDOT and will be responsible for operating the toll system including managing transponder accounts and setting toll rates. SRTA is constantly evaluating its business practices to best serve their customers. In addition, as tolling is relatively new to the region, a commitment was included to monitor the effects and conduct annual surveys to identify potential issues. SRTA continues to evaluate its outreach program to help educate the population and adjust its cash-based options as new information is forthcoming, with a particular emphasis on reaching the EJ populations identified in the corridor. The project is not likely to have a disproportionately high and adverse effect on environmental justice communities, with regard to air quality. Cumulative impacts for air quality are considered via the regional emissions analysis associated with conformity as well as the regional assessment that was conducted for this project and documented in the *Air Quality Technical Report - 2013 Addendum* (Parsons Brinckerhoff, 2013). This analysis is based on traffic

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	projections developed using *PLAN 2040* data which includes all approved projects as defined by the MPO. As such, this study demonstrates the cumulative impact of the Preferred Alternative with all other approved projects which, as previously discussed, includes projects in the *Atlanta Regional Managed Lane System Plan* that are reasonably foreseeable. Since the projects are in a conforming plan, they are determined to conform with the air quality goals of the area, thus are not likely to have a meaningful cumulative impact on regional air quality. The project is not likely to have a disproportionately high and adverse effect on environmental justice communities with regard to traffic. The section below provides more discussion of potential traffic impacts of the project. <u>Traffic</u> The project would not result in substantial shifts of traffic within the existing surface street system such that increases in traffic would be noticeable and/or require new traffic control measures. The project is projected to result in a 1 to 3 percent decrease in average daily traffic (ADT) on primary arterials that parallel I-75 and I-575 (Traffic Technical Report 2013 Addendum, Parsons Brinckerhoff, 2013). These traffic shifts are the result of the complex and interrelated factors caused by the limited new capacity in the I-75 and I-575 corridors. The construction of the managed lanes adds some additional capacity to the project area as a whole, and to I-75 and I-575 in particular. This added capacity would be expected to cause a shift in traffic from parallel facilities such as US-41/Cobb Parkway. This is logical due to overall improvements in travel time on I-75 and I-575 in both the managed and general purpose lanes. The shift, however, would not be expected to be one-to-one. Rather, less traffic would shift from the parallel primary arterials than is forecast in the managed lanes. This would cause a reduction in travel times for the general purpose lanes under the Preferred Alternative in comparison to the No-Build Alternative.

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	In the traffic analysis, some minor changes in traffic patterns were noted with the construction of the four new managed lane/local access interchanges on I-75. The new interchanges would add traffic to the cross streets at Terrell Mill Road, SR 3 Conn/Roswell Road, Big Shanty Road, and Hickory Grove Road. However the peak hour volumes are relatively small due to the single- or two-lane capacity of the managed lanes and the distribution of this traffic across 4 new interchanges. These volume increases were not substantial enough to require any overall improvements to the roadways beyond the immediate interchange ramps. Some minor volume changes were noted at the existing and planned managed lane interchange locations on I-75 due to redistribution to the new managed lane interchanges. None of these changes necessitated any changes in the existing roadway configurations. A modal shift of trips to transit vehicles was also noted in the analysis. This shift reduced the overall traffic volume in the corridor under the Preferred Alternative, while the number of trips remained constant. In addition, more trips were made in higher capacity transit vehicles. No development or redevelopment or substantial shifts in traffic on the existing surface street system are expected to be induced in the study area by the project. The nature of managed lane facilities requires that the per lane volumes in the facilities are lower in comparison to the overall per lane volume in the corridor to optimize travel time savings. As noted in the Purpose of the Project (FEIS page 1-8), reducing travel time and congestion, improving reliability, and enhancing connectivity are among the purposes of the project. In the FEIS (Table 4-6, page 4-10) the managed lanes are forecast to carry nine to twelve percent of the I-75 traffic volumes and seven to nine percent of the I-575 traffic volumes in 2035. The percentages are less under the reevaluation, but as noted these are impacted by the toll rates brought forward from the FEIS. The overall proportion of traffic in the managed lanes will be similar although slightly higher under GDOT's operational strategies under the reevaluation modeling.

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	The corridor operations improve under the Preferred Alternative, with better levels of service and travel times under the Preferred Alternative for both the managed lanes and general purpose lanes. These improvements focus on reliability for managed lane users and transit riders in the managed lanes. There are improvements for the general purpose lanes as well, but they are unlikely to generate indirect impacts for land use. The travel forecasting for the project in both the FEIS and the Reevaluation was conducted as conservatively as possible, and assumed that there were no connections to adjacent managed lanes projects on I-285 and I-75 south of I-285. Section 7 (Page 7-1 through 7-5) of the Reevaluation and Section 2.4 (Page 2-45 through 2-47) examine traffic operations where the managed lanes merge into and diverge from the general purpose lanes. Overall levels of service and travel times through the merge and diverge segments under the Preferred Alternative and No-Build are fairly consistent, with some minor degradation of service near 2035. GDOT has committed to monitor these situations and take appropriate steps to relieve any congestion. <u>Financial Risk</u> The ARC, which serves as the Metropolitan Planning Organization (MPO) for the Atlanta region, is required by the US Department of Transportation (USDOT) to develop a long range regional transportation plan (RTP) that covers a minimum 20-year time span. The plan must be updated every four years in air quality nonattainment areas. The RTP provides a framework to address anticipated growth. It provides a comprehensive statement of the future regional transportation needs and defines both short and long term transportation strategies and investments to improve the region's transportation system. The RTP contains the transportation improvement program (TIP), which is a financially constrained six-year program of improvements. Federal planning requirements require that the first four years of the TIP be balanced by year. Subsequent years of the TIP and the long-range element of the RTP are balanced by funding periods.

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	The entire managed lane system has not been designed to the point of being able to definitively identify the impacts of each component project. Not all component projects that comprise the proposed managed lane system, are included in the current Atlanta Regional Commission (ARC) *Regional Transportation Plan (PLAN 2040)* since the plan is financially constrained and based on current and reasonably foreseeable needs. Based on the anticipated funding scenario and funding availability, those projects in the Regional Transportation Plan should be within the financial capacity of the region to implement. As mentioned above, the RTP and the TIP are evaluated on a regular basis and revised as necessary. Components of the managed lane system not included in the RTP should, by the nature of their omission, not be considered reasonably foreseeable future actions and therefore not considered as part of the cumulative impact analysis. The State is implementing managed lanes in the region in a careful and studied manner. Not all of the projects identified in the Managed Lane System Plan are included in the TIP or RTP. The projects in the TIP and RTP have independent utility and do not depend on the implementation of other managed lane projects in order to provide meaningful benefits to the traveling public. The projects in the Managed Lane System Plan were grouped into tiers, with the Tier 1 projects being the projects with the highest priority. The Northwest Corridor Project was identified as a Tier 1 project. C-77.12 To date, no national standards have been established regarding Greenhouse Gases, nor has USEPA established criteria or thresholds for ambient GHG emissions pursuant to its authority to establish motor vehicle emission standards for CO_2 under the Clean Air Act. However, there is a considerable body of scientific literature addressing the sources of GHG emissions and their adverse effects on climate, including reports from the Intergovernmental Panel on Climate Change, the US National Academy of Sciences, and USEPA and other Federal agencies. The GHGs are different from other air pollutants evaluated in Federal environmental reviews because their impacts are not localized or regional due to their rapid dispersion into the global atmosphere, which is characteristic of these gases. The

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	affected environment for CO_2 and other GHG emissions is the entire planet. In addition, from a quantitative perspective, global climate change is the cumulative result of numerous and varied emissions sources (in terms of both absolute numbers and types), each of which makes a relatively small addition to global atmospheric GHG concentrations. In contrast to broad scale actions such as actions involving an entire industry sector or very large geographic areas, it is difficult to isolate and understand the GHG emissions impacts for a particular transportation project. Furthermore, presently there is no scientific methodology for attributing specific climatological changes to a particular transportation project's emissions. Under NEPA, detailed environmental analysis should be focused on issues that are significant and meaningful to decision-making.[1] FHWA has concluded, based on the nature of GHG emissions and the exceedingly small potential GHG impacts of the Preferred Alternative, as discussed in the FEIS Reevaluation and shown in Attachment 2 Table 23 of the Reevaluation, that the GHG emissions would not result in "reasonably foreseeable significant adverse impacts on the human environment" (40 CFR 1502.22(b)). The GHG emissions from the project build alternative would be insignificant, and would not play a meaningful role in a determination of the environmentally preferable alternative or the selection of the preferred alternative. More detailed information on GHG emissions "is not essential to a reasoned choice among reasonable alternatives" (40 CFR 1502.22(a)) or to making a decision in the best overall public interest based on a balanced consideration of transportation, economic, social, and environmental needs and impacts (23 CFR 771.105(b)). For these reasons, no alternatives-level GHG analysis has been performed for this project. The context in which the emissions from the Northwest Corridor Project would occur, together with the expected GHG emissions contribution from the project, illustrate why the project's GHG emissions would not be significant and would not be a substantial factor in decision making. Additionally, the Council on Environmental Quality (CEQ) guidance is in draft form and does not create any obligation for federal agencies.

COMMENT C-77 (con't)	RESPONSE
This space is intentionally blank.	C-77.13 The fact that some project sponsors around the country have voluntarily produced more detailed estimates of GHG emissions for their projects (like the Columbia River Crossing project) does not obligate all other projects to produce and publish a similar voluntary analysis. Also, the CRC GHG analysis was conducted in part to satisfy a Washington state requirement for project-level GHG analysis; Georgia does not have a similar requirement. C-77.14 40 CFR 1503.4(b) states that "All substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous), should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement." Comments were reviewed to identify substantive comments. Responses were provided to all comments. 40 CFR 1503.4(b) does not identify where in the document the comments should be attached. In the FEIS for the Northwest Corridor Project, the comments have been summarized in the text of the document. The comment letters, comment cards, emails, etc. received were all included in appendices for the FEIS. Volume 3, Appendix J contained the comments and responses for the SDEIS. Volume 4, Appendix K contained the comments and responses for the AA/DEIS. In both volumes, each copy of the comment correspondence (letter, comment card, etc.) is followed by the corresponding response letter that addressed the comment(s) in the correspondence and was mailed to the commenter. All comments and responses to all comments were included in both volumes, not just those deemed substantive. In the FEIS Reevaluation, a similar format was followed. The comment correspondence was included in Attachment 9. In this document, the comment responses were included opposite the comment correspondence, but a copy of the actual response letter was not included. Again, all comments and responses to all comments were included in both volumes, not just those deemed substantive.

COMMENT C-78	RESPONSE

N/W Corridor

an email sent by (Site Administrator) on 5 Apr 13 at 3:03pm

From: Lanie Hoover
To: nwcpcomments@projectsolvemail.com

C-78.1 ▶ The N/W Corridor is past due for improvements. Population growth in the northwest portion of Cobb County has been tremendous. I-75 is not only the main thoroughfare for commuters but also for intra-county and traveling motorist passing through Cobb County. Numerous studies have be done on the corridor, hopefully this plan will be implemented.

As a resident and worker in Cobb County and more particularly in the Town Center area, I urge you to proceed with the current managed lane plans.

Comments

C-78.1
Comment noted.

COMMENT C-79

Promenade, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, Georgia 30309-3592
Main: 404 815-3500
Fax: 404 815-3509
www.sgrlaw.com

SMITH, GAMBRELL & RUSSELL, LLP
Attorneys at Law

Phillip E. Hoover
Direct Tel: (404) 815-3769
Direct Fax: (404) 685-7069
pehoover@sgrlaw.com

April 5, 2013

VIA ELECTRONIC MAIL

Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
600 West Peachtree, N.W.
One Georgia Center, 19th Floor
Atlanta, Georgia 30308

Mr. John Hancock
Georgia Department of Transportation
600 West Peachtree, N.W.
One Georgia Center, 19th Floor
Atlanta, Georgia 30308

Re: Northwest Corridor Project, Public Comments on Final Environmental Impact Statement ("FEIS")

Dear Messrs. VanMeter and Hancock:

C-79.1 ▶ Our client, Atlanta Parkway Investment Group, Inc., owns and operates Parkway Center at 1800 and 1850 Parkway Place, Marietta, Georgia 30067, which is the largest commercial building along the I-75 corridor that will be impacted by the proposed widening of I-75. It is our understanding that the public comment period closes today, April 5, 2013; however, Atlanta Parkway only became aware of the FEIS on April 4, and is requesting that the public comment period be extended for an appropriate amount of time to allow Atlanta Parkway to conduct a meaningful review of the findings of the FEIS, and to submit comments. In order to facilitate our review of the FEIS, we are also requesting that DOT provide CAD or other digital files containing the analysis of the preferred alternatives.

Your consideration of this request is greatly appreciated and we look forward to working with you on this matter in the future.

Regards.

Sincerely,

Phillip E. Hoover

PEH/db
cc: John P. Bailey (by e-mail)
Abdul Amer (by e-mail)
Laurie Mckee-Harper (by e-mail)

SGR/10789718.1

RESPONSE

C-79.1
As mentioned above, the FEIS for the project was issued on October 21, 2011. The close of the public comment period for the FEIS was November 21, 2011. Following the approval of the FEIS in October 2011, several changes to the project occurred. The changes included changes to the financing, operations, maintenance, and tolling aspects of the project and adoption of a new regional transportion plan (PLAN 2040). These changes were analyzed in the FEIS Reevaluation. The April 5, 2013 date was the close of the public comment period for the FEIS Reevaluation.

Jones Lang LaSalle, the property management firm hired by the Atlanta Parkway Investment Group for the facilities at 1800 and 1850 Parkway Place, has been on the project mailing list since 2006. The newsletter and comment postcard for the FEIS Reevaluation, were mailed to representatives of Jones Lang LaSalle (Linda Bolan and John Kelliher) on March 18, 2013. Mr. Kelliher responded with comments on the DEIS. Ms. Boland and Mr. Kelliher were involved in the series of Station Area Development Planning meetings that were held in 2006.

Abdul Amer, who you also copied on your comment letter, has also been on the project mailing list since 2006. Project representatives have met with Mr. Amer on at least two occasions and shared information with him about the project during the development of the DEIS.

Following the publication of the DEIS, the build alternatives presented in that document were dropped from further consideration. A new build alternative, the Two-Lane Reversible Alternative was developed in response to public comments and reconsideration of the financial feasibility of the previously studied alternatives. This alternative was analyzed in the subsequent Supplement DEIS (SDEIS), which was released for review in October 2010. Following publication of the SDEIS, minor modifications were made to the design of the Two-Lane Reversible Alternative to further minimize potential impacts. The Two-Lane Reversible Alternative minimizes impacts to the Atlanta Parkway Investment Group, Inc.'s property at 1800 and 1850 Parkway Place to 0.05 acre.

COMMENT C-80	RESPONSE

C-80.1 ▶

-------- Original Message --------
Subject: Re: Georgia DOT Northwest Corridor Project (I-75 & I-575)
From: golou@juno.com
To: hansen-dederick@sycamoreconsulting.net
CC:

I am very concerned about how the project is going to affect Gospel Light Community Church on Freys Gin Rd. I don't believe it will take our church, but it looks as tough it will come so close to us that it could have a detrimental effect on us. Betty Hunter

--------- Original Message ---------
From: "Kristine Hansen-Dederick" <hansen-dederick@sycamoreconsulting.net>
To: <hansen-dederick@sycamoreconsulting.net>
Subject: Georgia DOT Northwest Corridor Project (I-75 & I-575)
Date: Tue, 26 Mar 2013 12:43:22 -0400

Good Afternoon:

The comment period associated with the Environmental Reevaluation has been extended. If you would like to submit a comment on the project, please do so by **April 5, 2013**.

Thank you-

Kristine

Kristine Hansen-Dederick, AICP
Sycamore Consulting, Inc.
195 Arizona Ave, Unit LW-4
Atlanta, GA 30307
P: 404-377-9147
F: 404-377-9091

C-80.1
As shown in Appendix H in Volume 2 of the FEIS, the proposed managed lanes will be built on the west side of I-75 in the vicinity of Freys Gin Road. Based on the conceptual plans, no property will need to be acquired from the church.

COMMENT C-81	RESPONSE

Public Comments on the Project Page 1 of 1

NWCP NORTHWEST CORRIDOR PROJECT

Public Comments on the Project
an email sent by (Site Administrator) on 4 Apr 13 at 9:25pm

From: Wes / Marsha Jones
To: <nwcpcomments@projectsolvemail.com>

C-81.1 ▶ Regarding the Northwest Corridor Project, I continue to disagree with the toll road concept. If we need to raise our gasoline tax, so be it.

Sincerely,

Wes W. Jones

Comments

https://ww3.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOVB... 4/5/2013

C-81.1
Opposition to tolling is noted. If the Preferred Alternative is selected, variable price tolling will be used to manage the use of the proposed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the variable price tolling. Tolls also shift a significant portion of the funding burden from taxpayers statewide to users of the proposed facility.

COMMENT C-82

RESPONSE

C-82.1 ▶

From: Jim Lassiter [mailto:lassiterproperties@yahoo.com]
Sent: Tuesday, March 26, 2013 5:23 PM
To: Kristine Hansen-Dederick
Subject: [SPAM]Re:]Re: Georgia DOT Northwest Corridor Project (I-75 & I-575)

Thank you so much for your reply. I have an issue I would like to address with someone regarding the closing of Chert Road near the intersection of Roswell Street, which I undestand was proposed somewhat as an afterthought as part of this project. First, is that now part of the plan and how might I get further information regarding that. By the way... noone at the City of Marietta seems to know anything about that.

Thanks in advance for any information?

Jim Lassiter
5665 Atlanta Highway
Ste. 103-359
Alpharetta, GA 30004
404-219-3825
Fax: 770-346-8744

From: Kristine Hansen-Dederick <hansen-dederick@sycamoreconsulting.net>
To: 'Jim Lassiter' <lassiterproperties@yahoo.com>
Sent: Tuesday, March 26, 2013 5:14 PM
Subject:]Re: Georgia DOT Northwest Corridor Project (I-75 & I-575)

Mr. Lassiter,

You may submit your comments by emailing us at nwcpcomments@projectsolvemail.com, by calling our Voice Mail Hotline at (404) 377-4012, or by mail to:
Darryl D. VanMeter, P.E.
State Innovative Program Delivery Engineer
Georgia Department of Transportation
One Georgia Center
600 West Peachtree NW, 19th Floor
Atlanta, Georgia 30308

Thank you,
Kristine

From: Jim Lassiter [mailto:lassiterproperties@yahoo.com]
Sent: Tuesday, March 26, 2013 5:10 PM
To: Kristine Hansen-Dederick
Subject: [SPAM]Re: Georgia DOT Northwest Corridor Project (I-75 & I-575)

Please adivse as to how to submit a comment.

Thanks,

C-82.1
As shown in Appendix H in Volume 2 of the FEIS, at the south end of Chert Road, the existing connection to Roswell Road will be eliminated with Chert Road terminating in a cul-de-sac with Halsey Drive. The existing connection of Chert Road to Roswell Road would be too close to the proposed Roswell Road managed lane intersection.

COMMENT C-83

NWCP Page 1 of 1

NWCP
an email sent by (Site Administrator) on 21 Mar 13 at 2:34pm

From: lecroyl
To: <nwcpcomments@projectsolvemail.com>

To whom it concerns-

RE: Northwest Corridor (I-75/I-575) Project Newsletter

C-83.1 ▶ We own property on Chert Rd at Gresham Rd. Having read this latest newsletter, I remain confused as to what changes will affect our property. To be more specific, the mail address is 116 Chert Rd, Marietta, which is located on the west side of Chert Rd, at the northern end of Chert Rd, but not touching Gresham Rd.

My questions are:
What type impact will will realized?
C-83.2 ▶ Will the increased noise level make the property less suitable as a dwelling, thus making it more difficult to rent?
C-83.3 ▶ Is increased commercialism expected in this area?
C-83.4 ▶ If this were your property, would you be more interested in selling it prior to the construction getting started or would you maintain ownership?

Thank you for your input.
Luther LeCroy

Comments

https://ww3.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOV... 3/22/2013

RESPONSE

C-83.1
As shown in Appendix H in Volume 2 of the FEIS, the proposed managed lanes will be built on the west side of I-75 in the vicinity of Chert Road. Based on the conceptual plans, property acquisition will be necessary from the parcels on the east side of Chert Road, but not from the parcels on the west side of Chert Road at the north end. At the south end of Chert Road, the existing connection to Roswell Road will be eliminated with Chert Road terminating in a cul-de-sac with Halsey Drive.

C-83.2
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels at the north end of Chert Road near Gresham Road on the west side of I-75 range from 71.0 dBA – 72.8 dBA. Under the No-Build Alternative, the predicted noise levels range from 71.6 dBA – 73.3 dBA. The predicted noise levels for the Preferred Alternative range from 74.5 dBA – 75.4 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #18 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-83 (con't)	RESPONSE
This space is intentionally blank.	C-83.3 As discussed in Sections 3.1.3, 5.2, and 5.18 of the FEIS, each local government in Georgia is required to prepare and implement a comprehensive plan consistent with Georgia Planning Act of 1989. The Atlanta Regional Commission, Cobb and Cherokee Counties, and the cities of Marietta, Smyrna, Acworth, Kennesaw, and Woodstock are responsible for developing land use plans, policies and strategies within the study area. The policies provide the basis for zoning, growth management and land use restrictions. The current regional plan and local comprehensive plans and their accompanying future land use maps portray a continued focus on higher density development capable of serving regional markets and trade areas and areas that provide the retail and service needs of several neighborhoods and communities, encouraging low to medium intensity office, retail and commercial service. They also focus residential development away from the areas immediately adjacent to I-75 and in areas along I-575 northeast of the I-75/I-575 interchange. These plans and policies were developed with public and local agency input and represent the communities' vision for the future. These plans and policies project continued long-term population and employment growth regardless of whether or not the Selected Alternative is implemented. Given the current and projected residential and employment trends and the future land use plans for the area, the Selected Alternative is not likely alter development trends in the area. C-83.4 In response to your question about selling your property, GDOT cannot provide property owners with advice on selling their property.

COMMENT C-84

From: Rube McMullan [mailto:rubemc@att.net]
Sent: Tuesday, March 26, 2013 6:00 PM
To: Kristine Hansen-Dederick
Subject: Re: Georgia DOT Northwest Corridor Project (I-75 & I-575)

C-84.1 ▶ My comment is a continuation of the concern I have expressed as relates to the noise and vehicle fumes which will make a bad situtaion worse by virtue of expanding I-75 in the vicinity of Blanche Dive, Marietta. I own several rental properties in this area very close to the interstate which are very difficult to rent due to the noise/fumes coming from I-75. Your

C-84.2 ▶ consideration of including these properties in the "displacement" group is appreciated.
1405 Blanche
1397 Blanche
1381 Blanche
1375 Blanche
1333 Banbarry
Thank you.
Rube McMullan

McMullan Properties
870 Old Canton Rd
Marietta, GA 30068\
RubeMc@att.net
(770) 977-1852-office
(404)372-5523-cell
(770) 971-3057-fax

From: Kristine Hansen-Dederick <hansen-dederick@sycamoreconsulting.net>
To: hansen-dederick@sycamoreconsulting.net
Sent: Tue, March 26, 2013 12:48:52 PM
Subject: Georgia DOT Northwest Corridor Project (I-75 & I-575)

Good Afternoon:

The comment period associated with the Environmental Reevaluation has been extended. If you would like to submit a comment on the project, please do so by **April 5, 2013**.

Thank you-
Kristine

Kristine Hansen-Dederick, AICP
Sycamore Consulting, Inc.
195 Arizona Ave, Unit LW-4
Atlanta, GA 30307
P: 404-377-9147
F: 404-377-9091

RESPONSE

C-84.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of Blanche Drive on the east side of I-75 south of Roswell Road range from 71.7 dBA – 76.0 dBA. Under the No-Build Alternative, the predicted noise levels range from 72.1 dBA – 76.3 dBA. The predicted noise levels for the Preferred Alternative range from 73.7 dBA – 77.2 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change. Noise wall #20 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

The noise analysis indicates that existing noise levels in the vicinity of Banberry Road on the west side of I-75 south of Roswell Road range from 70.2 dBA – 74.0 dBA. Under the No-Build Alternative, the predicted noise levels range from 70.7 dBA – 74.6 dBA. The predicted noise levels for the Preferred Alternative range from 67.3 dBA – 72.2 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change. Noise wall #19 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

As discussed in the Air Quality Technical Report of the FEIS Reevaluation the project is not predicted to cause a violation of the applicable National Ambient Air Quality Standards; has

COMMENT C-84 (con't)	RESPONSE
This space is intentionally blank.	C-84.1 (con't) been found not to be a project of air quality concern for particulate matter as determined through the interagency consultation process; and would have no meaningful impact on regional air quality and mobile source air toxics levels as compared to the No-Build Alternative. C-84.2 Blanche Drive is on the east side of I-75 and the proposed project will be built on the west side of I-75. No property acquisition is required from the parcels on Blanche Drive. On the west side of I-75 the project will be located within the exsting Right of Way, but it is anticipated that construction easement will be needed from the parcel on Banberry Road.

COMMENT C-85	RESPONSE

NWCP - I-75 / 575 managed lanes looks good Page 1 of 1

NWCP - I-75 / 575 managed lanes looks good

an email sent by (Site Administrator) on 4 Apr 13 at 10:50pm

From: Rsifen@aol.com
To: nwcpcomments@projectsolvemail.com

C-85.1 ▶ I have reviewed the information on the NWCP project. This looks like a great project to address our transportation needs, and it looks like a good deal for taxpayers.

Thanks

Ron Sifen

Comments

https://ww3.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOVB... 4/5/2013

C-85.1
Comment noted.

COMMENT C-86	RESPONSE

Northwest Corridor Project (4) Page 1 of 1

Northwest Corridor Project (4)
an email sent by (Site Administrator) on 2 Apr 13 at 3:20pm

From: Mary Lou
To: nwcpcomments@projectsolvemail.com

As someone who works in this corridor, shops int his corridor, and plays in this corridor, and lives just outside of this corridor, I have followed this project with great interest.

C-86.1 ▶ It seems well planned and there are exciting elements to it. I have seen reversible lanes used effectively in other metropolitan cities. Tolls are something I can live with. Minimizing traffic congestion is absolutely necessary. I support this concept.

Mary Lou Stephens
Marietta, GA

Comments

https://ww3.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOVB... 4/3/2013

C-86.1
Comment noted.

COMMENT C-87	RESPONSE

Re: Georgia DOT Northwest Corridor Project (I-75 & I-575) Page 1 of 1

Re: Georgia DOT Northwest Corridor Project (I-75 & I-575)
an email sent by (Site Administrator) on 5 Apr 13 at 3:08pm

From: David Welden
To: Kristine Hansen-Dederick <hansen-dederick@sycamoreconsulting.net>
Cc: nwcpcomments@projectsolvemail.com

C-87.1 ▶ Thank you, Kristine.
We have no comments to offer at this time.
David Welden, Protect Cobb

On Tue, Mar 26, 2013 at 12:46 PM, Kristine Hansen-Dederick <hansen-dederick@sycamoreconsulting.net> wrote:
Good Afternoon:

The comment period associated with the Environmental Reevaluation has been extended. If you would like to submit a comment on the project, please do so by **April 5, 2013**.

Thank you-
Kristine

Kristine Hansen-Dederick, AICP
Sycamore Consulting, Inc.
195 Arizona Ave, Unit LW-4
Atlanta, GA 30307
P: 404-377-9147
F: 404-377-9091

Comments

https://ww3.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOVB... 4/5/2013

C-87.1
Comment noted.

COMMENT C-88

(untitled) (5) Page 1 of 1

(untitled) (5)
an email sent by (Site Administrator) on 27 Mar 13 at 10:14am

From: Lewis Williams
To: "nwcpcomments@projectsolvemail.com" <nwcpcomments@projectsolvemail.com>

FirstName=C.L.
LastName=Williams
Address=105 Walnut Hall Cir.
2ndLineAddress=Woodstock, Ga 30189
EmailAddress=lewiswilliams@bellsouth.net
Comments=Your e-mail link did not work. My question was:
C-88.1 ▶ Did you consider dedicated express bus lanes?
Seems that adding reversible lanes may relieve some congestion, but would not impact the # of cars on the road.
submit=Submit

Comments

https://ww3.projectsolve2.com/eRoom/PBQDAtlanticDistrict/NWCorridorI-75-I-575HOV... 3/28/2013

RESPONSE

C-88.1
Dedicated express bus lanes as a stand-alone alternative were eliminated from consideration during the Northwest Connectivity Study prepared by the Georgia Regional Transportation Authority. Dedicated express bus lanes would cost the same to build as the Selected Alternative, but would not achieve full utilization of the managed lanes. There would not be enough buses to fill the lanes. In the Selected Alternative, buses will be able to travel in the free-flowing managed lanes without paying a toll. In addition, the excess capacity can be sold to drivers of passenger cars willing to pay a toll. Variable price tolling will be used to manage the use of the managed lanes. While the general purpose lanes may continue to experience congestion, the proposed lanes will remain uncongested due to the tolling. And by allowing single-occupant vehicles to use the lanes if they pay a toll, the managed lanes should not experience the "empty lane syndrome" that HOV lanes often experience and dedicated express bus lanes would experience.

As shown in Table 4-1 in the Traffic Technical Report of the FEIS Reevaluation, in general the Selected Alternative is projected to slightly reduce the number of vehicles in the existing general pourpose lanes compared to the No Build as some traffic is projected to shift from the general purpose lanes to the managed lanes.

COMMENTS AND RESPONSES

ADDITIONAL SOUND BARRIER OUTREACH

March 18 – April 5, 2013

COMMENT C-89	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: Mitch Almond

Address: 20 Manuel Dr
Marietta Ga, 30066

Do you support the potential noise wall? ☑ Yes ☐ No

C-89.1 ▶ Do you have any comments about the potential noise wall?

It's extremely to loud and getting Worst.

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☑ Yes ☐ No

Phone number: (770) 256-4736

Email Address: MitchonAlmond@aol.com

Signature: Mitch Almond

Date: 3-23-2013

Georgia Department of Transportation

Please respond by March 30, 2013

C-89.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-90

RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: Craig Austin

Address: 60 Manuel Dr

Do you support the potential noise wall? ☒ Yes ☐ No

Do you have any comments about the potential noise wall?

C-90.1 ▶ Definite Yes. Manuel Dr. is already noisy from I-75 traffic

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☐ Yes ☒ No

Phone number:

Email Address: craigaustin@bellsouth.net

Signature:

Date: 3-20-13

Georgia Department of Transportation

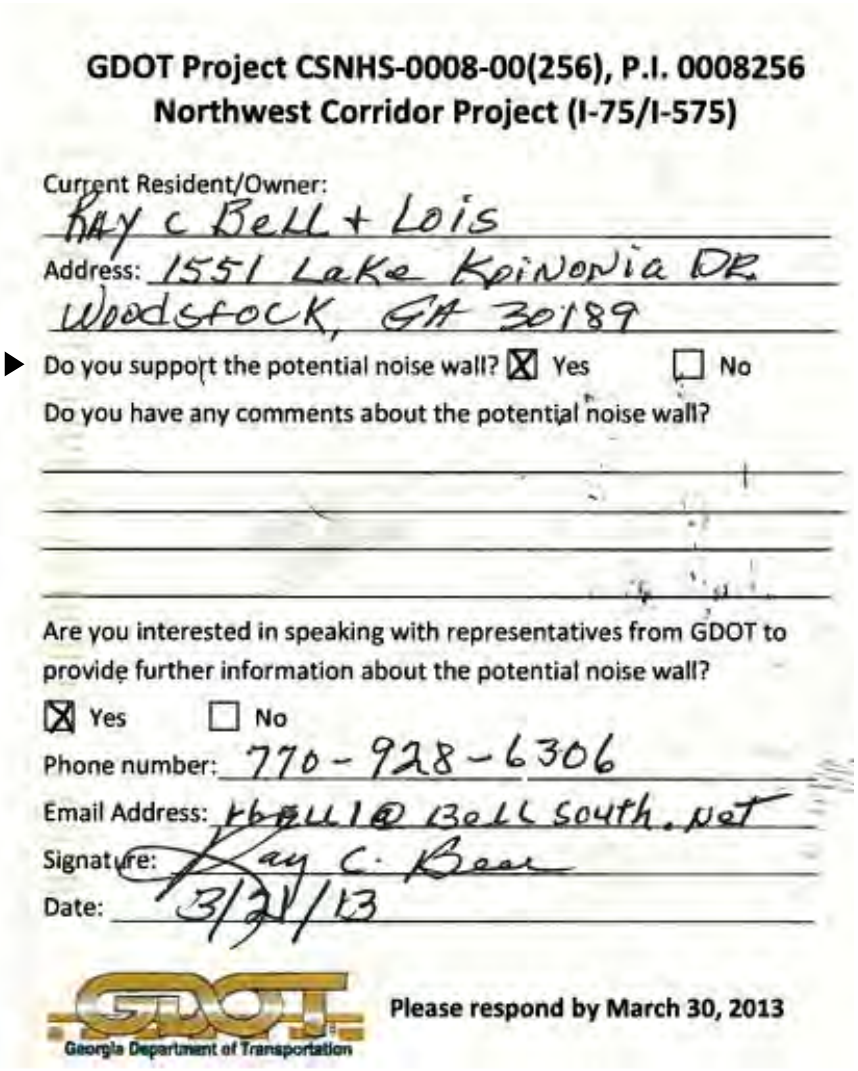
Please respond by March 30, 2013

C-90.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-91	RESPONSE



GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner:
Ray C Bell + Lois
Address: 1551 Lake Kpinonia DR.
Woodstock, GA 30189

C-91.1 ▶ Do you support the potential noise wall? ☒ Yes ☐ No

Do you have any comments about the potential noise wall?

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☒ Yes ☐ No

Phone number: 770-928-6306
Email Address: rbell1@bellsouth.net
Signature: Ray C. Bell
Date: 3/21/13

Georgia Department of Transportation

Please respond by March 30, 2013

C-91.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-92	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008258
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: Alan Bourdeau

Address: 80 Manuel Drive
Marietta, GA 30066

Do you support the potential noise wall? ☑ Yes ☐ No

C-92.1 ▶ Do you have any comments about the potential noise wall?
It will be great to have a noise wall - can't even sit on the deck now because of the traffic noise.

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☐ Yes ☑ No

Phone number:

Email Address: Alan Bourdeau

Signature: Alan Bourdeau

Date: 5/27/13

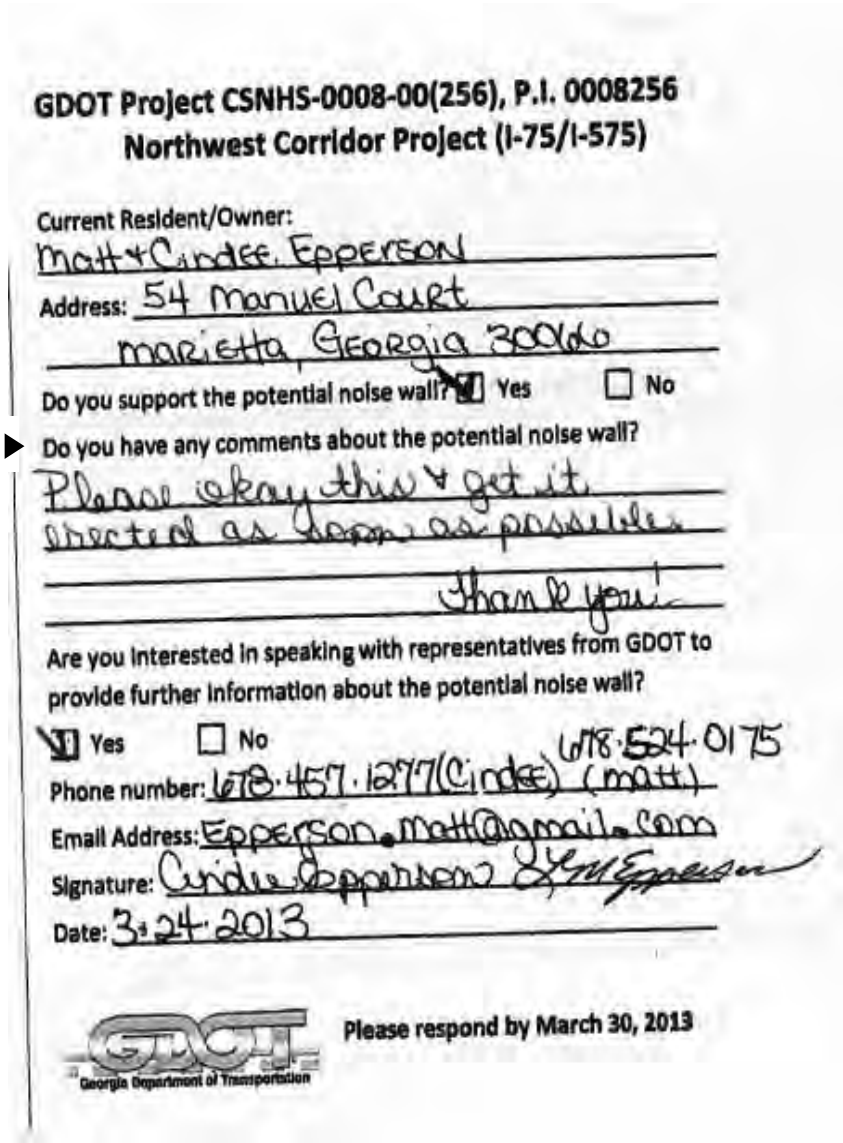
Please respond by March 30, 2013

C-92.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-93	RESPONSE



GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner:
Matt + Cindee Epperson
Address: 54 Manuel Court
Marietta, Georgia 30064

Do you support the potential noise wall? ☒ Yes ☐ No

C-93.1 ▶ Do you have any comments about the potential noise wall?
Please okay this & get it
directed as soon as possible.
Thank you!

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☒ Yes ☐ No

Phone number: 678.457.1277 (Cindee) 678.524.0175 (Matt)
Email Address: Epperson.matt@gmail.com
Signature: Cindee Epperson Matt Epperson
Date: 3.24.2013

Please respond by March 30, 2013

Georgia Department of Transportation

C-93.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-94	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner:
Randi Martinez

Address: 160 Manuel Dr.
Marietta, GA 30066

C-94.1 ▶ Do you support the potential noise wall? ☒ Yes ☐ No

Do you have any comments about the potential noise wall?

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☒ Yes ☐ No

Phone number: 561-246-6019

Email Address: rkmartinez285@gmail.com

Signature: Randi Mtz

Date: 3-24-13

GDOT Georgia Department of Transportation

Please respond by March 30, 2013

C-94.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-95	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: Cornelia Ojukwu

Address: 158 Bells Ferry Rd.
Marietta Ga 30066

C-95.1 ▶ Do you support the potential noise wall? ☑ Yes ☐ No

Do you have any comments about the potential noise wall?

How I can have a phone conversation and hear them.

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☐ Yes ☐ No

Phone number: _____

Email Address: _____

Signature: _____

Date: _____

Georgia Department of Transportation

Please respond by March 30, 2013

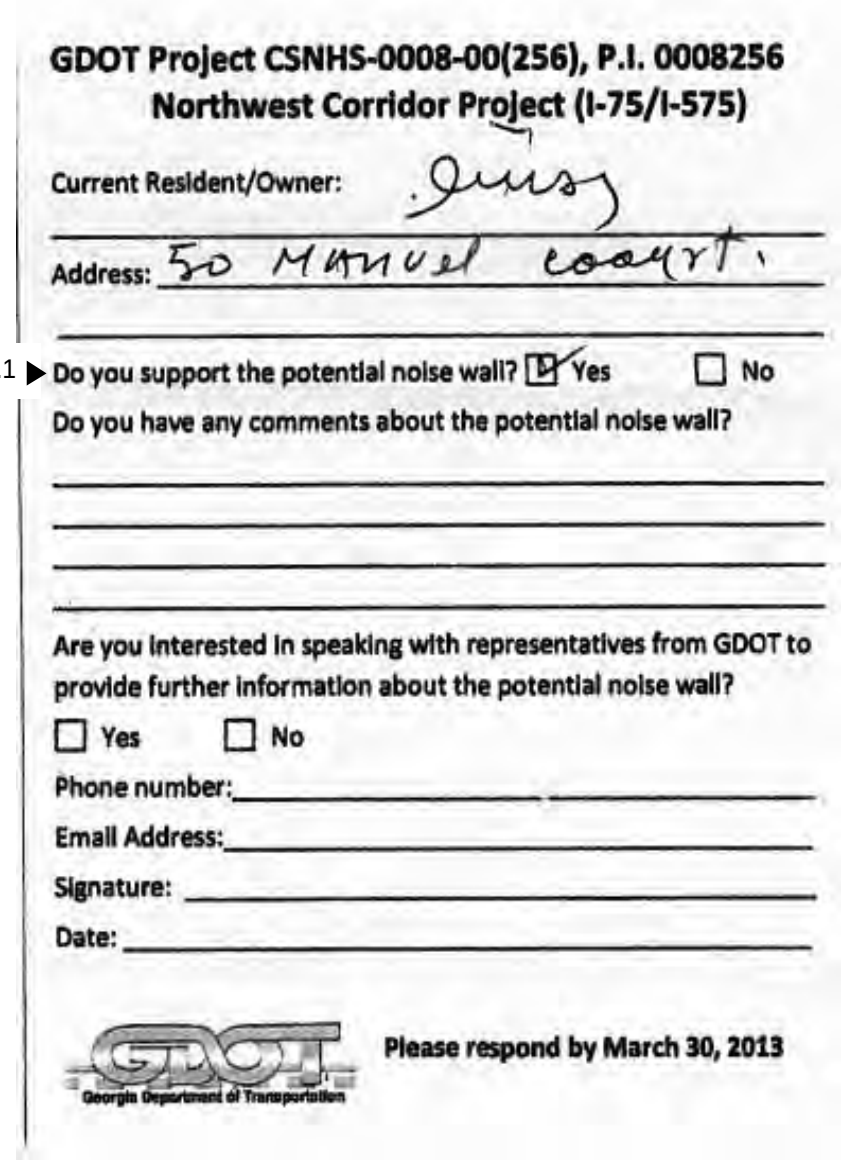
C-95.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-96

RESPONSE



GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: Jerry

Address: 50 Manuel court.

C-96.1 ▶ **Do you support the potential noise wall?** ☑ **Yes** ☐ **No**

Do you have any comments about the potential noise wall?

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☐ **Yes** ☐ **No**

Phone number:

Email Address:

Signature:

Date:

Georgia Department of Transportation

Please respond by March 30, 2013

C-96.1

The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-97	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner:
Gail Rakestraw

Address: 90 Manuel Dr
Marietta, GA 30066

C-97.1 ▶ Do you support the potential noise wall? ☑ Yes ☐ No

Do you have any comments about the potential noise wall?
Can't wait!!! Thank you

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☐ Yes ☑ No

Phone number:

Email Address:

Signature: Gail Rakestraw

Date: 3-29-13

Georgia Department of Transportation

Please respond by March 30, 2013

C-97.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-98	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: Liz Q. Ragan / 250 Manuel Ct Marietta, GA 30066

Address: 1193 Parkview Lane Kennesaw, GA 30152

C-98.1 ▶ Do you support the potential noise wall? ☑ Yes ☐ No

Do you have any comments about the potential noise wall?
The noise wall is extremely necessary. a partial wall was just put up at an angle to my house & it has made a big difference in/traffic noise.

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?
☑ Yes ☐ No

Phone number: 678-777-3595

Email Address: Liz@Lizreagan.com

Signature:

Date: 3/19/13

I implore you to put a noise wall behind my house!

Please respond by March 30, 2013

Georgia Department of Transportation

C-98.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-99	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner:
Resident
Address: 2825 Windy Hill Rd SE

C-99.1 ▶ Do you support the potential noise wall? ☒ Yes ☐ No

Do you have any comments about the potential noise wall?
no comments

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?
☐ Yes ☒ No

Phone number:
Email Address: foxy7699jre@gmail
Signature:
Date: 4-2-13

GDOT Georgia Department of Transportation

Please respond by March 30, 2013

C-99.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of Leland Drive on the east side of I-75 north of Windy Hill Road range from 62.4 dBA – 73.0 dBA. Under the No-Build Alternative, the predicted noise levels range from 62.4 dBA – 73.3 dBA. The predicted noise levels for the Preferred Alternative range from 61.9 dBA – 73.1 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #38 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-100	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: SIMA ENTERPRISES

Address: 2757 Orchard Knob
Atlanta, Ga 30339

C-100.1 ▶ Do you support the potential noise wall? ☒ Yes ☐ No

Do you have any comments about the potential noise wall?

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☐ Yes ☒ No

Phone number: (770) 952-0052

Email Address:

Signature: P. Patel

Date: 3-21-2013

Georgia Department of Transportation

Please respond by March 30, 2013

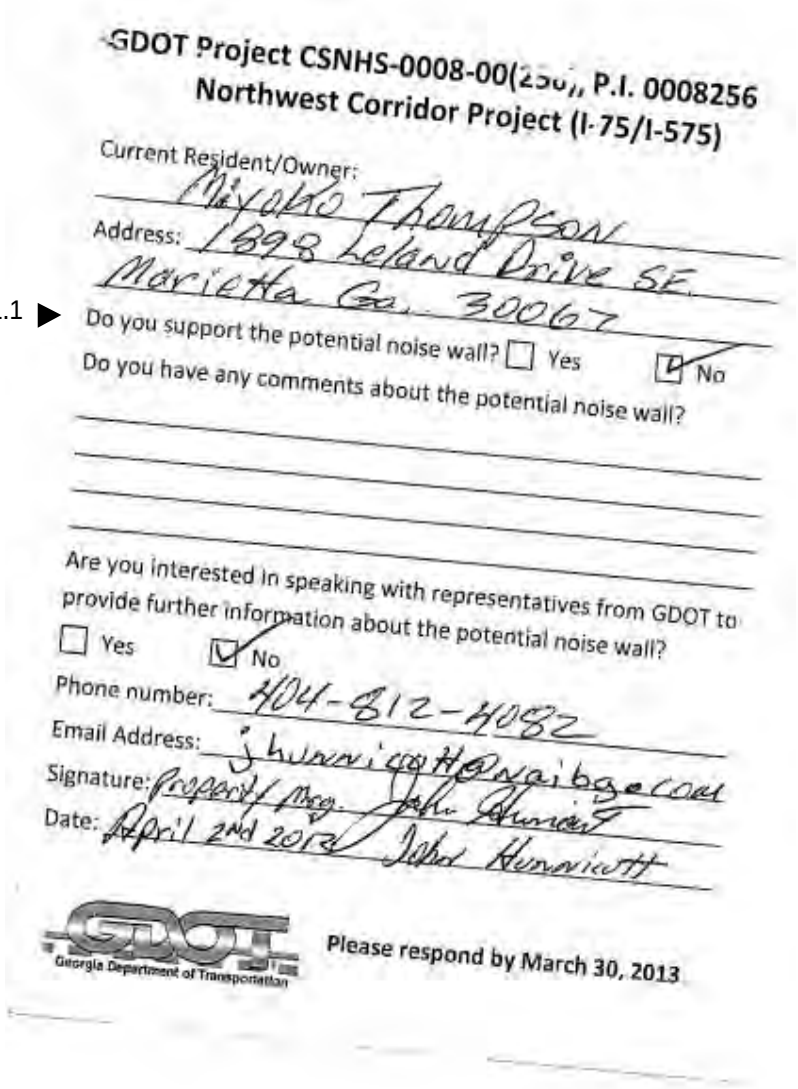
C-100.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of Leland Drive on the east side of I-75 north of Windy Hill Road range from 62.4 dBA – 73.0 dBA. Under the No-Build Alternative, the predicted noise levels range from 62.4 dBA – 73.3 dBA. The predicted noise levels for the Preferred Alternative range from 61.9 dBA – 73.1 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #38 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-101	RESPONSE

C-101.1 ▶



GDOT Project CSNHS-0008-00(25[illegible], P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: Miyako Thompson
Address: 1898 Leland Drive SE
Marietta Ga. 30067

Do you support the potential noise wall? ☐ Yes ☑ No

Do you have any comments about the potential noise wall?

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☐ Yes ☑ No

Phone number: 404-812-4082
Email Address: jhunnicutt@naibg.com
Signature: Property Mgr. John Hunnicutt
Date: April 2nd 2013 John Hunnicutt

GDOT Georgia Department of Transportation

Please respond by March 30, 2013

C-101.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of Leland Drive on the east side of I-75 north of Windy Hill Road range from 62.4 dBA – 73.0 dBA. Under the No-Build Alternative, the predicted noise levels range from 62.4 dBA – 73.3 dBA. The predicted noise levels for the Preferred Alternative range from 61.9 dBA – 73.1 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #38 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-102	RESPONSE

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner:
Brenda Turner Wilkes
Address: 68 Olive Circle, SW
Marietta, GA 30060

Do you support the potential noise wall? ☒ Yes ☐ No

C-102.1 ▶ Do you have any comments about the potential noise wall?
Re: 1561 Bells Ferry Rd., Mtta, GA 30066
Glad to hear you are considering this. Was told by two real estate people that our prop had lost value due to the noise from I-75.

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☐ Yes ☒ No

Phone number: 770-436-4482
Email Address: brndwlks@bellsouth.net
Signature: Brenda Turner Wilkes
Date: March 21, 2013

Georgia Department of Transportation

Please respond by March 30, 2013

C-102.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-103

RESPONSE

C-103.1 ▶

GDOT Project CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project (I-75/I-575)

Current Resident/Owner: Michael Wood

Address: 70 Manuel Dr.
Marietta GA 30066

Do you support the potential noise wall? ☒ Yes ☐ No

Do you have any comments about the potential noise wall? I Strongly Support the Sound Wall being Built

Are you interested in speaking with representatives from GDOT to provide further information about the potential noise wall?

☒ Yes ☐ No

Phone number: 770-833-8785

Email Address: Wood70@Comcast.Net

Signature: [signature]

Date: 3/22/13

GDOT Georgia Department of Transportation

Please respond by March 30, 2013

C-103.1
The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

COMMENT C-104	RESPONSE

C-104.1

C-104.1

The Project Team has analyzed the noise associated with existing and proposed conditions in the project corridor. The results of this analysis can be found in the Noise Technical Report of the FEIS Reevaluation. The noise analysis indicates that existing noise levels in the vicinity of the Manuel Drive subdivision on the west side of I-75 south of I-575 range from 67.0 dBA – 77.3 dBA. Under the No-Build Alternative, the predicted noise levels range from 67.9 dBA – 78.2 dBA. The predicted noise levels for the Preferred Alternative range from 68.0 dBA – 77.6 dBA. For reference, a 3 decibel change in the noise level generally represents a barely noticeable change.

Noise wall #10-11 was analyzed to provide noise mitigation along I-75 at this location. The analysis determined that a wall at this location would be feasible and cost effective.

A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final design and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers.

Appendix C Georgia Department of Transportation Toll Policy

DEPARTMENT OF TRANSPORTATION
STATE OF GEORGIA

INTERDEPARTMENTAL CORRESPONDENCE

FILE CSNHS-0008-00 (256)
Northwest Corridor Project
Cobb, Cherokee Counties
P.I. No. 0008256

OFFICE Innovative Program Delivery/
Division of Public Private Partners

DATE November 20, 2012

FROM Gerald Ross, Chief Engineer/P3 Director

TO Keith Golden, P.E., Commissioner
Toby Carr, Director of Planning

SUBJECT **Northwest Corridor Project Toll Policy Recommendation**

The purpose of this memo is to request a confirmation on the selection of the Express Toll Lane (ETL) policy for the Northwest Corridor P3 project in lieu of High Occupancy Toll Lanes (HOT3+) policy.

As you are aware, the procurement of the Public-Private Partnership (P3) toll concession approach for the project was cancelled in December 2011. In March 2012, the project was re-launched as a Design-Build-Finance (DBF) P3 procurement. In order to advance the project, a confirmation of the decision on a tolling policy must be made given these changes. A Toll Policy Technical Memorandum that discusses the advantages and disadvantages of the Express Toll Lane (ETL) and the High Occupancy Toll Lanes (HOT3+) policy is attached for consideration.

On June 29, 2012, Congress passed the Moving Ahead for Progress in the 21st Century Act (MAP-21), scheduled to take effect on October 1, 2012. MAP-21 changed the law significantly by expanding the scope of permitted tolling on the Interstate System by removing some of the previous restrictions and streamlining the process.

While HOT3+ does encourage HOV formations; overall ETL is less costly to implement, easier and less costly to operate and enforce, generates higher revenues, and carries less revenue risk than HOT3+. Therefore, it is my recommendation that the tolling policy for the Northwest Corridor Project be ETL which is in conformity with what we currently know about the new provisions of MAP-21.

If additional information is needed, please contact Darryl VanMeter at 404-631-1703 or John Hancock at 404-631-1315.

Concurrence: _____ 12-6-12
Keith Golden, P.E., Commissioner — Date

Concurrence: _____ 12/3/12
Toby Carr, Director of Planning — Date

GR:jdh

Attachment: As stated

cc: Johnny Floyd, Chairman, State Transportation Board
Brandon Beach, State Transportation Board
Jeff Lewis, State Transportation Board
Darryl VanMeter, State Innovative Program Delivery Engineer
Chip Meeks, P3 Administrator
General Files

Technical Memorandum

Evaluation of the Tolling Policy for the I-75 and I-575 Northwest Corridor Project

Introduction

The decision on the tolling policy for the I-75 and I-575 Northwest Corridor Project (the Project) has implications for system-wide managed lane consistency and operations, financial feasibility and environmental documentation in accordance with the laws, regulations, and statutes that fall under the umbrella of the National Environmental Policy Act of 1969 (NEPA), in particular Executive Order 12898 on Environmental Justice (EJ). The two toll policies under consideration for the Project are Express Toll Lanes (ETL) and High-Occupancy Toll (HOT) lanes. The ETL and HOT toll policies differ in terms of vehicle eligibility, that is, which vehicles are required to pay to use the lanes, and which vehicles can use the lanes at no charge under that policy. The purpose of this memorandum is to provide a summary of these two separate tolling policies and to highlight key advantages associated with each.

Toll Policy Definitions

HOT3+ is a managed lane designation where vehicles with 3 or more occupants are permitted in the lanes at no charge, while vehicles with only 1 or 2 occupants can access the lanes only by paying a toll. ETL is a managed lane designation in which all vehicles in the managed lanes pay a toll.

With either HOT3+ or ETL, free managed lane eligibility can potentially be extended to specific types of vehicles such as transit vehicles, emergency vehicles and military vehicles, among others. GDOT anticipates that both the HOT3+ and ETL policy alternatives for the Project will allow Exempt Vehicles (registered transit vehicles, emergency vehicles, military vehicles, maintenance vehicles and school buses) to use the managed lanes without paying a toll. Detailed definitions of these Exempt Vehicles can be found in the I-75 and I-575 Northwest Corridor Concept of Operations.

Toll Policy Comparison

The following discussion provides additional details on both of these toll policies. However, the two key issues for consideration in selecting a preferred toll policy are managed lane operations and revenue-generating potential. These issues have significant implications for the financial viability of the Project and are described in more detail below, along with other similarities and differences between the two toll policies.

<u>Similarities between HOT3+ and ETL</u>

Both tolling policies achieve the goal of providing reliable travel times in the I-75 and I-575 corridor, as toll rates are set to maintain minimum operating speeds of 45 mph. By providing reliable travel times, the Project will introduce a valuable mobility option in the corridor and increase travel choices. The Project will add new capacity to the corridor with benefits accruing to general purpose lanes. Both HOT3+ and ETL tolling policies for the managed lanes will

provide equal opportunities to accommodate regional growth and anticipated increases in travel demand. Both policies are also consistent with regional transportation planning initiatives, including GDOT's Managed Lane System Plan (MLSP) and the latest Regional Transportation Plan, *Plan 2040*, from the Atlanta Regional Commission. The Project is included in both the MLSP and *Plan 2040*. In addition, both HOT3+ and ETL are explicitly mentioned as potential tolling policies in the MLSP. Finally, both HOT3+ and ETL tolling policies are in line with, and support, the purpose and need established for the Project as described in the Supplemental Draft Environmental Impact Statement (SDEIS). Following the publishing of the SDEIS, a decision was made based on the financial feasibility of the Project to use ETL as the toll policy. The Final Environmental Impact Statement (FEIS) includes an analysis of the ETL toll policy.

Executive Order 12898 on Environmental Justice dictates that federal agencies, through their programs, policies and activities, must to the extent practicable identify and address disproportionately high and adverse human health or environmental effects to minority and low-income populations. As part of the FEIS, an analysis was conducted to determine the effects of toll policies on low-income populations in the corridor. Through this analysis, which is documented both in the FEIS, and in an EJ technical memorandum, it has been demonstrated that the ETL toll policy would not likely result in disproportionately high and adverse impacts to these communities. In addition, studies of similar facilities in operation throughout the country also show no disproportionately high and adverse impacts to low-income populations.

Differences between HOT3+ and ETL

The two policies differ in three areas as described below:

1. **Revenue-Generating Potential**

   Establishing a viable tolling framework is critical in providing financial assistance for future improvements, assisting in bond payments, and contributing towards operation and maintenance of the facility. ETL is projected to provide higher revenue than a HOT3+ policy. ETL also minimizes revenue collection risks because future changes in occupancy levels have no impact on future revenue collections. Higher revenue yields mean there is a more significant funding stream that can be leveraged to finance the construction of the Project.

   According to GDOT's *Northwest Corridor Managed Lanes Traffic and Revenue Forecasting Report* from June 2010, 50-year accumulated gross revenues for a reversible, HOT3+ scenario, with trucks prohibited from the managed lanes, are projected to be $2.84B in 2008 dollars. An ETL scenario will generate over $3.49B, a 23% increase over the HOT3+ alternative. In spite of these significant projected amounts for 50-year accumulated gross revenue, ongoing infrastructure maintenance expenses and customer service center costs are projected to erode the revenue stream such that net receipts are forecast to be on the order of 85% of these values. In addition, out-year revenues are heavily discounted, such that the bonding capacity of the revenue stream is less than the capital cost of the project, leaving a gap to be covered by other funding sources. The additional revenue and reduced toll collection costs associated with an ETL tolling policy helps to minimize this funding gap.

2. Managed Lane Operations

A toll policy using ETL has advantages associated with ease of use and simplicity of operations because there is no ambiguity concerning free vehicles and those that are required to pay. For this reason, ETL is deemed to be less complex operationally than a HOT3+ policy. Under an ETL toll policy, violation rates are also likely to be lower than violation rates under a HOT3+ policy because there is no ambiguity regarding eligibility and no need for users to initiate status changes on their transponder accounts to reflect the number of vehicle occupants present for each trip. HOT3+ introduces additional complexities regarding enforcement, since occupancy must be monitored. This will lead to higher enforcement costs and subsequent lower net revenues, relative to an ETL policy. In these ways, HOT3+ will likely be a more complex tolling policy for the Project.

3. Accommodate Accessibility

A toll policy using HOT3+ encourages both HOV formation and transit usage since carpools of 3 or more persons and transit vehicles are guaranteed a congestion-free ride at no additional charge. An ETL policy does not provide for non-tolled carpool formation, but it does encourage carpools based on the mobility provided and in sharing of the toll cost among the carpoolers. Additionally, transit users can enjoy the enhanced mobility for no additional cost.

Toll Policy Comparison Summary

This memorandum provides a summary comparison of two potential tolling polices for the I-75 and I-575 Northwest Corridor Project: HOT3+ and ETL. Clearly, there are tradeoffs associated with the decision on which policy to pursue moving forward. Overall, ETL is easier and less costly to operate and enforce, less costly to implement, generates higher revenues, and carries less revenue risk than HOT3+. A HOT3+ policy accommodates a segment of the HOV population, and does more to encourage HOV formation than does ETL, but this policy introduces an increased burden in accurately accounting for these free vehicles and requires additional processing costs for transactions that generate no revenue.

Appendix D State Road and Tollway Authority Cash Pay Structure

STATE ROAD & TOLLWAY AUTHORITY
STATE OF GEORGIA

Nathan Deal, Governor
Chairman

Gena L. Evans, Ph.D.
Executive Director

February 26, 2013

SRTA Cash-Based/Cash-Preferred Customer Solutions Overview

In order to provide choices and flexibility to current as well as potential Peach Pass customers, SRTA is developing several strategies to allow cash-based or cash-preferred customers multiple payment methods so that they can utilize the state's toll facilities. These payment "channels" include in person Customer Service centers and retail based payment options.

SRTA WALK UP CUSTOMER SERVICE CENTERS

SRTA currently operates 3 walk up Customer Service Centers where current as well as new customers can transact business in person with SRTA. These locations support new account sign up, account closings, account payments and violation payments. Each location is set up to process payments made via cash, check or credit card. Customers will have the choice to open pre-paid Peach Pass accounts via credit card or cash. Either payment method is subject to the same charges and fee schedules. In addition, to the payment related transactions identified above, Peach Pass customers can request and receive Peach Pass transponders, as well as update vehicle and account information at these locations.

SRTA's primary Customer Service Center is located at SRTA's headquarters in downtown Atlanta. This location is considered our permanent location and offers all of the services noted above, plus access to SRTA management.

The other two Customer Service Centers are co-located at Georgia Department of Driver Services (DDS) Service Centers along the I-85 corridor. These two locations provide easy access to motorists who live near and/or frequently travel the I-85 Express Lanes. SRTA opened both locations in advance of the opening of the I-85 Express Lanes in order to facilitate account set up and transponder penetration, and general motorist education of the I-85 Express Lanes.

SRTA intends to duplicate this model by partnering with DDS to co-locate Peach Pass Customer Service Centers at other DDS locations located in the vicinity of future planned toll facilities; including both the planned I-75 NWC managed lanes and the planned I-75 South Express Lanes toll facilities. In addition, SRTA's marketing plans include opening additional locations near the physical location of upcoming toll facilities. This allows SRTA to have a presence that is physically convenient to motorists most likely to use the new facility. As part of each project, SRTA will open Customer Service Centers in advance of the respective toll facilities opening to traffic.

The current Customer Service Centers are located at:

- State Road and Tollway Authority, 47 Trinity Ave. SW, Ground Floor, Atlanta, GA 30334
- Department of Driver Services, 2211 Beaver Ruin Road, Norcross, GA 30071
- Department of Driver Services, 310 Hurricane Shoals Road, NE, Lawrenceville, GA 30046

"PAY N GO" PEACH PASS ACCOUNT OPTION

In order to provide additional options for cash-based or cash-preferred customers to access all electronic toll facilities, the State Road and Tollway Authority (SRTA) is working with its back office provider, Electronic Transaction Consultants Corporation (ETCC) and third party network provider, InComm, to provide a cash-based payment solution that is available to all current or potential Peach Pass customers at retail locations that they commonly visit throughout the week.

InComm is an industry leading marketer, distributor and technology innovator of stored-value gift cards and prepaid products. InComm's retail network features most of the premier brands in the big box, grocery, convenience, chain drug, discount, electronics, office supply and other categories. Through an electronic interface, InComm's network will communicate receipt of prepaid toll funds that will be associated with a toll transponder and available for use on any Georgia toll facilities. As currently envisioned, SRTA is working with ETCC and InComm to offer the following 2 products within the next 6 – 12 months. Both products will be marketed under the brand, "Pay N Go Peach Pass" Accounts:

The first is a package containing a Peach Pass transponder and an InComm reloadable card. This package is referred to as a Pay N Go Peach Pass Starter Kit. The card inside the kit will be associated to the transponder in InComm's database. SRTA will be responsible for furnishing the transponder and InComm will produce the card. InComm will package the card and transponder together and provide logistics to get the cards onto the existing gift card displays at merchants in the appropriate areas throughout Metro-Atlanta (or whichever geographic location within Georgia that is in proximity to a state toll facility). The transponder/card package will be sold for a suggested $2.50, plus the pre-paid toll value added to the account at the time of purchase. Currently we contemplate a suggested minimum value of $20, which corresponds with the minimum prepaid amount on credit card based pre-paid accounts and a maximum of $500. The retail merchant and InComm would be compensated through the $2.50 fee.

The entire financial transaction occurs in real time in the same manner as any other point of sale purchase. By the time the consumer exits the store, the value is associated with the transponder. The consumer simply attaches the transponder to their vehicle and they can immediately access the I-85 Express Lanes, the GA 400 Open Road Tolling lanes, as well as any other toll facility (e.g. the planned I-75 Northwest Corridor Express Lanes and the planned 75 South Express lanes). The packaging instructions will include information on how to add value to their account through retail merchants located through the consumer's live/work communities, as well as information on automated online payments via debit or credit cards for reloading. This allows a cash-based customer to access the system very easily and remain anonymous if desired. This puts the transponder distribution and payment process in the communities of all potential users, at the merchants where they shop weekly. This also allows easy transponder distribution to the credit card-based customer by reminding them while they shop.

The second product would be a reload or "top-up" card only. This card would hang next to the Starter Kit package described above, and will be marketed as "good for top-up of existing accounts." After picking up the card and proceeding to the register, the customer is asked, "how much do you

want to add to the card", with a minimum of $20 and maximum of $500. A $1.50 transaction fee will be added to the transaction. The consumer then leaves the store, calls a toll-free number and goes into InComm's Interactive Voice Response (IVR) system. The consumer provides the card number and their transponder number. The IVR platform, is linked to InComm's database which in turn is linked to the merchant's Point of Sale (POS) system will determine the value of the card that was paid at the register and will send ETCC a message with the information. ETCC will then add the value to the appropriate Peach Pass account and respond with the new balance, which will be provided to the consumer via the IVR system. Once the customer has associated the "top-up" card with their account (by linking it to one of the transponders on their account) the balance is immediately available on their account. If the customer has difficulty, a live operator will assist 24/7/365 in English and Spanish. The data capture may also be completed on a web site or via a mobile application. The customer only has to provide the transponder data once. InComm will associate the data with the card, and subsequent "top-up" transactions with the same card will automatically push the value to ETCC from the merchant location's POS system in real-time with no additional data capture needed. Subsequent top-ups will also incur the $1.50 fee.

The products outlined here will leverage the latest payment and replenishment mechanisms that are familiar to those customers who may already use similar process used for phone calling cards and gift cards.

Retail merchant locations such as Wal-Mart, Walgreen's, Target and Best Buy are a few of the retail merchants within InComm's network. We will be working with InComm to identify specific locations at the appropriate time. We believe that the steps outlined here, will allow the same ease of access as provided to those patrons who have credit card-backed accounts. In fact, it should be noted that these products can be used by cash-based or credit card-based customers for the same fee structure. The fees charged are sized to nominally compensate InComm and the retail merchants for their operation and maintenance of the broad distribution network. This ease of access, coupled with the simplicity of the approach, is the cornerstone to providing a convenient solution for payment of tolls by cash-based customers.

CONCLUSION

SRTA's current business model distributes Peach Pass sticker transponders free to all users (credit card and cash-based). The solutions outlined in this paper increase those distribution channels as a convenience to current and potential customers. There is no charge to reload customer accounts if the account is backed by a credit card. There is no charge to reload customer accounts in person at customer service walk-up facilities (operated by SRTA) for the cash user. SRTA is constantly evaluating its business practices (including account establishment and reload) to best serve their customers. The InComm solution with prepaid cards is currently envisioned as a convenient option for the cash-based user. As we develop and market the InComm solution we will continue to refine its terms. The pricing that is currently in place is anticipated to stay at its current levels indefinitely but will be re-evaluated at the time of renewal of the contract.

Appendix E Indirect and Cumulative Impacts Memorandum

NORTHWEST CORRIDOR PROJECT

Indirect and Cumulative Impacts Memorandum

PREPARED FOR:
Federal Highway Administration
and
Georgia Department of Transportation

PREPARED BY:

Parsons Brinckerhoff
May 9, 2013

Project Number CSNHS-0008-00(256)
PI No. 0008256

Table of Contents

Table of Figures

Table of Tables

1.0 INTRODUCTION

This section presents the project background, the purpose of this report, and the project location. A description of the proposed improvements comprising the Northwest Corridor Project also is included.

1.1 Project Background

The Federal Highway Administration (FHWA) and Georgia Department of Transportation (GDOT) propose to improve Interstate 75 (I-75) and I-575 in the Atlanta metropolitan area. The transportation improvements are collectively referred to as the Northwest Corridor Project. Federal approvals, permits, and funding assistance are required to construct the improvements; and accordingly, the proposed project is subject to review under the National Environmental Policy Act of 1969, as amended (NEPA).

1.2 Purpose of this Report

This *Indirect and Cumulative Effects Memorandum* describes the methodology utilized for analyzing the potential indirect and cumulative effects of the proposed project. This methodology was used for the *Supplemental Environmental Impact Statement* (SDEIS), the *Final Environmental Impact Statement* (FEIS) and the 2013 *FEIS Reevaluation*.

1.3 Project Location

The Northwest Corridor Project corridor extends northwest along I-75 from Akers Mill Road to just north of Hickory Grove Road, and along I-575 from the I-75/I-575 interchange north to Sixes Road. The project corridor is northwest of downtown Atlanta, Georgia. The study corridor borders the suburban cities of Smyrna, Marietta, Kennesaw, and several unincorporated communities in Cobb and Cherokee Counties. The area is home to a substantial share of the region's population as well as several business centers, two large regional shopping malls, Dobbins Air Reserve Base, and the offices of numerous major corporations.

The main highway serving the Northwest Corridor is I-75. It is the primary route for commuters traveling to jobs within the region and to downtown Atlanta. As a major north-south route through Georgia, I-75 also serves the transportation needs for regional travel and freight trucking. In downtown Atlanta, I-75 is merged with I-85. North of the I-75/I-85 split in Midtown Atlanta, I-75 turns to the northwest and intersects with the I-285 beltway around Atlanta. Between I-85 and I-285, I-75 is ten lanes, with four general-purpose lanes, and a high-occupancy vehicle (HOV) lane in each direction. North of I-285, I-75 widens to as many as 15 lanes and then narrows again to eight then six lanes north of the I-575 interchange. I-575 travels northeasterly from its interchange with I-75 in Cobb County into Cherokee County. Along the I-575 corridor, there are four general-purpose lanes, two in each direction.

1.4 Proposed Project

The Northwest Corridor Project would make improvements to I-75 and I-575 northwest of Atlanta. The Preferred Alternative would extend the two existing I-75 managed lanes (HOV lanes, one in each direction) that currently terminate at Akers Mill Road south of the I-75/I-285 interchange. Two new managed lanes would extend north to the I-75/I-575 interchange. A single managed lane would continue north on I-75 from the I-75/I-575 interchange to just beyond Hickory Grove Road. Similarly, a single managed lane would continue north on I-575 from the I-75/I-575 interchange to the Sixes Road interchange. The new managed lanes on I-75 and

I-575 would be reversible; meaning the directional flow of traffic in the lanes would change during the day. During the morning peak commute period, the lanes would only accommodate southbound traffic towards Atlanta. During the remainder of the day, the directional flow of the traffic would be reversed to accommodate only northbound traffic towards the suburban communities.

2.0 METHODOLOGY

The indirect and cumulative effects (ICE) discussion for the Northwest Corridor Project (NWCP) *Supplemental Draft Environmental Impact Statement* (SDEIS) and *Final Environmental Impact Statement* (FEIS) was based on the approach used in North Carolina by the North Carolina Department of Transportation (NCDOT), including screening techniques to narrow the focus to relevant resources and impacts.

The NCDOT has had indirect and cumulative effects guidance in place since 2001. The NCDOT procedures are in keeping with the process reflected in the Council on Environmental Quality (CEQ) handbook. In addition, the project team compared the NCDOT guidance with the April 2011 American Association of State Highway and Transportation Officials (AASHTO) Practitioner's Handbook 12: *Assessing Indirect Effects and Cumulative Impacts under NEPA*. This review found the guidance provided by NCDOT to be consistent with the information provided in the Practitioner's Handbook.

The approach for determining the potential indirect and cumulative effects of the NWCP included:

- Establishing the limits of the ICE study area and the reasons behind it.
- Briefly describing the characteristics or notable features of the study area as defined elsewhere in the EIS. Based on the analysis that was conducted for land use and the technical studies (i.e. history, ecology, environmental justice, etc.) it was determined that no highly unique or highly sensitive resources that would require special attention were present.
- Identifying past, present and reasonably foreseeable future actions. These were based on census data; population and growth trends including past, present and future land uses based on data from comprehensive plans; records of planned residential, commercial and industrial development; and planned transportation projects. This information was included in the land use sections of both the SDEIS and FEIS, chapters 3 and 5.
- Identifying resources which the project did not directly impact. If the project had no direct impact on a particular resource, then it could not contribute to a cumulative impact on that resource. In this case, no cumulative impact assessment related to that resource was conducted.
- Assessed the cumulative effects for the resources not exempted by the process listed in the above bullet.

2.1 Indirect and Cumulative Effects - SDEIS

The study area for the assessment of indirect and cumulative effects for the project is linear, and consisted of the existing highway, additional project right-of-way, adjoining neighborhoods, and

connected ecosystems. The study area began at Akers Mill Road, just south of the I-285/I-75 interchange and extended northward to the intersection of I-75 and I-575, where it splits. It continued on I-75 to the north terminus at Hickory Grove Road and followed I-575 to the second terminus at Sixes Road.

The above area was considered to be the project limit of influence for cumulative effects based on the following:

- The project is not expected to induce changes to existing or planned land use (see SDEIS Section 5.2).
- Additional right-of-way requirements are limited. As described in Section 2.4.2.1, the project would require approximately 150 feet of additional right-of-way between South Marietta Parkway and Roswell Road and a maximum of 85 feet for the remainder of the alignment. No additional right-of-way would be required for either I-75 or I-575 north of the I-75/I-575 interchange.
- The area described captures the full area of neighborhoods and natural resources that could be directly or indirectly affected by the project as well as by other past, present, and reasonably foreseeable future actions and result in a cumulative impact on those neighborhoods or natural resources.

2.1.1 Indirect Effects

The potential for the project to result in indirect effects was evaluated relative to Chapters 4 and 5 in the SDEIS (Traffic and Environmental Consequences).

Indirect effects could occur in the event project implementation resulted in one or both of the following:

- Development or redevelopment that is not currently planned for the study area
- Traffic shifts on the existing surface street system

The land use analysis presented in the SDEIS, Section 5.2 concluded that the project would not induce or shift patterns or intensity of existing or planned local or regional development or redevelopment. The area of the project is largely developed and a pattern and intensity has been well established. The project may cause some replacement development, potentially at the new managed lane interchanges; however both existing zoning and comprehensive planning will limit the scale and intensity to be similar to the existing development. Therefore, it was concluded that the project would not affect land use, as it would be consistent with local and regional land use plans. The project also would not affect existing or projected population, as the study area population is anticipated to increase 37 percent from 746,788 to 1,026,162 between 2010 and 2035 (see Table 3-2).

The project also would not result in substantial shifts of traffic within the existing surface street system, such that increases in traffic would be noticeable and/or require new traffic control measures. The nature of the project is focused largely on trip reliability and only secondarily on capacity improvements. Volume shifts are anticipated to be small on the adjacent surface street system. The project was projected to result in a 1 to 3 percent decrease in average daily traffic (ADT) on primary arterials that parallel I-75 and I-575.

No development or redevelopment or substantial shifts in traffic on the existing surface street system were anticipated to be induced in the study area by the project. The proposed project

was not anticipated to result in indirect impacts to community, cultural resources, natural resources, or other physical features in the ICI study area.

2.1.2 Cumulative Effects

Actions Considered

Within the ICI study area, past actions included those that resulted in a change from agricultural and woodland uses to urban features that included:

- Existing freeway and roadway system
- Residential areas
- Industrial facilities
- Commercial areas.

Present actions included:

- Proposed project
- Current development and redevelopment and associated infrastructure.

Reasonably foreseeable future actions included:

- Additional planned transportation improvements
- Future planned development and redevelopment and associated infrastructure as discussed in the SDEIS, Section 3.1.

Additional planned transportation improvements in the ICI study area are shown in Table 1. Those listed as included in the No-Build Alternative were considered reasonably foreseeable. These included projects listed as long range (RTP), as well as those shown as programmed for implementation(TIP). The reasonably foreseeable projects could contribute to cumulative effects to the extent their implementation would affect the same neighborhoods or natural resources as the proposed project.

Potential development and redevelopment activities described in the City *of Marietta Comprehensive Plan 2006-2030* would occur in the vicinity of the project and other transportation improvements in the study area. Therefore, the potential cumulative effects of these activities also were addressed.

Effects Considered

Based on the methodology outlined in Section 2.0, potential cumulative effects of the project were evaluated for acquisitions and displacements; land use; economic resources; environmental justice; visual quality and aesthetics; noise; and water quality.

Acquisitions and Displacements

The SDEIS identified the potential for the displacement of six residential properties and six business properties (11 businesses) by the Preferred Alternative. The relocations would occur within the jurisdictional boundaries of the City of Marietta. The City's comprehensive plan, *City of Marietta Comprehensive Plan 206-2030*, outlined the city's overall policy to foster growth and development. The plan stated that high-density to moderate density-residential uses should be added in areas of transit-oriented development. At the time of the SDEIS, no specific programmed redevelopment projects for transit or other facilities were identified. The

Table 1 Planned Highway Improvements Evaluated in ICI Study Area

Project	Roadway Segment	Total Project Miles	Miles in ICI Study Area
Northwest Corridor (I-75 and I 575 Managed Lanes	Akers Mill Road to Town Center Area on I-75; and I-75 to SR-20 on I-575	20.0	20.0
I-575 Widening (+2 lanes)	I-75 North to SR-5 Business in Cherokee County	20.1	20.1
I-285 North Managed Lanes (+4 lanes)	I-75 North in Cobb County to I-85 North in DeKalb County	13.2	2.3
I-285 West Managed Lanes (+4 lanes)	I-20 West in City of Atlanta to I-75 North in Cobb County	9.6	1.3
Shiloh Road/Shallowford Road (+2 lanes)	From Cherokee Street/Wade Green Road to Canton Road	4.8	4.0
Bells Ferry Road Widening (+2 lanes) – 3 projects	Southfork Way to North of Sixes Road	5.2	3.0
I-575 at Ridgewalk Parkway	New Interchange	N/A	N/A
US 41 Cobb Parkway Widening (+4 lanes) and Grade Separation at Windy Hill Road – 5 projects	Windy Ridge Parkway to SR 120 (North Marietta Parkway)	5.9	5.9
Big Shanty Road Widening (+2 lanes)	Busbee Parkway to Chastain Meadows Parkway	0.7	0.7
	Chastain Meadows Parkway to Bells Ferry Road	0.4	0.4
Big Shanty Road Extension (4 lanes) – 2 projects	Busbee Parkway to Chastain Road	0.9	0.9
I-75 Improvements	I-285 North to Delk Road	N/A	N/A
South Barrett Parkway Reliever – Greers Chapel Road Widening (+2 lanes)	US 41 (North Cobb Parkway) to Shiloh Valley Drive	1.0	1.0
South Barrett Parkway Reliever – New Alignment (4 lanes)	Greers Chapel Road South of Intersection with Barrett Parkway to Bells Ferry Road	1.6	1.6
Sixes Road Bridge Widening (+2 lanes)	At I-575	N/A	N/A
Sixes Road Widening (+2 lanes)	I-575 to Old SR 5 (Holly Springs Parkway)	0.3	0.3
Leland Drive Extension (+2 lanes widening; 4 lanes new)	Windy Hill Road to Terrell Mill Road	0.8	0.8
Windy Hill Road Westbound Widening (+1 lane)	East of Powers Ferry Road to Spectrum Circle	0.2	0.2
Powers Ferry Road Northbound Widening (+1 lane)	Wildwood Parkway to Terrell Mill Road	0.3	0.3
Jiles Road (+2 lanes)	Cherokee Street/Wade Green Road to US 41 (North Cobb Parkway)	3.3	3.3

Source: ARC 2007

comprehensive plan also showed residential areas as remaining residential. One potential highway widening project was identified that had the potential to affect neighborhoods and businesses. The project, identified as a 5.9-mile widening and grade separation of US-41 (Cobb Parkway) between Windy Ridge Parkway and SR 12 (North Marietta Parkway), was identified as having the potential for displacements. The widening would occur exclusively within a business area. Based on visual observation, indications were that the businesses had sufficient setback and, while the widening could affect some business-related parking, no apparent displacements would occur. As a result, it was determined that, other than the six residences and six business properties affected by the Preferred Alternative, it was likely that other residences and businesses would remain. Based on the above, a relatively small number of acquisitions and displacements would be associated with the proposed project, City of Marietta land use plans, and the Cobb Parkway widening project. The contribution of the proposed project to cumulative effects of the identified transportation, development and redevelopment projects that might occur in the future was anticipated to be negligible.

Environmental Justice

The SDEIS identified the potential displacement of six residences and 11 businesses the Preferred Alternative. All of the affected residences and businesses were located in identified minority and low-income neighborhoods. The residential displacements were scattered over three different neighborhoods, while the businesses were concentrated in a single location. Because of the relatively small number of residential displacements and the minimal effect on the neighborhoods, the project contribution to the cumulative effect of displacements, when combined with other development-related displacements of minority and low-income persons was expected to be neglible.

Visual Quality and Aesthetics

As addressed in Section 5.8 of the SDEIS, the project was determined not affect visual character of visually sensitive resources. It was anticipated to result in a moderate impact to visual quality. In the context of visual effects, cumulative impacts would occur with implementation of multiple projects in the same viewshed. Because of the existing urban and developing environment along the I-75 and I-575 corridors and the scattered nature of the potential transportation and development/redevelopment projects which would affect a range of discrete views and visual settings, cumulative visual impacts were not anticipated.

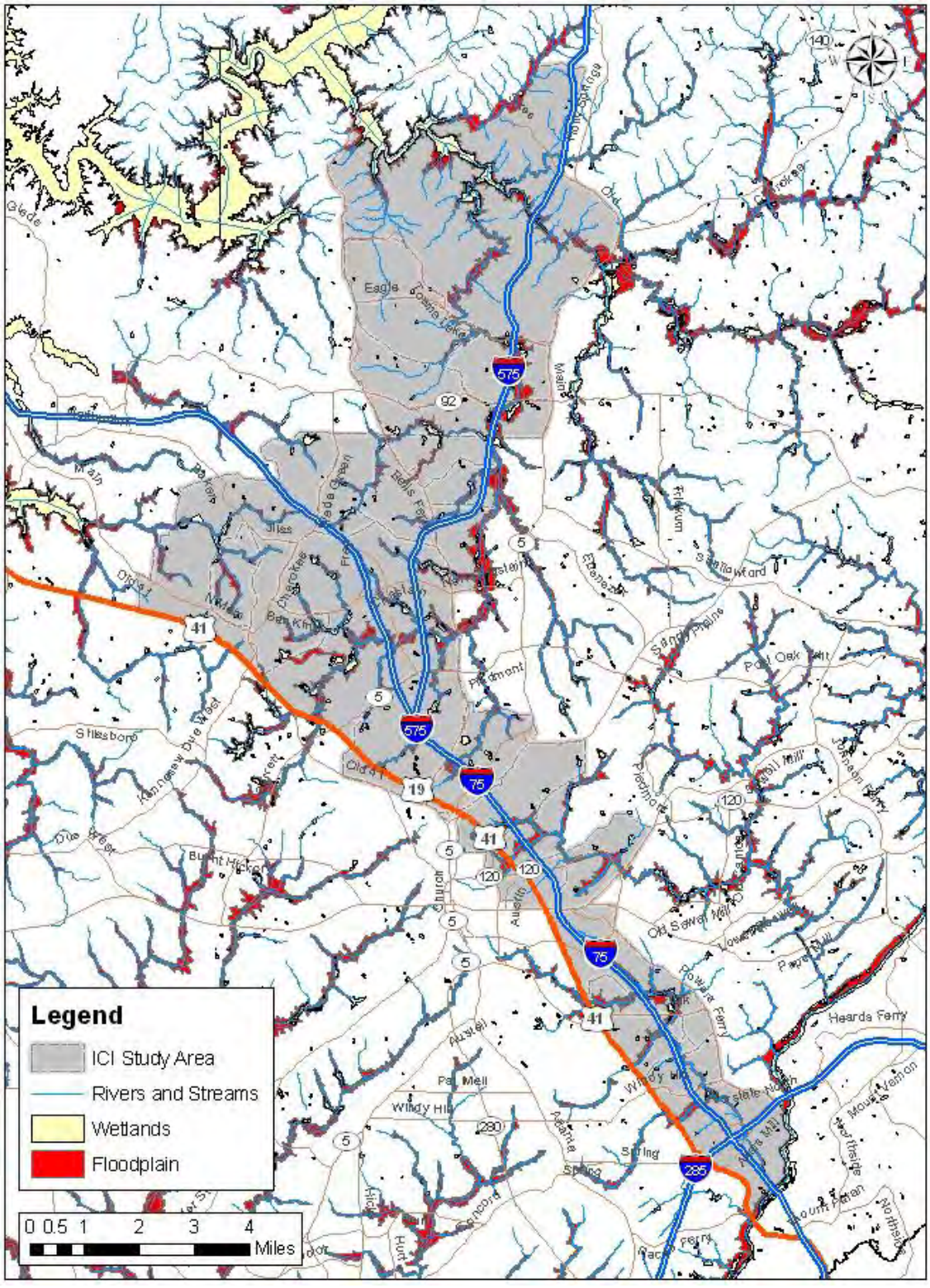
Noise

The future year analysis includes projected traffic volumes and speeds for the project, forecasted background traffic growth, traffic growth resulting from other planned and programmed projects for the area and improvements in speed resulting from capacity improvements. As a result, the noise impacts predicted in the noise analysis and presented in the SDEIS represent direct, indirect and cumulative noise impacts in areas where the project could influence traffic.

Water Quality

The Preferred Alternative would require an additional 85 to 150 feet of right-of-way along the approximately 10-mile segment between Akers Mill Road and the I-75/I-575 interchange. In the SDEIS, the following impacts to water resources were identified: 17 acres of floodplain fill; 3,025 linear feet of surface water; and 0.3 acre of wetland. The surface water and wetland impacts would be mitigated by withdrawals of mitigation credits from existing USACE-approved or GDOT-owned stream and wetland mitigation banks.

Figure 1 ICI Boundary-Surface Water



Source: Northwest Corridor Project Supplemental Draft Environmental Impact Statement 2010 and Northwest Corridor Project Final Environmental Impact Statement 2011.

For floodplains, streams and wetlands, the 44,022-acre study area was evaluated for potential cumulative effects on these resources. Figure 1 shows the ICI study boundary for these resources.

Planned highway improvements in the ICI area are listed in Table 1. The potential impacts of these projects to floodplains, streams and wetlands were calculated assuming a 500-foot radius from the center of interchanges and intersections. The resulting potential impacts are discussed below. The estimates are conservative, as the width/radius of many of the improvements includes existing roadways where development has already occurred and the specific characteristics of these projects is not known but are unlikely to affect the full width of such a corridor.

The ICI study area has an extensive network of streams and associated floodplains. Within the ICI study area, floodplains comprise approximately 4,816 acres. The existing project right-of-way includes about 138 acres of floodplain; the proposed project right-of-way includes less than 10 acres of additional floodplains since the majority of the project is located within existing right-of-way. The corridors for other planned highway improvements include approximately 142 acres of floodplains based on the corridor width assumptions described above. As shown in Figure 1 , the project corridor has 13 floodplain crossings with associated streams. Other planned highway projects would have about eight floodplain crossings with associated streams.

The project corridor is highly urbanized, with commercial, industrial, and residential development, and the surrounding study area is becoming increasingly urban. Therefore, as noted above, the area along the project corridor is mostly developed and, in some cases, older development may be within 100-year floodplains and already taken into account in floodplain mapping. Current and future development/redevelopment and associated infrastructure would occur within the parameters of existing local ordinances that govern development in floodplains. These ordinances avoid or minimize encroachments into floodplains and restrict land use that is incompatible with the natural function of floodplains.

The future highway projects shown on Table 1 are governed by Executive Order 11988, Floodplain Management; USDOT Order 5650.2, Floodplain Management and Protection; and Title 23, Section 650 of the Code of Federal Regulations. Floodplain impacts and significant encroachments are not permitted unless there is no practicable alternative.

Although, as described above, there is a potential for reasonably foreseeable future transportation and development projects to affect floodplains, they would be required to comply with the ordinances and regulations that restrict development in floodplains and affects on flood elevations. Therefore no significant cumulative impact to floodplains is expected.

As shown on Figure 1, wetlands are scattered throughout the ICI study area. Most are within floodplains and/or associated with navigable waters and, therefore are within USACE jurisdiction under the Clean Water Act, with additional protection provided by the floodplain ordinances and regulations described above. Two substantial wetland systems occur at the southerly and northwest boundaries of the ICI study area.

Overall, jurisdictional and non-jurisdictional wetlands comprise approximately 1,312 acres of the ICI study area. An estimated 1,021 acres of these wetlands are within floodplains. A few wetlands may have been part of a larger system in the past. However, the pattern shown on Figure 1 is characteristic of their location within Georgia's piedmont region, where wetlands tend to be relatively small and found along adjacent to streams.

The wetlands within floodplains are unlikely to be affected by ongoing or future development projects, as they would be protected by floodplain development restrictions. Future development/redevelopment projects may have the potential to affect jurisdictional and non-jurisdictional wetlands that are outside of floodplains. However, these future projects will be required to be in compliance with Sections 404 of the CWA, as amended, which require a permit placement of fill in wetlands.

The proposed project is expected to affect 0.3-acre of jurisdictional wetland. Within the ICI study area, 35 acres of wetlands are within planned highway improvement corridors using the conservative assumptions described above. It can be expected that efforts will be made to avoid, minimize, and mitigate wetland impacts in developing these projects as per Sections 404 of the CWA, as amended and Executive Order 11990, which requires federal agencies to avoid use or modification of wetlands unless there is no practicable alternative.

Cumulative impacts to wetlands within floodplains are not anticipated, both because no notable wetland systems would be affected by a combination of projects that would substantially deteriorate their function and small wetland impacts would be avoided, minimized, or mitigated by federal law and regulation.

Streams in the ICI study area are shown on Figure 1 . As shown on Figure 1, approximately 119 miles of jurisdictional streams are within the ICI study area and are subject to regulation by the USACE in accordance with requirements of the CWA. The project corridor has 19 stream crossings. No new crossings are required by the project. Based on available data, approximately four miles of streams are within the corridors of future projects using the corridor width assumptions described above, which would include about nine stream crossings. New development/ redevelopment and future transportation projects affecting streams would be required to implement stream protection measures in accordance with requirements of the Georgia Erosion and Sedimentation Act of 1975, as amended and implemented by the GDNR, Environmental Protection Division. These measures include provision of a 25-foot vegetative buffer for warm-water non-trout streams and a 50-foot vegetative buffer for cold water trout streams. Encroachments to these buffers generally require a stream buffer variance that includes requirements for erosion control measures.

Other requirements for land-disturbing activities that may result in soil erosion and sedimentation include best management practices such as minimizing cut and fill, timely vegetation and revegetation, trapping runoff by use of debris basins, sediment basins, silt traps or similar measures. Also, permits require submittal of erosion and sedimentation control plans. Therefore, although streams could be affected by reasonably foreseeable future actions, based on protection requirements, cumulative impacts to streams and related effects to water quality are not anticipated.

2.2 Indirect and Cumulative Effects - FEIS

The study area for the assessment of cumulative effects for the project is linear, and consisted of the existing highway, additional project right-of-way, adjoining neighborhoods, and connected ecosystems. The study area began at Akers Mill Road, just south of the I-285/I-75 interchange and extended northward to the intersection of I-75 and I-575, where it splits. It continued on I-75 to the north terminus at Hickory Grove Road and followed I-575 to the second terminus at Sixes Road.

The above area was considered to be the project limit of influence for cumulative effects based on the following:

- The project is not expected to induce changes to existing or planned land use (see FEIS, Section 5.2).
- Additional right-of-way requirements are limited. As shown in Table 2-8, except for one segment, no more than 110 feet of right-of-way would generally be anticipated for the new reversible lane system, including the new managed-lane interchanges and slip ramps. However, up to about 150 feet of additional right-of-way would be required between South Marietta Parkway and SR 3 Conn/Roswell Road. Additional right-of-way would be required for the relocation of Frey's Gin Road at its intersection with SR 3 Conn/Roswell Road. No additional right-of-way would be required along I-75 between the I-75/I-575 interchange and Hickory Grove Road.
- The area described captures the full area of neighborhoods and natural resources that could be directly or indirectly affected by the project as well as by other past, present, and reasonably foreseeable future actions and result in a cumulative impact on those neighborhoods or natural resources.

2.2.1 Indirect Effects

Indirect effects could occur in the event project implementation resulted in one or both of the following:

- Development or redevelopment that is not currently planned for the study area.
- Traffic shifts on the existing surface street system.

Existing and Future Land Use Trends and Induced Development

According to long-term population projections (see FEIS, Table 3-3) and employment forecasts (see FEIS, Table 3-10), the region is predicted to continue to maintain its long term growth pattern, despite the recession, regardless of whether or not the Preferred Alternative is selected and implemented.

Each local government in Georgia is required to prepare and implement a comprehensive plan consistent with Georgia Planning Act of 1989. The ARC, Cobb and Cherokee Counties, and the cities of Marietta, Smyrna, Acworth, Kennesaw, and Woodstock are responsible for developing land use plans, policies and strategies within the study area. The policies provide the basis for zoning, growth management and land use restrictions. The current regional plan and local comprehensive plans and their accompanying future land use maps portray a continued focus on higher density development capable of serving regional markets and trade areas and areas that provide the retail and service needs of several neighborhoods and communities, encouraging low to medium intensity office, retail and commercial service. They also focus residential development away from the areas immediately adjacent to I-75 and in areas along I-575 northeast of the I-75/I-575 interchange. These plans and policies were developed with public and local agency input and represent the communities' vision for the future. These plans and policies project continued long-term population and employment growth regardless of whether or not the Preferred Alternative is selected and implemented.

The Preferred Alternative was developed as a way to manage congestion and provide trip reliability created by the already established land use patterns in the region. The land use plans and future land use maps for the area paint a vision of continued growth with a focus on higher

density development along the I-75 corridor and residential development beyond that and along I-575. Given the current and projected residential and employment trends and the future land use plans for the area, the Preferred Alternative is not likely alter development trends in the area or induce development that is not already planned for development would be planned according to the local jurisdictions.

Traffic Shifts

The project would not result in substantial shifts of traffic within the existing surface street system such that increases in traffic would be noticeable and/or require new traffic control measures. The project is projected to result in a 1 to 3 percent decrease in average daily traffic (ADT) on primary arterials that parallel I-75 and I-575 (*Traffic Technical Report*, Parsons Brinckerhoff, 2011).

These traffic shifts are the result of the complex and interrelated factors caused by the limited new capacity in the I-75 and I-575 corridors. The construction of the managed lanes adds some additional capacity to the project area as a whole, and to I-75 and I-575 in particular. This added capacity would be expected to cause a shift in traffic from parallel facilities such as US-41/Cobb Parkway. This is logical due to overall improvements in travel time on I-75 and I-575 in both the managed and general purpose lanes. The shift, however, would not be expected to be one-to-one. Rather, less traffic would shift from the parallel primary arterials than is forecast in the managed lanes. This would cause a reduction in travel times for the general-purpose lanes under the Preferred Alternative in comparison to the No-Build Alternative.

In the traffic analysis, some minor changes in traffic patterns were noted with the construction of the four new managed lane/local access interchanges on I-75. The new interchanges would add traffic to the cross streets at Terrell Mill Road, SR 3 Conn/Roswell Road, Big Shanty Road, and Hickory Grove Road. However the peak hour volumes are relatively small due to the single- or two-lane capacity of the managed lanes and the distribution of this traffic across 4 new interchanges. These volume increases were not substantial enough to require any overall improvements to the roadways beyond the immediate interchange ramps. Some minor volume changes were noted at the existing and planned managed lane interchange locations on I-75 due to redistribution to the new managed lane interchanges. None of these changes necessitated any changes in the existing roadway configurations.

A modal shift of trips to transit vehicles was also noted in the analysis. This shift reduced the overall traffic volume in the corridor under the Preferred Alternative, while the number of trips remained constant. In addition, more trips were made in higher capacity transit vehicles.

No development or redevelopment or substantial shifts in traffic on the existing surface street system are expected to be induced in the study area by the project.

2.2.2 Cumulative Effects

Actions Considered

Within the ICI study area, past actions include those that have resulted in a change from agricultural and woodland uses to urban features that include:

- Existing freeway and roadway system;
- Residential areas;
- Industrial facilities; and

- Commercial areas.

Present actions include:

- Proposed project; and
- Current development and redevelopment and associated infrastructure.

Reasonably foreseeable future actions include:

- Additional planned transportation improvements; and
- Future planned development and redevelopment and associated infrastructure as discussed in the FEIS, Section 3.1.2.

Additional planned transportation improvements in the study area are shown in Table 2. These include projects listed as long range, as well as those shown as programmed for implementation (Transportation Improvement Plan). The reasonably foreseeable projects could contribute to cumulative effects to the extent their implementation would affect the same neighborhoods or natural resources as the proposed project.

The *Atlanta Regional Managed Lane System Plan* (GDOT, 2010a) identifies a regional system of interconnected managed lanes throughout the Atlanta area. The regional system of managed lanes is of limited capacity, providing one or two travel lanes, sometimes in a reversible lane configuration and sometimes as bi-directional facilities. The facilities are all to be dynamically tolled, providing the opportunity to operationally manage usage by varying the toll rate. This enables the lanes to achieve a consistent travel time in comparison to the adjacent general-purpose lanes and a revenue stream to assist in paying for construction.

The construction of the lanes provide some limited congestion relief benefit, however by design and operation they are intended to be free flow facilities with few lanes. They do not, nor are they intended to, resolve or even substantially improve congestion in the general-purpose lanes. Since they are limited capacity facilities and are tolled, the implementation of the regional plan is unlikely to impact growth and development in the Northwest Corridor either indirectly or cumulatively.

In December 2010, Cobb County was awarded $1.3 million from the Federal Transit Administration through the Alternatives Analysis Grant Program to conduct an Alternatives Analysis for a potential transit project along US 41/I-75 from the MARTA Arts Center Station in Atlanta to Acworth. This route is directly parallel and close to the alignment of the Preferred Alternative. As this evaluation had not yet begun at the time of the FEIS, it was not considered.

Potential development and redevelopment activities described in the *City of Marietta Comprehensive Plan 2006-2030, The Roadmap to Marietta's Future* (Marietta, 2006) would occur in the vicinity of the project and other transportation improvements in the study area.

Effects Considered

Based on the methodology outlined in Section 2.0, potential cumulative effects of the project were evaluated for acquisitions and displacements; land use; economic resources; environmental justice; visual quality and aesthetics; air quality; noise; and water quality.

Table 2 Planned Highway Capacity Improvements in the ICI Study Area

Project	Roadway Segment	Length (miles)	Status	Included in No-Build?
Northwest Corridor (I-75 and I-575) Managed Lanes	Akers Mill Rd to Town Center Area on I-75 and I-75 to SR 20 on I-575	20.0	Programmed	No
I-575 Widening (+2 lanes)	I-75 North to SR 5 Business in Cherokee County	20.1	Long Range	Yes
I-285 North Managed Lanes (+4 lanes)	I-75 North in Cobb County to I-85 North in DeKalb County	13.2	Programmed	No
I-285 West Managed Lanes (+4 lanes)	I-20 West in Atlanta to I-75 North in Cobb County	9.6	Long Range	No
Shiloh Rd/Shallowford Rd (+2 lanes)	From Cherokee St/Wade Green Rd to Canton Rd	4.8	Programmed	Yes
Bells Ferry Rd Widening (+2 lanes) – 3 projects	Southfork Way to North of Sixes Rd	5.2	Programmed	Yes
I-575 at Ridgewalk Pkwy	New Interchange	N/A	Programmed	Yes
US 41 Cobb Pkwy Widening (+4 lanes) and Grade Separation at Windy Hill Rd – 5 projects	Windy Ridge Pkwy to SR 120 (North Marietta Pkwy)	5.9	Long Range	Yes
Big Shanty Rd Widening (+2 lanes)	Busbee Pkwy to Chastain Meadows Pkwy	0.7	Programmed	Yes
	Chastain Meadows Pkwy to Bells Ferry Rd	0.4	Long Range	Yes
Big Shanty Rd Extension (4 lanes) – 2 projects	Busbee Pkwy to Chastain Rd	0.9	Programmed	Yes
I-75 Improvements	I-285 North to Delk Rd	N/A	Programmed	Yes
South Barrett Pkwy Reliever – Greers Chapel Rd Widening (+2 lanes)	US 41 (North Cobb Pkwy) to Shiloh Valley Dr	1.0	Programmed	Yes
South Barrett Pkwy Reliever – New Alignment (4 lanes)	Greers Chapel Rd South of Intersection with Barrett Pkwy to Bells Ferry Rd	1.6	Long Range	Yes
Sixes Rd Bridge Widening (+2 lanes)	At I-575	N/A	Programmed	Yes
Sixes Rd Widening (+2 lanes)	I-575 to Old SR 5 (Holly Springs Pkwy)	0.3	Programmed	Yes
Leland Dr Extension (+2 lanes widening, 4 lanes new)	Windy Hill Rd to Terrell Mill Rd	0.8	Programmed	Yes
Windy Hill Rd Westbound Widening (+1 lane)	East of Powers Ferry Rd to Spectrum Cir	0.2	Programmed	Yes
Powers Ferry Rd Northbound Widening (+1 lane)	Wildwood Pkwy to Terrell Mill Rd	0.3	Programmed	Yes
Jiles Rd (+2 lanes)	Cherokee St/Wade Green Rd to US 41 (North Cobb Pkwy)	3.3	Programmed	Yes

Note: The length of Project 1 was not correctly reflected in the *Envision6* TIP through Amendment 7. The correct project length is 29.7 miles.

N/A = Not Applicable.

Source: ARC, 2009d.

Acquisitions and Displacements

The FEIS identified the potential for the displacement of six residential properties and seven business properties (12 businesses) by the Preferred Alternative. The relocations would occur within the jurisdictional boundaries of the City of Marietta. The City's comprehensive plan, *City of Marietta Comprehensive Plan 206-2030*, outlined the city's overall policy to foster growth and development. The plan stated that high-density to moderate density-residential uses should be added in areas of transit-oriented development. At the time of the FEIS, no specific programmed redevelopment projects for transit or other facilities were identified. The comprehensive plan also showed residential areas as remaining residential. One potential highway widening project was identified that had the potential to affect neighborhoods and businesses. The project, identified as a 5.9-mile widening and grade separation of US 41 (Cobb Parkway) between Windy Ridge Parkway and SR 12 (North Marietta Parkway), was identified as having the potential for displacements. The widening would occur exclusively within a business area. Based on visual observation, indications were that the businesses had sufficient setback and, while the widening could affect some business-related parking, no apparent displacements would occur. As a result, it was determined that, other than the six residences and six business properties affected by the Preferred Alternative, it was likely that other residences and businesses would remain. Based on the above, a relatively small number of acquisitions and displacements would be associated with the proposed project, City of Marietta land use plans, and the Cobb Parkway widening project. The contribution of the proposed project to cumulative effects of the identified transportation, development and redevelopment projects that might occur in the future was anticipated to be negligible.

Land Use

Cumulative impacts on land use could vary substantially depending on land use and growth policies and strategies put in place by the Atlanta Regional Commission (ARC), Cobb County and the City of Marietta and other agencies and local governments responsible for land use planning and policies. If the current policies are followed, most new residential development would be focused in areas away from regional and community centers and most nonresidential development would be focused along major arterials, highway interchanges, and high-capacity mass transit routes and collectors. If the land use policies are not followed and enforced through zoning and other means, then residential and commercial development could spread outside areas targeted for growth. This is true regardless of whether the No-Build or Preferred Alternative is selected and implemented.

Economic Resources

As with land use, cumulative impacts on economic resources could vary substantially depending on whether growth policies and strategies are followed. If growth occurs outside the areas targeted for growth, the local jurisdictions could experience increased costs to provide and maintain services.

The Preferred Alternative, in combination with other planned improvements could enhance investment, productivity and economic activity in the Northwest Corridor. For example, in 2035 it is estimated that without implementation of the Preferred Alternative, 300,000 households would be within a 45-minute drive of the Cumberland activity/employment center in the afternoon peak period. With the managed lanes, this number would grow to 700,000, a 130 percent increase in total households with access to this vital employment center (HNTB, 2011).

Environmental Justice

The FEIS identified the potential displacement of six residences and 12 businesses the Preferred Alternative. All of the affected residences and businesses were located in identified minority and low-income neighborhoods. The residential displacements were scattered over three different neighborhoods, while the businesses were concentrated in a single location. Because of the relatively small number of residential displacements and the minimal effect on the neighborhoods, the project contribution to the cumulative effect of displacements, when combined with other development-related displacements of minority and low-income persons was expected to be neglible.

An evaluation of the social equity effects of the *Atlanta Regional Managed Lane System Plan* was completed in January 2010 (HNTB, 2010). The study concluded that environmental justice communities are not disproportionately impacted by managed lanes and that the congestion reduction resulted in the potential for air quality benefits.

An earlier study, *HOT Lane Environmental Justice Analysis* (SRTA, 2006) that looked at the effects of tolling on environmental justice populations found that while regional implementation of HOT lanes did not appear to disproportionately impact any particular group when it did not include converting existing HOV or SOV lanes to HOT operation, implementation of HOT lanes would create localized environmental justice concerns.

In summary, while the cumulative effect of the Atlanta Regional Managed Lane System on environmental justice populations in the study area is not anticipated to be disproportionate, some areas of concern do exist. Key methods of addressing these concerns include an educational campaign, inclusive payment methods (e.g. a cash payment option) and access to information regarding the operations and benefits of managed lanes.

Visual Quality and Aesthetics

As addressed in Section 5.8 of the FEIS, the Preferred Alternative would not affect visual character or visually sensitive resources. It would, however, result in a moderate effect on visual quality, as vertical structures associated with the managed lanes would be visible from some locations. Also, where the freeway is at- or above-grade, it would be seen from adjacent properties. Mitigation would include context–sensitive finishes for walls and to enhance areas where the project can be seen from adjacent properties and roadways.

In the context of visual effects, cumulative impacts would occur with implementation of multiple projects in the same viewshed. Because of the existing urban and developing environment along the I-75 and I-575 corridors and scattered nature of the potential transportation and development/redevelopment projects, which would affect a range of discrete views and visual settings, cumulative visual impacts were not anticipated.

Air Quality

The cumulative effect of the past, present and reasonably foreseeable actions within the study area are not expected to adversely affect air quality in the region. The proposed project is included in the ARC's recently adopted *PLAN 2040* RTP (ARC 2011b). A conformity determination conducted for this RTP was updated for the FY 2012-2017 TIP (ARC, 2011c) and the Volume II: *PLAN 2040 Conformity Determination Report* (ARC, 2011d).

The results of the eight-hour ozone emissions analysis conducted for the *PLAN 2040* RTP and the FY 2012-2017 TIP demonstrated adherence to the 20-county motor vehicle emission

budgets established in the Atlanta Early Progress State Implementation Plan (73 FR 9206). As such, *PLAN 2040* RTP and the FY 2012-2017 TIP have demonstrated conformity to the eight-hour ozone standard.

The results of the $PM_{2.5}$ emissions analysis conducted for the *PLAN 2040* RTP and the FY 2012-2017 TIP demonstrated adherence to the level of emissions necessary to meet the No Greater Than Base Year Test. As such, the *PLAN 2040* RTP and FY 2012-2017 TIP have demonstrated conformity to the annual $PM_{2.5}$ standard.

Based on the technical analysis conducted by ARC, it has been determined that the *PLAN 2040* RTP and the FY 2012-2017 TIP demonstrate compliance with the Clean Air Act, as amended in 1990, in accordance with all conformity requirements detailed in 40 CFR Parts 51 and 93 and 23 CFR Part 45. As the proposed project is part of both the *PLAN 2040* RTP and the FY 2012-2017 TIP, cumulative impacts are not expect to adversely affect the air quality in the region.

Noise

For noise, the future year analysis includes projected traffic volumes and speeds for the project, forecasted background traffic growth, traffic growth resulting from other planned and programmed projects for the area and improvements in speed resulting from capacity improvements. As a result, the noise impacts predicted in the noise analysis and presented in the SDEIS and FEIS represent direct, indirect and cumulative noise impacts in areas where the project could influence traffic.

Water Quality

The Preferred Alternative would require an additional 85 to 150 feet of right-of-way along the approximately 10-mile segment between Akers Mill Road and the I-75/I-575 interchange. In the FEIS, the following impacts to water resources were identified: 17 acres of floodplain fill; 3,025 linear feet of surface water; and 0.3 acre of wetland. The surface water and wetland impacts would be mitigated by withdrawals of mitigation credits from existing USACE-approved or GDOT-owned stream and wetland mitigation banks.

For floodplains, streams and wetlands, the 44,022-acre study area was evaluated for potential cumulative effects on these resources. Figure 1 shows the ICI study boundary for these resources.

Planned highway improvements in the ICI area are listed in Table 2. The potential impacts of these projects to floodplains, streams and wetlands were calculated assuming a 500-foot radius from the center of interchanges and intersections. The resulting potential impacts are discussed below. The estimates are conservative, as the width/radius of many of the improvements includes existing roadways where development has already occurred and the specific characteristics of these projects is not known but are unlikely to affect the full width of such a corridor.

The ICI study area has an extensive network of streams and associated floodplains. Within the ICI study area, floodplains comprise approximately 4,816 acres. The existing project right-of-way includes about 138 acres of floodplain; the proposed project right-of-way includes less than 10 acres of additional floodplains since the majority of the project is located within existing right-of-way. The corridors for other planned highway improvements include approximately 142 acres of floodplains based on the corridor width assumptions described above. As shown in Figure 1, the

project corridor has 13 floodplain crossings with associated streams. Other planned highway projects would have about eight floodplain crossings with associated streams.

The project corridor is highly urbanized, with commercial, industrial, and residential development, and the surrounding study area is becoming increasingly urban. Therefore, as noted above, the area along the project corridor is mostly developed and, in some cases, older development may be within 100-year floodplains and already taken into account in floodplain mapping. Current and future development/redevelopment and associated infrastructure would occur within the parameters of existing local ordinances that govern development in floodplains. These ordinances avoid or minimize encroachments into floodplains and restrict land use that is incompatible with the natural function of floodplains.

The future highway projects shown on Table 1 are governed by Executive Order 11988, Floodplain Management; USDOT Order 5650.2, Floodplain Management and Protection; and Title 23, Section 650 of the Code of Federal Regulations. Floodplain impacts and significant encroachments are not permitted unless there is no practicable alternative.

Although, as described above, there is a potential for reasonably foreseeable future transportation and development projects to affect floodplains, they would be required to comply with the ordinances and regulations that restrict development in floodplains and affects on flood elevations. Therefore no significant cumulative impact to floodplains is expected.

As shown on Figure 1, wetlands are scattered throughout the ICI study area. Most are within floodplains and/or associated with navigable waters and, therefore are within USACE jurisdiction under the Clean Water Act, with additional protection provided by the floodplain ordinances and regulations described above. Two substantial wetland systems occur at the southerly and northwest boundaries of the ICI study area.

Overall, jurisdictional and non-jurisdictional wetlands comprise approximately 1,312 acres of the ICI study area. An estimated 1,021 acres of these wetlands are within floodplains. A few wetlands may have been part of a larger system in the past. However, the pattern shown on Figure 1 is characteristic of their location within Georgia's piedmont region, where wetlands tend to be relatively small and found along adjacent to streams.

The wetlands within floodplains are unlikely to be affected by ongoing or future development projects, as they would be protected by floodplain development restrictions. Future development/redevelopment projects may have the potential to affect jurisdictional and non-jurisdictional wetlands that are outside of floodplains. However, these future projects will be required to be in compliance with Sections 404 of the CWA, as amended, which require a permit placement of fill in wetlands.

The proposed project is expected to affect 0.3-acre of jurisdictional wetland. Within the ICI study area, 35 acres of wetlands are within planned highway improvement corridors using the conservative assumptions described above. It can be expected that efforts will be made to avoid, minimize, and mitigate wetland impacts in developing these projects as per Sections 404 of the CWA, as amended and Executive Order 11990, which requires federal agencies to avoid use or modification of wetlands unless there is no practicable alternative.

Cumulative impacts to wetlands within floodplains are not anticipated, both because no notable wetland systems would be affected by a combination of projects that would substantially deteriorate their function and small wetland impacts would be avoided, minimized, or mitigated by federal law and regulation.

Streams in the ICI study area are shown on Figure 1 . As shown, approximately 119 miles of jurisdictional streams are within the ICI study area and are subject to regulation by the USACE in accordance with requirements of the CWA. The project corridor has 19 stream crossings. No new crossings are required by the project. Based on available data, approximately four miles of streams are within the corridors of future projects using the corridor width assumptions described above, which would include about nine stream crossings. New development/ redevelopment and future transportation projects affecting streams would be required to implement stream protection measures in accordance with requirements of the Georgia Erosion and Sedimentation Act of 1975, as amended and implemented by the GDNR, Environmental Protection Division. These measures include provision of a 25-foot vegetative buffer for warm-water non-trout streams and a 50-foot vegetative buffer for cold water trout streams. Encroachments to these buffers generally require a stream buffer variance that includes requirements for erosion control measures.

Other requirements for land-disturbing activities that may result in soil erosion and sedimentation include best management practices such as minimizing cut and fill, timely vegetation and re-vegetation, trapping runoff by use of debris basins, sediment basins, silt traps or similar measures. Also, permits require submittal of erosion and sedimentation control plans. Therefore, although streams could be affected by reasonably foreseeable future actions, based on protection requirements, cumulative impacts to streams and related effects to water quality are not anticipated.

2.3 Indirect and Cumulative Effects - 2013 FEIS Reevaluation

The study area for the assessment of cumulative effects for the project is linear, and consisted of the existing highway, additional project right-of-way, adjoining neighborhoods, and connected ecosystems. The study area began at Akers Mill Road, just south of the I-285/I-75 interchange and extended northward to the intersection of I-75 and I-575, where it splits. It continued on I-75 to the north terminus at Hickory Grove Road and followed I-575 to the second terminus at Sixes Road.

The above area was considered to be the project limit of influence for cumulative effects based on the following:

- The project is not expected to induce changes to existing or planned land use (see FEIS, Section 5.2).
- Additional right-of-way requirements are limited. Except for one segment, no more than 110 feet of right-of-way would generally be anticipated for the new reversible lane system, including the new managed-lane interchanges and slip ramps. However, up to about 150 feet of additional right-of-way would be required between South Marietta Parkway and SR 3 Conn/Roswell Road. Additional right-of-way would be required for the relocation of Frey's Gin Road at its intersection with SR 3 Conn/Roswell Road. No additional right-of-way would be required along I-75 between the I-75/I-575 interchange and Hickory Grove Road.
- The area described captures the full area of neighborhoods and natural resources that could be directly or indirectly affected by the project as well as by other past, present, and reasonably foreseeable future actions and result in a cumulative impact on those neighborhoods or natural resources.

2.3.1 Indirect Effects

Indirect effects could occur in the event project implementation resulted in one or both of the following:

- Development or redevelopment that is not currently planned for the study area.
- Traffic shifts on the existing surface street system.

Existing and Future Land Use Trends and Induced Development

According to long-term population projections (see FEIS, Table 3-3) and employment forecasts (see FEIS, Table 3-10), the region is predicted to continue to maintain its long term growth pattern despite the current recession regardless of whether or not the Preferred Alternative is selected and implemented.

Each local government in Georgia is required to prepare and implement a comprehensive plan consistent with Georgia Planning Act of 1989. The ARC, Cobb and Cherokee Counties, and the cities of Marietta, Smyrna, Acworth, Kennesaw, and Woodstock are responsible for developing land use plans, policies and strategies within the study area. The policies provide the basis for zoning, growth management and land use restrictions. The current regional plan and local comprehensive plans and their accompanying future land use maps portray a continued focus on higher density development capable of serving regional markets and trade areas and areas that provide the retail and service needs of several neighborhoods and communities, encouraging low to medium intensity office, retail and commercial service. They also focus residential development away from the areas immediately adjacent to I-75 and in areas along I-575 northeast of the I-75/I-575 interchange. These plans and policies were developed with public and local agency input and represent the communities' vision for the future. These plans and policies project continued long-term population and employment growth regardless of whether or not the Preferred Alternative is selected and implemented.

The Preferred Alternative was developed as a way to manage congestion created by the already established land use patterns in the region and provide trip reliability. The land use plans and future land use maps for the area paint a vision of continued growth with a focus on higher density development along the I-75 corridor and residential development beyond that and along I-575. Given the current and projected residential and employment trends and the future land use plans for the area, the Preferred Alternative is not likely alter development trends in the area or induce development that is not already planned for development would be planned according to the local jurisdictions.

Traffic Shifts

The project would not result in substantial shifts of traffic within the existing surface street system such that increases in traffic would be noticeable and/or require new traffic control measures. The project is projected to result in a 1 to 3 percent decrease in average daily traffic (ADT) on primary arterials that parallel I-75 and I-575 (*Traffic Technical Report 2013 Addendum*, Parsons Brinckerhoff, 2013).

These traffic shifts are the result of the complex and interrelated factors caused by the limited new capacity in the I-75 and I-575 corridors. The construction of the managed lanes adds some additional capacity to the project area as a whole, and to I-75 and I-575 in particular. This added capacity would be expected to cause a shift in traffic from parallel facilities such as US-41/Cobb Parkway. This is logical due to overall improvements in travel time on I-75 and I-575 in both the managed and general purpose lanes. The shift, however, would not be expected to be one-to-one. Rather, less traffic would shift from the parallel primary arterials than is forecast in the managed lanes. This would cause a reduction in travel times for the general-purpose lanes under the Preferred Alternative in comparison to the No-Build Alternative.

In the traffic analysis, some minor changes in traffic patterns were noted with the construction of the four new managed lane/local access interchanges on I-75. The new interchanges would add traffic to the cross streets at Terrell Mill Road, SR 3 Conn/Roswell Road, Big Shanty Road, and Hickory Grove Road. However the peak hour volumes are relatively small due to the single- or two-lane capacity of the managed lanes and the distribution of this traffic across 4 new interchanges. These volume increases were not substantial enough to require any overall improvements to the roadways beyond the immediate interchange ramps. Some minor volume changes were noted at the existing and planned managed lane interchange locations on I-75 due to redistribution to the new managed lane interchanges. None of these changes necessitated any changes in the existing roadway configurations.

A modal shift of trips to transit vehicles was also noted in the analysis. This shift reduced the overall traffic volume in the corridor under the Preferred Alternative, while the number of trips remained constant. In addition, more trips were made in higher capacity transit vehicles.

No development or redevelopment or substantial shifts in traffic on the existing surface street system are expected to be induced in the study area by the project.

2.3.2 Cumulative Effects

Actions Considered

Within the ICI study area, past actions include those that have resulted in a change from agricultural and woodland uses to urban features that include:

- Existing freeway and roadway system;
- Residential areas;
- Industrial facilities; and
- Commercial areas.

Present actions include:

- Proposed project; and
- Current development and redevelopment and associated infrastructure.

Reasonably foreseeable future actions include:

- Additional planned transportation improvements; and
- Future planned development and redevelopment and associated infrastructure as discussed in the FEIS, Section 3.1.2.

Additional planned transportation improvements in the ICI study area are shown in Table 3. These projects are considered reasonably foreseeable and include projects listed as long range (Plan 2040), as well as those shown as programmed for implementation (Transportation Improvement Plan). The reasonably foreseeable projects could contribute to cumulative effects to the extent their implementation would affect the same neighborhoods or natural resources as the proposed project.

Table 3 Planned Highway Capacity Improvements in the ICI Study Area

Project	Roadway Segment	Length (miles)	Status	Included in No-Build?
Northwest Corridor (I-75 and I-575) Managed Lanes	At Akers Mill Road to Hickory Grove Road on I-75 and from I-75 to Sixes Road on I-575	29.7	Programmed	No
I-285 North Managed Lanes (+4 lanes)	I-75 North in Cobb County to I-85 North in DeKalb County	13.1	Programmed	No
Bells Ferry Road Widening (+2 lanes) – 3 projects	Southfork Way to North of Sixes Road	5.2	Programmed	Yes
US 41 (+2 lanes)	Windy Ridge Parkway to SR 120 Loop (North Marietta Parkway)	5.9	Programmed	Yes
Big Shanty Road Widening (+2 lanes)	Chastain Meadows Parkway to Bells Ferry Road	0.4	Long Range	Yes
I-75 North	From I-285 North to Delk Road	0.5	Long Range	Yes
Leland Drive Extension (+2 lanes widening, 4 lanes new)	From Windy Hill Road to Terrell Mill Road	0.8	Programmed	Yes
Windy Hill Road Westbound Only (+1 lane)	From East of Powers Ferry Road to Spectrum Circle	0.2	Programmed	Yes
Busbee Frey Connector (4 lanes new)	From Busbee Parkway to Frey Road	2.0	Programmed	Yes
Powers Ferry Road Northbound Only (+1 lane)	From Wildwood Parkway to Terrell Mill Road	0.3	Programmed	Yes

Source: ARC, 2013

The *Atlanta Regional Managed Lane System Plan* (GDOT, 2010a) identifies a regional system of interconnected managed lanes throughout the Atlanta area. The regional system of managed lanes is of limited capacity, providing one or two travel lanes, sometimes in a reversible lane configuration and sometimes as bi-directional facilities. The facilities are all to be dynamically tolled, providing the opportunity to operationally manage usage by varying the toll rate. This enables the lanes to achieve a consistent travel time in comparison to the adjacent general-purpose lanes and a revenue stream to assist in paying for construction.

The construction of the lanes provide some limited congestion relief benefit, however by design and operation they are intended to be free flow facilities with few lanes. They do not, nor are they intended to, resolve or even substantially improve congestion in the general-purpose lanes. Since they are limited capacity facilities and are tolled, the implementation of the regional plan is unlikely to impact growth and development in the Northwest Corridor either indirectly or cumulatively.

Potential development and redevelopment activities described in the *City of Marietta Comprehensive Plan 2006-2030, The Roadmap to Marietta's Future* (Marietta, 2006) would occur in the vicinity of the project and other transportation improvements in the study area.

Effects Considered

Based on the methodology outlined in Section 2.0, potential cumulative effects of the project were evaluated for acquisitions and displacements; land use; economic resources; environmental justice; visual quality and aesthetics; air quality; noise; and water quality.

Acquisitions and Displacements

The number of full, partial and total acquisitions was incorrectly stated in the FEIS. The FEIS identified 13 full acquisitions and 63 partial acquisitions, for a total of 76 acquisitions. The correct number is 14 full acquisitions and 65 partial acquisitions for a total of 79 acquisitions.

The two additional partial acquisitions are from parcels in the southeast quadrant of I-285 and South Cobb Parkway. The proposed right-of-way line is shown on Sheet H-8 of Volume 2 of the FEIS, but no parcel numbers were shown and the parcels were not counted in the table.

The additional full acquisition is from a parcel in the southwest quadrant of I-75 and Roswell Road. The proposed right-of-way line is shown on Sheet H-8 of Volume 2 of the FEIS, but no parcel number was shown and the parcel was not counted in the table. While this parcel is an acquisition, there are no standing structures on it and the acquisition does not result in a relocation or displacement.

While the number of acquisitions has changed as a result of the parcel numbers being added, the right-of-way for the proposed project has not changed. The number of residential and commercial displacements has not changed. There are no additional impacts to minority or low-income populations.

The FEIS Reevaluation confirmed the potential for the displacement of six residential properties and seven business properties (12 businesses) by the Preferred Alternative. The relocations were still within the jurisdictional boundaries of the City of Marietta. The City's comprehensive plan still shows residential areas remaining residential. One potential highway widening project, the 5.9-mile widening and grade separation of US-41 (Cobb Parkway) between Windy Ridge Parkway and SR 12 (North Marietta Parkway), still has the potential for displacements. The

widening would occur exclusively within a business area. Based on visual observation, indications are that the businesses have sufficient setback and, while the widening could affect some business-related parking, no apparent displacements would occur. As a result, it was determined that, other than the six residences and six business properties affected by the Preferred Alternative, it was likely that other residences and businesses would remain. Based on the above, a relatively small number of acquisitions and displacements would be associated with the proposed project, City of Marietta land use plans, and the Cobb Parkway widening project. The contribution of the proposed project to cumulative effects of the identified transportation, development and redevelopment projects that might occur in the future was anticipated to be negligible.

Land Use

Cumulative impacts on land use could vary substantially depending on land use and growth policies and strategies put in place by the Atlanta Regional Commission (ARC), Cobb County and the City of Marietta and other agencies and local governments responsible for land use planning and policies. If the current policies are followed, most new residential development would be focused in areas away from regional and community centers and most nonresidential development would be focused along major arterials, highway interchanges, and high-capacity mass transit routes and collectors. If the land use policies are not followed and enforced through zoning and other means, then residential and commercial development could spread outside areas targeted for growth. This is true regardless of whether the No-Build or Preferred Alternative is selected and implemented.

Economic Resources

As with land use, cumulative impacts on economic resources could vary substantially depending on whether growth policies and strategies are followed. If growth occurs outside the areas targeted for growth, the local jurisdictions could experience increased costs to provide and maintain services.

Environmental Justice

The FEIS Reevaluation confirmed the potential displacement of six residences and 12 businesses by the Preferred Alternative. All of the affected residences and businesses were located in identified minority and low-income neighborhoods. The residential displacements were scattered over three different neighborhoods, while the businesses were concentrated in a single location. Because of the relatively small number of residential displacements and the minimal effect on the neighborhoods, the project contribution to the cumulative effect of displacements, when combined with other development-related displacements of minority and low-income persons was expected to be neglible.

An evaluation of the social equity effects of the *Atlanta Regional Managed Lane System Plan* was completed in January 2010. The study concluded that environmental justice communities are not disproportionately impacted by managed lanes and that the congestion reduction resulted in the potential for air quality benefits.

An earlier study, *HOT Lane Environmental Justice Analysis* (SRTA, 2006) that looked at the effects of tolling on environmental justice populations found that while regional implementation of HOT lanes did not appear to disproportionately impact any particular group when it did not include converting existing HOV or SOV lanes to HOT operation, implementation of HOT lanes would create localized environmental justice concerns.

In summary, while the cumulative effect of the Atlanta Regional Managed Lane System on environmental justice populations in the study area is not anticipated to be disproportionate, some areas of concern do exist. Key methods of addressing these concerns include an educational campaign, inclusive payment methods (e.g. a cash payment option) and access to information regarding the operations and benefits of managed lanes.

Visual Quality and Aesthetics

No change in project design occurred between the FEIS and the FEIS Reevaluation. As a result, there was no change in finding that the Preferred Alternative would not affect visual character or visually sensitive resources (FEIS Section 5.8). It would still result in a moderate effect on visual quality, as vertical structures associated with the managed lanes would be visible from some locations. Also, where the freeway is at- or above-grade, it would be seen from adjacent properties. Mitigation would include context–sensitive finishes for walls and to enhance areas where the project can be seen from adjacent properties and roadways.

In the context of visual effects, cumulative impacts would occur with implementation of multiple projects in the same viewshed. Because of the existing urban and developing environment along the I-75 and I-575 corridors and scattered nature of the potential transportation and development/redevelopment projects, which would affect a range of discrete views and visual settings, cumulative visual impacts were not anticipated.

Air Quality

Under the Clean Air Act, states with areas in nonattainment for one or more of the National Ambient Air Quality Standards (NAAQS) must develop a State Implementation Plan (SIP) that addresses each pollutant for which it fails to meet the NAAQS. In order to receive federal transportation funds within a nonattainment area, the area must demonstrate through a federally mandated transportation conformity process that the transportation investments, strategies and programs, taken as a whole, contribute to the air quality goals defined in the SIP. *PLAN 2040* contains a conformity determination report (CDR). The CDR demonstrates that the region's transportation strategies meet federal air quality requirements.

Cumulative impacts for air quality are considered via the regional emissions analysis associated with conformity as well as the regional assessment conducted for the FEIS Reevaluation. Table 3-2 of the *Air Quality Technical Report 2013 Addendum* highlights the regional impacts of the project by comparing the regional emission burdens of criteria pollutants of concern (CO, NOx, PM_{10}, $PM_{2.5}$ and HC) with and without the preferred alternative. This analysis is based on traffic projections developed using *PLAN2040* data which includes all approved projects as defined by the MPO.

The cumulative effect of the past, present and reasonably foreseeable actions within the study area are not expected to adversely affect air quality in the region. The Northwest Corridor Project is included in ARC's *PLAN 2040* RTP and FY 2012-2017 TIP (ARC, 2011c), which were adopted on July 27, 2011. The results of the emissions analysis for *PLAN 2040* demonstrate adherence to the established 20-county Motor Vehicle Emissions Budget. The conformity analysis was performed for the years 2016, 2020, 2030 and 2040. The analysis years meet the requirements for specific horizon years that the transportation plan must reflect as specified in 93.106(a)(1) of the *Transportation Conformity Rule* and specific analysis years that the regional emissions analysis must reflect per Section 93.118(b) and

93.118(d)(2). Since the eight-hour ozone standard attainment year falls outside of the *PLAN 2040* RTP horizon, a near-term year of 2016 was selected as the initial analysis year. This year is within five years of the conformity determination year of 2011, as suggested by the August 13, 2010 proposed *Transportation Conformity Rule Restructuring Amendment* revision to 93.118(b).

The FY 2012-2017 TIP is a direct subset of *PLAN 2040* RTP. The conformity determination for the FY 2012-2017 TIP includes the same set of projects; defined by their design concept, design scope and analysis years, as *PLAN 2040* RTP. The RTP and TIP are financially constrained consistent per 23 CFR Part 450 Subpart C (i.e., cost feasible). The funding source for construction and operation, if applicable, of all projects is identified and presented in Volume I, Appendix A. The FY 2012-2017 TIP also meets all other planning requirements including:

- Each program year of the FY 2012-2017 TIP is consistent with the federal funding that is reasonably expected for that year;
- Required state and local matching funds, and funds for projects funded entirely by state and/or local money, are consistent with the revenue sources expected over the same period;
- The FY 2012-2017 TIP is consistent with the conforming long-range plan such that the regional emissions analysis performed for the long-range plan directly applies to the TIP;
- The FY 2012-2017 TIP contains all projects which must be started in the TIP time frame to implement the highway and transit system envisioned by the long-range plan in each of its horizon years;
- All FY 2012-2017 TIP projects that are regionally significant are part of the specific highway or transit system envisioned in the long-range plan's horizon years;
- The design concept and scope of each regionally significant project identified in the FY 2012-2017 TIP are consistent with *PLAN 2040* RTP.

Upon completion of the technical conformity analysis, ARC staff determined that the *PLAN 2040* RTP and the FY 2012-2017 TIP together demonstrate compliance with the Clean Air Act as amended in 1990 in accordance with all conformity requirements as detailed in 40 CFR Parts 51 and 93 (the Transportation Conformity Rule) and 23 CFR Part 450 (the Metropolitan Planning Regulations as established in SAFETEA-LU, source: http://www.atlantaregional.com/plan2040/documents--tools). The *PLAN 2040* RTP and the FY 2012-2017 TIP were approved by the Georgia Regional Transportation Authority on August 18, 2011 and the FHWA issued a conformity determination on September 6, 2011. As such, the Northwest Corridor Project is part of a conforming RTP and TIP, and the cumulative impacts of the project have been thus evaluated. The Northwest Corridor Project also was included in the positive conformity determination for Amendment 10 of the *Envision6* RTP.

With regard to mobile source air toxics (MSATs), EPA issued its first Mobile Source Air Toxics Rule in 2001, which identified 21 mobile source air toxic (MSAT) compounds as being hazardous air pollutants that required regulation. A subset of six of these MSAT compounds were identified as having the greatest influence on health and included

benzene, 1,3-butadiene, formaldehyde, acrolein, acetaldehyde, and diesel particulate matter (DPM). In February 2007, EPA issued the Final Rule for Control of Hazardous Air Pollutants from Mobile Sources, which generally supported the findings in the first rule and provided additional recommendations of compounds having the greatest impact on health. The rule also identified several engine emission certification standards that must be implemented.

The EPA's 2007 Final Rule requires controls that will dramatically decrease MSAT emissions through cleaner fuels and cleaner engines. According to FHWA analysis, even if vehicle activity (vehicle-miles traveled, VMT) increases by 102 percent as assumed from 2010 to 2050, a combined reduction of 83 percent in the total annual emissions for the priority MSAT is projected for the same time period (FHWA *Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA*, December 6, 2012.).

In FHWA's view, information is incomplete or unavailable to credibly predict the project-specific health impacts due to changes in MSAT emissions associated with a proposed set of highway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by the uncertainty introduced into the process through assumption and speculation rather than any genuine insight into the actual health impacts directly attributable to MSAT exposure associated with a proposed action. Because of the limitations in the methodologies for forecasting health impacts described, any predicted difference in health impacts between alternatives is likely to be much smaller than the uncertainties associated with predicting the impacts. Consequently, the results of such assessments would not be useful to decision makers, who would need to weigh this information against project benefits, such as reducing traffic congestion, accident rates, and fatalities plus improved access for emergency response, that are better suited for quantitative analysis (FHWA *Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA*, *Appendix C*, December 6, 2012.)

Noise

For noise, the future year analysis includes projected traffic volumes and speeds for the project, forecasted background traffic growth, traffic growth resulting from other planned and programmed projects for the area and improvements in speed resulting from capacity improvements. As a result, the noise impacts predicted in the noise analysis and presented in the SDEIS, FEIS, and FEIS Reevaluation represent direct, indirect and cumulative noise impacts in areas where the project could influence traffic.

Water Quality

The Preferred Alternative would require an additional 85 to 150 feet of right-of-way along the approximately 10-mile segment between Akers Mill Road and the I-75/I-575 interchange. In the FEIS, the following impacts to water resources were identified: 17 acres of floodplain fill; 3,309 linear feet of surface water; and 0.0 acre of wetland. The surface water and wetland impacts would be mitigated by withdrawals of mitigation credits from existing USACE-approved or GDOT-owned stream and wetland mitigation banks.

For floodplains, streams and wetlands, the 44,022-acre study area was evaluated for potential cumulative effects on these resources. Figure 1 shows the ICI study boundary for these resources.

Planned highway improvements in the ICI area are listed in Table 3. The potential impacts of these projects to floodplains, streams and wetlands were calculated assuming a 500-foot radius from the center of interchanges and intersections. The resulting potential impacts are discussed below. The estimates are conservative, as the width/radius of many of the improvements includes existing roadways where development has already occurred and the specific characteristics of these projects is not known but are unlikely to affect the full width of such a corridor.

The ICI study area has an extensive network of streams and associated floodplains. Within the ICI study area, floodplains comprise approximately 4,816 acres. The existing project right-of-way includes about 138 acres of floodplain; the proposed project right-of-way includes less than 10 acres of additional floodplains since the majority of the project is located within existing right-of-way. The corridors for other planned highway improvements include approximately 142 acres of floodplains based on the corridor width assumptions described above. As shown in Figure 1 , the project corridor has 13 floodplain crossings with associated streams. Other planned highway projects would have about eight floodplain crossings with associated streams.

The project corridor is highly urbanized, with commercial, industrial, and residential development, and the surrounding study area is becoming increasingly urban. Therefore, as noted above, the area along the project corridor is mostly developed and, in some cases, older development may be within 100-year floodplains and already taken into account in floodplain mapping. Current and future development/redevelopment and associated infrastructure would occur within the parameters of existing local ordinances that govern development in floodplains. These ordinances avoid or minimize encroachments into floodplains and restrict land use that is incompatible with the natural function of floodplains.

The future highway projects shown on Table 3 are governed by Executive Order 11988, Floodplain Management; USDOT Order 5650.2, Floodplain Management and Protection; and Title 23, Section 650 of the Code of Federal Regulations. Floodplain impacts and significant encroachments are not permitted unless there is no practicable alternative.

Although, as described above, there is a potential for reasonably foreseeable future transportation and development projects to affect floodplains, they would be required to comply with the ordinances and regulations that restrict development in floodplains and affects on flood elevations. Therefore no significant cumulative impact to floodplains is expected.

As shown on Figure 1, wetlands are scattered throughout the ICI study area. Most are within floodplains and/or associated with navigable waters and, therefore are within USACE jurisdiction under the Clean Water Act, with additional protection provided by the floodplain ordinances and regulations described above. Two substantial wetland systems occur at the southerly and northwest boundaries of the ICI study area.

Overall, jurisdictional and non-jurisdictional wetlands comprise approximately 1,312 acres of the ICI study area. An estimated 1,021 acres of these wetlands are within floodplains. A few wetlands may have been part of a larger system in the past. However, the pattern shown on Figure 1 is characteristic of their location within Georgia's piedmont region, where wetlands tend to be relatively small and found along adjacent to streams.

The wetlands within floodplains are unlikely to be affected by ongoing or future development projects, as they would be protected by floodplain development restrictions. Future development/redevelopment projects may have the potential to affect jurisdictional and non-jurisdictional wetlands that are outside of floodplains. However, these future projects will be

required to be in compliance with Sections 404 of the CWA, as amended, which require a permit placement of fill in wetlands.

The proposed project is expected to affect 0.3-acre of jurisdictional wetland. Within the ICI study area, 35 acres of wetlands are within planned highway improvement corridors using the conservative assumptions described above. It can be expected that efforts will be made to avoid, minimize, and mitigate wetland impacts in developing these projects as per Sections 404 of the CWA, as amended and Executive Order 11990, which requires federal agencies to avoid use or modification of wetlands unless there is no practicable alternative.

Cumulative impacts to wetlands within floodplains are not anticipated, both because no notable wetland systems would be affected by a combination of projects that would substantially deteriorate their function and small wetland impacts would be avoided, minimized, or mitigated by federal law and regulation.

Streams in the ICI study area are shown on Figure 1 . As shown, approximately 119 miles of jurisdictional streams are within the ICI study area and are subject to regulation by the USACE in accordance with requirements of the CWA. The project corridor has 19 stream crossings. No new crossings are required by the project. Based on available data, approximately four miles of streams are within the corridors of future projects using the corridor width assumptions described above, which would include about nine stream crossings. New development/ redevelopment and future transportation projects affecting streams would be required to implement stream protection measures in accordance with requirements of the Georgia Erosion and Sedimentation Act of 1975, as amended and implemented by the GDNR, Environmental Protection Division. These measures include provision of a 25-foot vegetative buffer for warm-water non-trout streams and a 50-foot vegetative buffer for cold water trout streams. Encroachments to these buffers generally require a stream buffer variance that includes requirements for erosion control measures.

Other requirements for land-disturbing activities that may result in soil erosion and sedimentation include best management practices such as minimizing cut and fill, timely vegetation and revegetation, trapping runoff by use of debris basins, sediment basins, silt traps or similar measures. Also, permits require submittal of erosion and sedimentation control plans. Therefore, although streams could be affected by reasonably foreseeable future actions, based on protection requirements, cumulative impacts to streams and related effects to water quality are not anticipated.

3.0 References

American Association of State Highway and Transportation Officials, Center for Environmental Excellence, 2011. Practitioner's Handbook 12: Assessing Indirect Effects and Cumulative Impacts Under NEPA. April 2011.

Atlanta Regional Commission (ARC). 2007. Envision6, Volume I: 2030 Regional Transportation Plan. September 2007.

Atlanta Regional Commission (ARC). 2009. Envision6, Volume II: FY 2008-2013 Transportation Improvement Program (FY 2008-2013 TIP), Amendment 7. Adopted December 2, 2009.

Atlanta Regional Commission (ARC). 2011a. Volume I: PLAN 2040 Regional Transportation Plan. Adopted July 27, 2011.

Atlanta Regional Commission (ARC). 2011b. FY 2012-2017 Transportation Improvement Program (FY 2012-2017 TIP). Adopted July 27, 2011.

Atlanta Regional Commission (ARC). 2011c. Volume II: PLAN 2040 Conformity Determination Report. Adopted July 27, 2011 and approved by FHWA September 6, 2011.

CCR Environmental, Inc. 2009. Protected Aquatic Species Survey Report. Prepared for PB Americas, Inc. December 2009.

CCR Environmental, Inc. (CCR). 2012. Northwest Corridor Project, Protected Aquatic Species Survey Report. December 2012.

Environmental Protection Agency (EPA). 2007 Final Rule for Control of Hazardous Air Pollutants from Mobile Sources. February 2007.

Federal Highway Administration (FHWA). 2009. Interim Guidance Update on Air Toxic Analysis in NEPA Documents. September 30, 2009.

Federal Highway Administration and Georgia Department of Transportation (FHWA and GDOT). 2010. Northwest Corridor Project, Supplemental Draft Environmental Impact Statement. September 2010.

Federal Highway Administration and Georgia Department of Transportation (FHWA and GDOT). 2011. Northwest Corridor Project, Final Environmental Impact Statement. October 2011.

Federal Highway Administration (FHWA). 2011. Guidance on Environmental Justice and NEPA. December 16, 2011.

Federal Highway Administration (FHWA). 2012. Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA. December 6, 2012.

Federal Highway Administration and Georgia Department of Transportation (FHWA and GDOT). 2013. Northwest Corridor Project, Final Environmental Impact Statement Reevaluation. March 18, 2013.

HNTB Corporation (HNTB). 2010. Atlanta Regional Managed Lane System Plan, Technical Memorandum 9: Social Equity and Environmental Effects Evaluation. Prepared for Georgia Department of Transportation. January 2010.

HNTB Corporation (HNTB). 2011. Evaluation of Tolling Effects on Low-Income Populations, Northwest Corridor Project. Technical Memorandum. Prepared for Georgia Department of Transportation. October 2011.

HNTB Corporation (HNTB). 2013. Evaluation of Tolling Effects on Low-Income Populations, Northwest Corridor Project. Technical Memorandum Addendum. Prepared for Georgia Department of Transportation. March 2013.

Diana Hunt and Associates, Inc. 2010. Conceptual Stage Study, Northwest Corridor Study. Prepared for Parsons Brinckerhoff for the Georgia Department of Transportation. September 2010.

Diana Hunt and Associates, Inc. 2011. Northwest Corridor Project, Conceptual Stage Study. Prepared for Parsons Brinckerhoff for submittal to the Georgia Department of Transportation. October 2011.

Marietta, City of (Marietta). 2006. City of Marietta Comprehensive Plan 2006-2030, The Roadmap to Marietta's Future. Prepared by the Department of Development Services – Planning and Zoning Division. Adopted March 8, 2006.

Parsons Brinckerhoff. 2010. Northwest I-75/I-575 Corridor, Ecology Technical Report – Ecology Assessment/Description of Jurisdictional Wetlands, Non-Wetland Waters of the US and Protected Species Survey, Final. Prepared for the Georgia Department of Transportation. April 2010 and updated June 8, 2010.

Parsons Brinckerhoff. 2010. Northwest Corridor Project, Historic Resources Survey Report, Addendum III. Prepared for Georgia Department of Transportation. May 2010 and accepted as final June 1, 2010.

Parsons Brinckerhoff. 2010. Northwest Corridor Project, Air Quality Technical Report. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. September 2010.

Parsons Brinckerhoff. 2010. Northwest Corridor Project, Energy Technical Memorandum. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. September 2010.

Parsons Brinckerhoff. 2010. Northwest Corridor Project, Noise Technical Report. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. September 2010.

Parsons Brinckerhoff. 2010. Northwest Corridor Project, Traffic Technical Report. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. September 2010.

Parsons Brinckerhoff. 2011. Northwest Corridor Project, Addendum to June 2010 Ecology Technical Report, Ecology Assessment/Description of Jurisdictional Wetlands, Non-Wetland Waters of the US, and Protected Species Survey. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. July 27, 2011.

Parsons Brinckerhoff. 2011. Northwest Corridor Project, Historic Resources Survey Report Addendum IV. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. August 2011 and accepted as final September 2, 2011 with revisions.

Parsons Brinckerhoff. 2011. Northwest Corridor Project, Air Quality Technical Report. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. October 2011.

Parsons Brinckerhoff. 2011, Northwest Corridor Project, Cultural Resources Report. Compendium of all archaeological and historic resource survey reports and Section 106 agency consultation correspondence. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. October 2011.

Parsons Brinckerhoff. 2011. Northwest Corridor Project, Ecology Technical Report. Compendium of ecological resource reports and Section 7 agency consultation correspondence. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. October 2011.

Parsons Brinckerhoff, 2011. Northwest Corridor Project, Noise Technical Report. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. October 2011.

Parsons Brinckerhoff. 2011. Northwest Corridor Project, Traffic Technical Report. Prepared for the Federal Highway Administration and the Georgia Department of Transportation. October 2011.

Parsons Brinckerhoff. 2013. Northwest Corridor Project, Traffic Technical Report 2013 Addendum, March 2013.

Parsons Brinckerhoff. 2013. Northwest Corridor Project, Noise Technical Report 2013 Addendum, March 2013.

Parsons Brinckerhoff. 2013. Northwest Corridor Project, Air Quality Technical Report 2013 Addendum, March 2013.

Parsons Brinckerhoff. 2013. Northwest Corridor Project, February 2013 Addendum to the June 2010 Ecology Technical Report. March 2013.

RS Webb & Associates, Inc. 2010. GDOT Archaeological Report, Short-Form for Negative Findings: Addendum – Phase I Archaeological Resources Survey of Additional Right-of-Way and Easements for the Proposed I-75 and I-575 HOV Lane Construction, Northwest Corridor. Prepared for PB Americas, Inc. for submittal to the Georgia Department of Transportation. Accepted as final by SHPO January 20, 2010.

Terry Hayes and Associates (TAHA). 2010. Northwest Corridor Project, Environmental Justice Letter Report. Prepared for Parsons Brinckerhoff. August 2, 2010.

The Louis Berger Group, Inc.,2001a. Guidance for Assessing Indirect and Cumulative Impacts of Transportation Projects in North Carolina. Volume I: Guidance Policy Report. Prepared for the State of North Carolina Department of Transportation/Department of Environment and Natural Resources. November 2001.

The Louis Berger Group, Inc.,2001b. Guidance for Assessing Indirect and Cumulative Impacts of Transportation Projects in North Carolina. Volume II: Practitioner's Handbook. Prepared for the State of North Carolina Department of Transportation/Department of Environment and Natural Resources. November 2001.

The Louis Berger Group, Inc. 2002. National Cooperative Highway Research Program (NCHRP) Report 466. Desk Reference for Estimating the Indirect Effects of Proposed Transportation Projects. Prepared for the Transportation Research Board (TRB)-National Research Council. 2002.

The Louis Berger Group, Inc.,2004. Final Guidance. Revision to the NCDOT/NCDENR Guidance for Assessing Indirect and Cumulative Impacts of Transportation Projects in North Carolina. Volume II: Practitioner's Handbook. Section II: Pre-Screening Projects for Applying Indirect/Cumulative Impact Assessment. Prepared for the State of North Carolina Department of Transportation/Department of Environment and Natural Resources. January 2004.

Third Rock Consultants. 2012. Technical Memorandum, Anabat® Call File Analysis. Memorandum prepared by James Storm of Third Rock Consultants and prepared for Parsons Brinckerhoff. October 2012.

Third Rock Consultants. 2012. I-75/I-575 Northwest Corridor Project, Protected Species Survey Report for Myotis Sodalis, Indiana Bat. September 2012.

Appendix F Air Quality Memorandum

DEPARTMENT OF TRANSPORTATION
STATE OF GEORGIA

INTERDEPARTMENT CORRESPONDENCE

FILE P.I. No. 0008256 **OFFICE** Environmental Services

DATE May 13, 2013

FROM Amber L. Phillips

TO File

SUBJECT CSNHS-0008-00(256), Counties Cobb & Cherokee - Northwest Corridor

The air quality analysis for this project is in compliance with federal air quality laws and regulations. The air quality analysis for this project began in April of 2006. Since the MOVES model regional level data needed for MSAT toxins was not available at that time, the analysis utilized the Mobile model. The MOVES model for project level air analysis went into effect on December 20, 2012. Regional level analyses were not required to begin using MOVES until March 2013 and regional runs will not be available until the end of 2013. While the Atlanta Regional Commission (ARC) has their regional MOVES input data now they will not release it until they update their conformity model using the regional input data sometime this spring and have their models approved by the Environmental Protection Agency (EPA) and FHWA. Once approval is obtained, ARC will be able to use their input data and any other assumptions required for project purposes. Thus the regional data needed to run the MOVES model for the MSAT toxins was not available when this analysis began and still is not available.

EPA guidance indicates that projects begun after the MOVES effective date should utilize the new model and projects should not change models.

- EPA guidance states that projects started after December 20, 2012 need to be completed utilizing MOVES. Projects that already had complete air assessments prior to December 20, 2012 and environmental documents in the development process are not required to be updated at this time. As noted above, the air quality analysis for this project was begun in April of 2006 and thus utilized Mobile. Once quantitative data becomes available projects may or may not be required to be updated based on unique project factors. Examples of when a project may need to be updated include significant traffic changes or a new worst case signalized intersection being added to the project. Since the quantitative date is not available, it is not known at this time if this project will have any unique factors requiring an update to the air quality analysis.

- Projects also need to be completed using the same model, i.e., projects that initially utilized the Mobile model must continue to use the Mobile model. Since MOVES input data is not available for MSATS the air report was completed utilizing the Mobile model. Any future updates, if needed, will continue to utilize the Mobile model.

Appendix G Agency Concurrence

Vance C. Smith, Jr., Commissioner

GEORGIA DEPARTMENT OF TRANSPORTATION

One Georgia Center, 600 West Peachtree Street, NW
Atlanta, Georgia 30308
Telephone: (404) 631-1000

August 26, 2010

Mr. Daniel R. McDuff
Deputy Director / Chief Engineer
Cobb County Department of Transportation
1890 County Services Parkway
Marietta, Georgia 30008

Re: Project CSNHS-0008-00(256), Cherokee and Cobb Counties,
P. I. No. 0008256
Bob Callan Trail

Dear Mr. McDuff:

The Georgia Department of Transportation (GDOT) is continuing with the development of the above noted project. The Draft Environmental Impact Statement (DEIS) was completed in April 2007. Based on comments received, as well as the current funding realities, GDOT decided to develop a reduced alternative. We are preparing a Supplemental Draft Environmental Impact Statement (SDEIS) presenting this revised alternative and will provide a copy for you and others in Cobb County once the SDEIS is approved.

The purpose of this letter is to coordinate construction activities in the vicinity of the Bob Callan Trail (Trail) and to request your concurrence that the Northwest Corridor Project will not have an adverse effect to this Cobb County trail. The Trail, formerly a portion of the Rottenwood Creek Trail, is located in the southeast quadrant of the I-75/I-285 interchange on GDOT Right of Way. The Trail originates in the Chattahoochee River National Recreation Area, West Palisades Unit and extends north on the east side of I-75, crosses the Interstate North Parkway and connects to the programmed Interstate North Parkway Trail. The Trail is approximately 2.1 miles in length.

A Summary of Project Impacts

As proposed, the southbound I-75 managed lane ramp to the I-285 eastbound general purpose lane and the westbound I-285 ramp to the northbound I-75 managed lanes will pass over the Bob Callan Trail located in GDOT right-of-way. There will be no change in right-of-way ownership. No direct impacts are expected to occur to the Trail as a result of the Northwest Corridor Project. It is anticipated that construction in the area of the trail will result in periodic pacing of traffic during construction for safety reasons due to the Trail's proximity to the proposed work on the managed lane system. Pedestrian traffic will be maintained. Coordination will occur with the official with jurisdiction over the Trail prior to any work. No changes to the trail itself are anticipated; as such, no permanent adverse physical impacts will occur. No construction staging will occur on the Trail. Should there be any physical impacts to the trail, the affected land would be fully restored, i.e., returned to a condition which is at least as good as that which existed prior to the project.

Concurrence with the No Adverse Effects Determination

As the official with jurisdiction over the Bob Callan Trail, I concur that

- **any periodic trail traffic pacing would be temporary in duration;**
- **no changes to the trail would occur—any traffic pacing would be to assure the safety of trail users;**
- **no permanent adverse physical impact to the Trail would occur; and**
- **any physical impact to the Trail would be addressed so that the Trail would be returned to a condition which is at least as good as that which existed prior to the project.**

In addition, I understand that my concurrence serves to document the traffic management plan for the Bob Callan Trail is being considered by FHWA as an exception to the requirements of Section 4(f) per the conditions set forth in 23 CFR 774.13(d).

Signature: _____ **Date:** 26 AUGUST 2010

After signing and dating this letter, we ask that you return a copy of this letter to the attention of Keisha Jackson at the Georgia Department of Transportation, 600 West Peachtree Street, NW, Atlanta, GA 30308. We appreciate your assistance in making this transportation project possible.

If you have any questions or concerns, please feel free to contact John Hancock, the project manager at (404)631-1711 or via email at jhancock@dot.ga.gov or Keisha Jackson, the project environmental specialist at (404)631-1160 or via email at keijackson@dot.ga.gov.

Sincerely,

Glenn Bowman, P.E.

Glenn Bowman, P.E.
State Environmental Administrator

GB/gb/kj

DEPARTMENT OF TRANSPORTATION

STATE OF GEORGIA

INTERDEPARTMENT CORRESPONDENCE

FILE P.I. #0008256

OFFICE Environmental Services

DATE September 13, 2011

FROM Chad Carlson

TO Files

SUBJECT GDOT Project CSNHS-0008-00(256), Cherokee and Cobb Counties, P.I. #0008256, HP #021114-001; No Historic Properties Affected

Attached is the Finding of No Historic Properties Affected document prepared by Matt McDaniel of Parsons Brinckerhoff of Atlanta, GA, for the subject project. The Department has reviewed and concurs with the findings of this report. This finding fulfills the Department's responsibilities under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and subsequent amendments. We are requesting concurrence based on a change in the APE. A report which fulfills the Department's responsibilities under Section 106 for archaeological sites will be submitted separately.

CBC/

cc: Rodney N. Barry, P.E., FHWA, w/attachment (Attn: Chetna Dixon)
David Crass, Deputy SHPO, w/attachment
Atlanta Regional Commission, w/attachment

CONCUR: _____ **DATE:** 9/16/11
for David Crass, Deputy SHPO

cc: John Hancock, Assistant P3 Administrator
Keisha Jackson, GDOT NEPA

United States Department of the Interior

Fish and Wildlife Service
105 Westpark Drive, Suite D
Athens, Georgia 30606

West Georgia Sub Office
P.O. Box 52560
Ft. Benning, Georgia 31995-2560

Coastal Sub Office
4980 Wildlife Drive
Townsend, Georgia 31331

March 7, 2013

Mr. Rodney Barry, P.E.
Division Administrator.
Federal Highway Administration, Georgia Division
61 Forsyth Street, SW
Suite 17T100
Atlanta, Georgia 30303
ATTN: Ms. Chetna Dixon

RE: USFWS Log# 04EG1000-2013-I-0455/04EG1000-2013-CPA-0331, GDOT P.I. No. 0008256

Dear Mr. Barry:

Thank you for your March 5, 2013, electronic mail regarding Georgia Department of Transportation (GDOT) project CSNHS-0008-00(256). We submit the following comments under provisions of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*) and the Fish and Wildlife Coordination Act (FWCA) (48 Stat. 401, as amended; 16 U.S.C. 661 et. seq.)..

GDOT proposes to construct reversible, managed lanes on Interstate 75 and Interstate 575 in Cobb and Cherokee Counties, Georgia. Collective transportation improvements are referred to as the Northwest Corridor Project.

The project lies within the: (1) potential summer range for the endangered Indiana bat (*Myotis sodalis*); (2) known range of the threatened Cherokee darter (*Etheostoma scotti*) within the Clark Creek drainage; and (3) within potential range of the endangered gray bat (*Myotis grisescens*), as determined from calls recorded during August 2012 acoustic surveys. GDOT's February 12, 2013, consultation package indicates that approximately, 3,309 linear feet of stream channel would be displaced by the project.

GDOT committed to implementing special stormwater infiltration measures outlined in the proposed Etowah Habitat Conservation Plan, designed to minimize and avoid indirect effects of the project to downstream Cherokee darter populations in Clark Creek and its tributaries. GDOT will provide our agency with its stormwater control and infiltration plan prior to finalization of the construction plans. Clearing of trees along the project will be implemented during the period of time when Indiana and gray bats are not in their respective summer habitats and should not be roosting or foraging along the project corridor.

We concur with your determination that the project is not likely to adversely affect the Cherokee darter, Indiana bat, and gray bat. Your agency satisfied obligations of section 7(a)(2) of the Act and formal consultation is not required. However, obligations under the Act must be reconsidered if: (1) the project is modified in a manner not considered by this assessment; (2) a new species is listed or critical habitat is determined that may be affected by the project; or (3) new information indicates that the project may affect listed species or critical habitat in a manner not previously considered.

7 March 2013
Mr. Rodney Barry, P.E.
Federal Highway Administration
RE: CSNHS-0008-00(256), P.I. 0008256
Northwest Corridor Project, Cobb/Cherokee

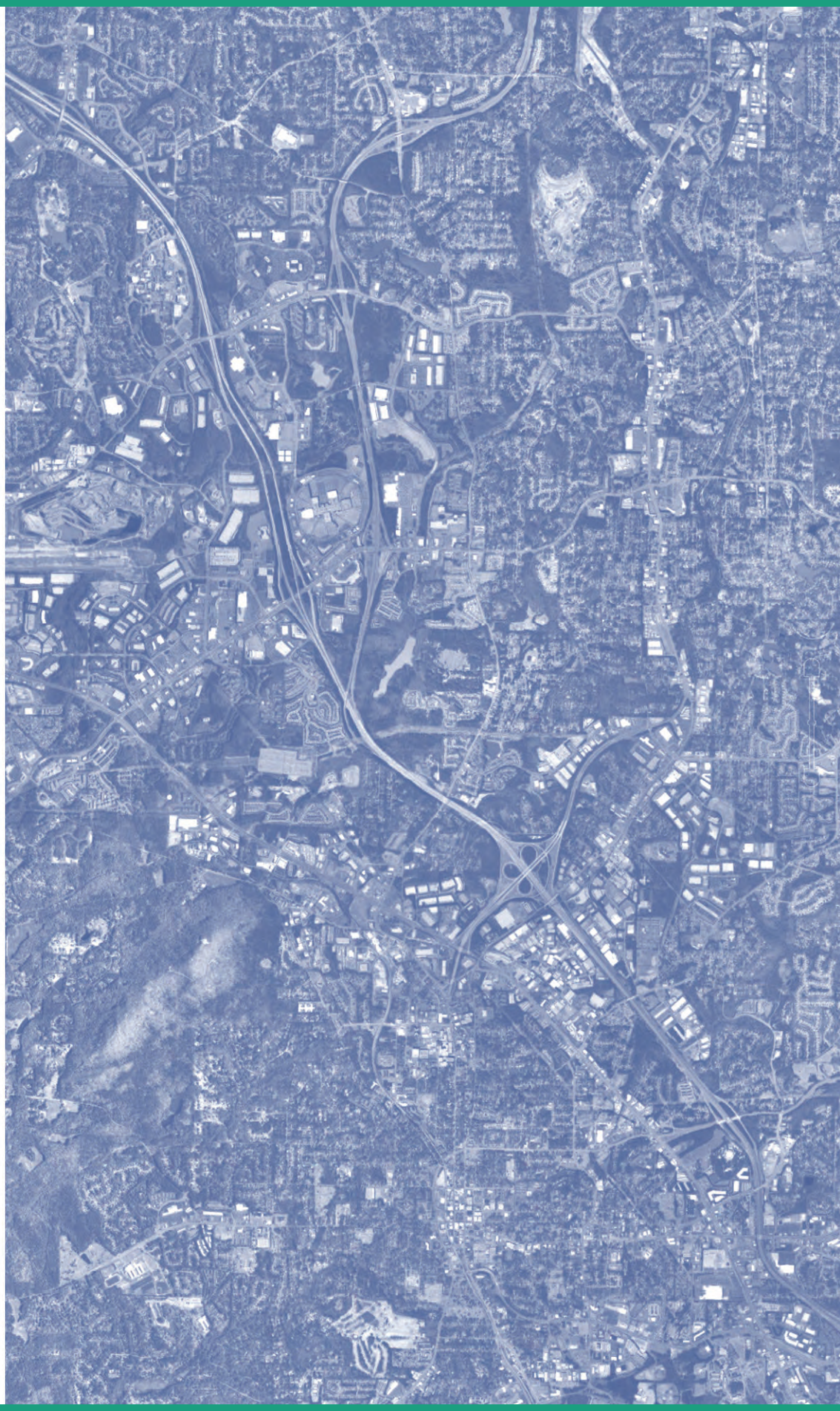
GDOT investigated options to minimize and avoid impacts to the stream and wetland resources. Further avoidance of resources was not practicable due to design constraints. GDOT would mitigate for impacts with the acquisition of stream and wetland restoration credits from an approved mitigation bank. GDOT's mitigation proposal satisfies your agency's responsibilities under FWCA. No additional compensation is necessary.

If you have any questions or require further information, please contact biologist Pete Pattavina, at 706-613-9493.

Sincerely,

Sandra S. Tucker
Field Supervisor

cc: Doug Chamblin, GDOT
file



I-575

I-75

NWCP

NORTHWEST
CORRIDOR
PROJECT