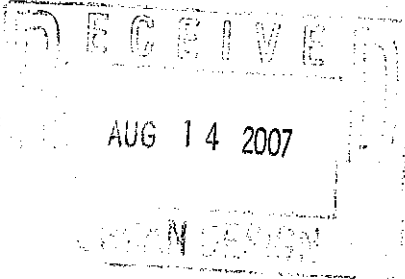




ATLANTA REGIONAL COMMISSION

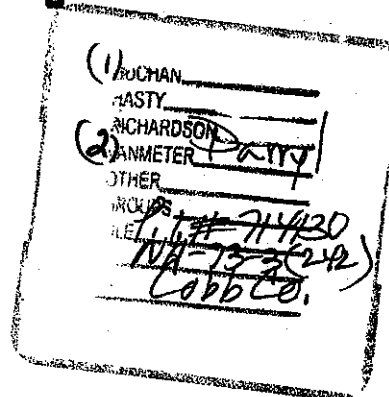
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COPY

August 13, 2007

Mr. Harold E. Linnenkohl
Commissioner
Georgia Department of Transportation
#2 Capitol Square, S.W.
Atlanta, GA 30334-1002



RE: Comments on the Northwest I-75/I-575 Corridor Alternatives Analysis / Draft Environmental Impact Statement

Dear Commissioner Linnenkohl:

Attached are ARC comments on the Northwest (I-75/I-575) Corridor Project.

ARC staff appreciates the work of the Department in providing for an inclusive environment during the development of this project. We look forward to working with the Department in meeting the congestion challenges of our region.

Sincerely,

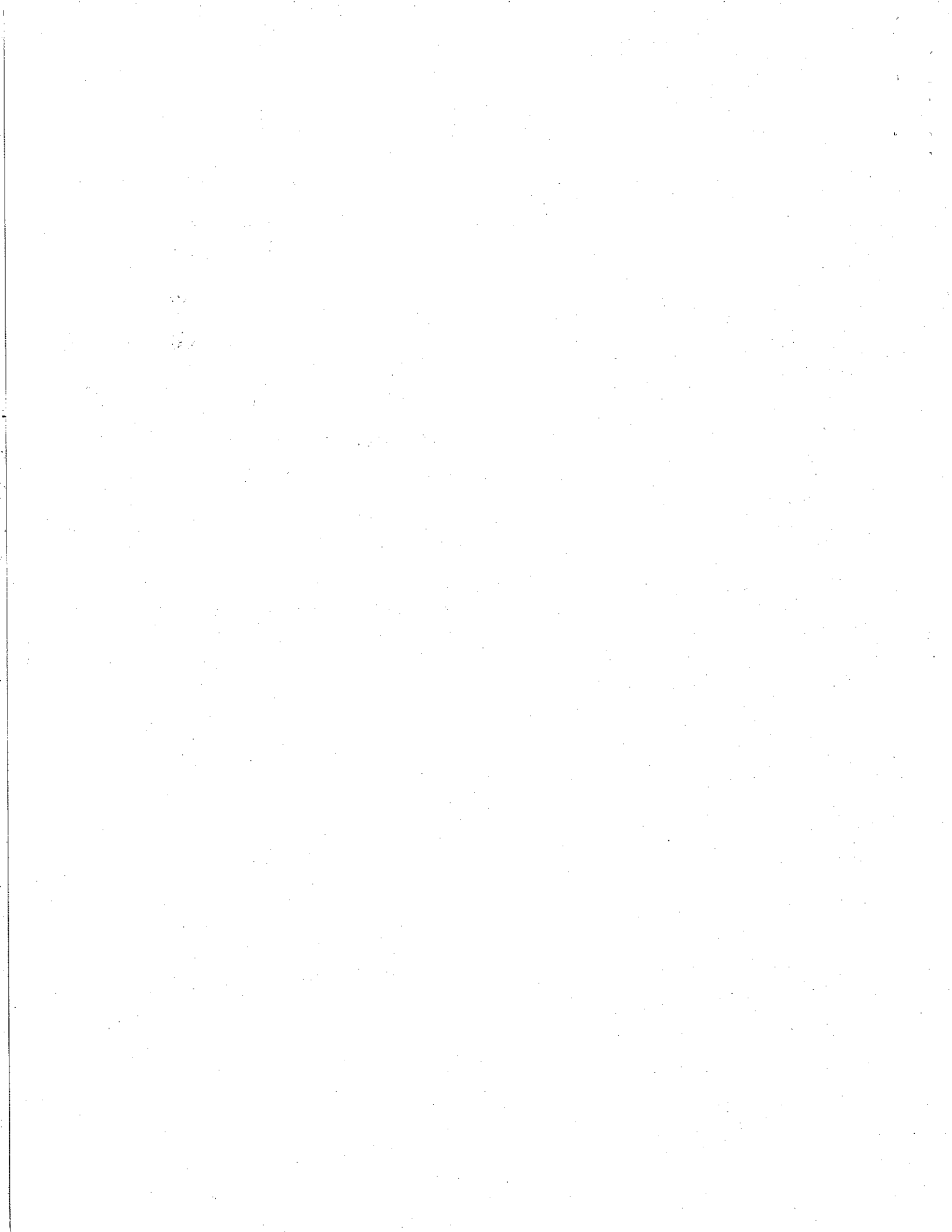
Charles Krautler
Director

c: Glen Bowman, GDOT
Darryl VanMeter, GDOT
Steve Stancil, GRTA

Attachments



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**Atlanta Regional Commission
Staff Comments
Northwest I-75/I-575 Corridor
Alternatives Analysis/Draft Environmental Impact Statement**

General Comments

ARC staff appreciates the opportunity to provide official comments on the Northwest I-75/I-575 Corridor, Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS). We also acknowledge that ARC staff has been in attendance at regular GDOT/GRTA staff-level meetings as this document was being developed.

ARC comments are meant to provide further consideration of critical regional issues prior to the completion of the Final Environmental Impact Statement (FEIS). The final concept and design for this project will have far-reaching impacts on other regional interstate corridors and their congestion solutions. Therefore, fine tuning the AA/DEIS must be addressed before an FEIS is issued.

In November, 2005, the ARC staff provided comments during an early phase of the I-75/I-575 DEIS development. These comments along with others submitted on September 29, 2003 are attached. Many of these same comments remain as described in the context of this correspondence.

Alternatives Definition

ARC continues to question why GDOT did not include two additional build alternatives to include a TOL/TOT lane alternative without HOV (or other form of managed lanes) and a HOV/HOT alternative (or other form of commuter managed lanes) that did not include TOL/TOT lanes as alternatives to study. The DEIS needs to include the technical reason for including truck lanes in all alternatives.

Financial Feasibility

ARC is not convinced that GDOT can afford any of the build options in the DEIS without the proposed public private partnership. ARC staff does not know of any analysis of a feasible and affordable "scaled back" alternative if private funding were reduced or eliminated. This concerns ARC staff given the critical funding issues in the region.

The two tolling sub-alternatives listed are (1) High-Occupancy-Toll (HOT) defined as lanes "managed by pricing to assure that the SOVs using the HOV lanes do

not adversely affect the level of service for transit use", and (2) TOT lanes which could be mandatory or voluntary for heavy-duty through trucks. However, the DEIS does not state which tolling options is appropriate for this corridor. The DEIS should discuss all tolling options and describe the one most appropriate for this corridor. This has critical public involvement implications. Based on the financial plan and assumptions GDOT recently submitted for incorporation into the RTP/TIP for this project, the Department assumed a managed lane system where everyone pays (Electronic Toll Lanes) as well as Mandatory Truck only Lanes. The DEIS needs to clearly list and explain the various forms of HOT lanes (HOT2+, HOT3+, HOT4+/ ETL). There needs to be a clear statement of whether the truck only toll lanes will be mandatory or voluntary. ARC has heard from the freight industry that they would not support a mandatory truck only toll lane facility.

Truck Lanes

Including truck lanes has implications to the regional expressway system. The long term goals of GDOT regarding truck lanes in the Atlanta metro area have not been expressed. A more thorough discussion is needed to understand how the truck lanes in this project fit into a larger plan for the region. In addition, the ARC strongly encourages GDOT as a participant in ARC's Freight Advisory Task Force, to vet these ideas through that group. This is a valuable opportunity for the GDOT to obtain feedback and develop the long term policies for truck lanes.

The through-truck analysis is consistent with the preliminary findings of ARC's Freight Mobility Study. I-75 is one of the main interstates in the region for through-truck movement. According to the AA/DEIS, at I-285, approximately 85 percent of the trucks in the southbound direction and 90 percent in the northbound direction are through-trucks. It appears that a substantial proportion of the truck traffic is through-truck movement serving the needs of businesses outside the Northwest Corridor. The document indicates that the terminus is logical for the truck-only-lanes and it also states that the project build alternatives include a system-to-system connection between the proposed truck-only lanes on I-75 and the general-purpose lanes on I-285. However, by directly connecting the I-75 truck only lanes directly to auxiliary lanes at the I-285 interchange, a major bottleneck will be created. The lack of a system wide truck only lane (I-75/I-285W/I-75S) would impact the success and overall benefit of the truck only lane in the I-75 project. It seems very unlikely that a significant number of other freeway corridors, particularly in urbanized areas, can be retrofitted to accommodate truck only lanes, if the cost of this project is indicative. Please provide a discussion of the independent utility of these lanes if no other corridors in the metro region can be improved with a similar scope.

There is no mention of potential impacts on local arterials from trucks trying to avoid paying tolls. This is a critical piece of information needed for regional planning and must not be overlooked.

Overall the goal of the project is good. According to the freight and truck movement impact section, the goal is to improve transportation effectiveness by improving mobility for people and goods. The No-Build Alternative would result in increased delay to trucks moving freight through the corridor. The provision of truck-only lanes on I-75 would improve the movement of freight through the corridor. This would result in reduced travel times for trucks using the truck-only lanes under the build alternatives as compared to remaining in the general-purpose lanes under the No-Build Alternative. Reduced travel times also translate to reduced costs for freight shipping companies.

However, there are some contradictory statements in the document regarding the purpose of the truck only lanes. In the corridor systems impacts section (p. 4-8), it states that "The toll for truck-only toll (TOT) lanes is assumed to be for revenue purposes only, not for managing the volume of trucks in the truck-only lanes. The through-truck volumes are not high enough to warrant application of a toll for the purpose of managing truck volumes in the truck-only lanes by time of day." In another statement (p. 7-2), it states that" the tolls would be applied not only as a lane management tool to assure free-flow conditions, but also as a revenue source to help defray the cost of construction of the lanes." In another statement (p. 7-33), it states that..."the tolls would be collected as a revenue source to help defray the cost of construction. Because both truck-only lanes and TOT lanes are equally effective in improving transportation in the Northwest Corridor, and they are similar in costs, the only difference in the TOT Lane Option compared to the build alternatives is financial feasibility." It appears as though the motive behind the truck only lane is primarily for revenue generation and not congestion relief or improving freight mobility in the corridor.

Regional Congestion Mitigation Goals

The technical analysis process recently completed by ARC to reflect 70% congestion mitigation weighting and cost/benefit in project prioritization for the RTP, was conducted on the Mobility 2030 concept for the corridor. The information for the project as now defined in the AA/DEIS was not available at the time that ARC was undertaking the technical evaluation. The concept ARC evaluated in the current RTP/TIP process did not include key scope elements of the current PPI proposal and was approximately half the cost. Please explain the methodology GDOT has employed to ensure the updated scope and costs are consistent with CMTF guidance and are a wise investment of the region's limited transportation funds.

Land Use Issues

The project will provide substantial new vehicle mobility in the corridor but at a substantial cost. The commuter station designs coupled with BRT would be more likely to produce substantial transit oriented development if integrated with new housing, retail and office development at an urban scale. The station areas should be fully integrated with mixed-use public uses and private development rather than commuter stations only. The stations as currently designed are intended for automobile commuters, located close to the interstate with large parking facilities. While some transit oriented development is likely to occur, the station designs are not conducive to large scale TOD or expansion of urban development in centers. It is currently unclear whether the affected local governments have adopted station area plans associated with the proposed stations. Nor is it clear how the project can assure maximum land use benefit from the substantial transit investment.

As stated in Table 5-3 (p. 5-5), all "Build Alternatives" in the corridor are consistent with regional plans, local comprehensive plans and Livable Centers Initiative (LCI) plans. Conversely in Table 5-3, all "No Build" alternatives are considered inconsistent with applicable regional and local plans. The basis for this finding is stated as: "The No-Build Alternative is not compatible with planned land use and development as it would not provide the needed transportation infrastructure and services to support this growth. In contrast, each of the build alternatives would be able to support planned development."

This statement is overly simplistic. The regional, local and LCI plans and goals in the corridor are complex and the resulting development that will be permitted is diverse. The Regional Development Plan (RDP) seeks more growth and development in major transportation corridors as well as centers. The I-75 corridor is designated as a "Mega-Corridor" on the Unified Growth Policy Map (UGPM). The Mega-Corridor areas are intended to be locations of future dense development with multi-story buildings and urban scale.

The Build Alternatives will provide substantial automobile and transit capacity in the corridor. It is likely that greater transportation infrastructure and the introduction of BRT service would provide impetus for more dense development. However, more dense development will occur as a result of existing population and employment growth pressures in the corridor, regardless of the alternative selected and it is not clear what the development projections are and how they compare with regional forecasts.

LCI plans along the corridor represent both smaller town centers such as Woodstock and major activity centers such as Cumberland-Galleria. The impacts

of the I-75 project on the LCI plan in the City of Woodstock are likely to be minor while impacts to the growth of Cumberland-Galleria could be extensive.

The section on Consistency with Regional Land Use Plans (p. 5-6) states that the Build Alternatives are consistent with regional land use plans and development trends. The section also discusses the fiscal stress on local governments to accommodate growth. It is unclear how the I-75 improvements benefit the discussed fiscal problems of local governments to manage growth. It is also unclear as to whether fiscal impact estimates have been completed. The Atlanta region is a large and complex region. It can be argued that major improvements in a single interstate corridor at the scale proposed are not a cost effective solution if the project funding prevents the ability to fund many smaller and necessary improvements in the region.

The section states (p. 5-6) that "the region faces worsening air quality due to ever increasing congestion problems and a funding shortfall for maintenance and expansion of the roadway system." Air quality will always be a concern for the Atlanta region. However, it should be noted that current ARC regional air quality conformity determinations show that the Atlanta region will meet the State air quality goals for ozone and fine particulate matter. These reports are based on the current long range Regional Transportation Plans for the 18-county Atlanta transportation planning boundary, and are approved by the USDOT in conjunction with the USEPA.

The section (p. 5-6) states that specifically the I-75 improvements support the following RDP policies:

- Policy 1 – "Provide development strategies and infrastructure investments to accommodate forecast population and employment growth more efficiently."
- Policy 2 – "Guide an increased share of new development to the Central Business District, transportation corridors, activity centers and town centers."
- Policy 3 – "Increase opportunities for mixed-use development, infill, and redevelopment."
- Policy 4 – "Increase transportation choices and transit-oriented development (TOD)."

These four RDP policies are not the most recent adopted by the ARC Board. Updated RDP policies were adopted in May 2006. The May 2006 RDP policies are attached with these comments.

The No-Build Alternative section (p. 5-6) states "The No-Build Alternative would have no effect on regional land use and development. This alternative would not

support policies for sustainable development advocated by the ARC. Existing land development patterns, dominated by suburban development, would continue."

As growth continues in the region and corridor even without improvements, the likelihood of more "suburban development" will diminish. Already in many areas of the region and I-75 corridor, more dense residential and mixed-use development is occurring. This redevelopment and infill is at higher densities than suburban development that occurred in the corridor 10 or 20 years earlier. Increased demand for housing in proximity to job centers is occurring. This demand is partially related to travel costs and time required for automobile commuting, but also more demand for housing with access to other amenities. This demand for housing has created land values and development that will continue without any substantial changes to I-75.

Table 5-4 (p. 5-7) shows the consistency of the build alternatives to each RDP policy. However, the section does not describe the methodology to determine the consistency.

The section regarding anticipated changes at proposed BRT stations (p. 5-99), states "The development plans (BRT station areas) represent a public consensus that has not yet been adopted into city and county land use plans. The adopted land use plans, however, would ultimately affect the types and densities of land development that would be expected to occur in these BRT station areas." Considering local government progress on enabling urban densities and transit oriented development, the time and effort required for local governments to approve new land use plans, development regulations and permits for development could be substantial. It cannot be assumed that the resulting development will be specifically supportive of the proposed station area concepts.

The Neighborhoods Section (p. 5-113) states "Underused properties would be developed and integrated into the transit-oriented plans adopted by the jurisdictions in the area. Neighborhood amenities, such as parks and entertainment venues, would also increase. The displacement of households from certain neighborhoods, however, could cause others to voluntarily relocate away from the freeway corridor. However, there would be a certain number of people who would move into the study area who would want the traditional suburban lifestyle and there would be perhaps increased development to support those who want it. As such, indirect effects on neighborhoods would be mixed."

The above statement appears worded incorrectly. The crux of the statement appears to assume that transit oriented development will be permitted and other amenities such as "parks and entertainment venues" constructed. The result would be relocations of some existing residents but replacement by new

residents. The basic scenario seems plausible but the time, effort and finances required for such a major shift to transit oriented development could be substantial. ARC suggests that actions by local development authorities and local governments support the station area designs that integrate mixed use development.

The Section on station area development trends states (p. 5-100) "Residential – The corridor is experiencing changing residential development trends. Increasing congestion and lengthening duration of commutes have led a growing number of households to be interested in purchasing housing located in more central locations. The project corridor, and the Cumberland station area in particular, is benefiting from this trend."

"Over 3,000 new residential units are planned in the Cumberland area. This is expected to bring a significant residential component to this edge city. Rising land costs and limited land availability are leading to increased residential densities, especially for in-fill locations. To keep housing affordable, town homes and condominiums are becoming an increasingly popular form of home ownership. As a result, town homes now represent approximately half of new home sales in the corridor. It is anticipated that condominiums will become increasingly popular at Town Center and mixed-use locations like Marietta Square, Vinings, and the proposed BRT station areas."

The above statements contradict the statement in Section 5.2.4.1 No-Build Alternative, which contends that "The No-Build Alternative would have no effect on regional land use and development. This alternative would not support policies for sustainable development advocated by the ARC. Existing land development patterns, dominated by suburban development, would continue."

Transit Issues

More explanation needs to be provided on the transit service south of the I-75/I-285 interchange. This segment is a critical link in the BRT system. This explanation should address operational issues such as bus headways as well as the cost of providing BRT service in this corridor. In addition, bus volumes need to be detailed for this segment in that there are no barrier-separated HOV lanes on this part of the BRT route. The study should also address how the buses will be routed once off the interstate, especially in Midtown and the Atlanta CBD.

ARC staff is concerned about the feasibility of the Terrell Mill Road pedestrian bridge. The bridge will cross over a substantial distance. Key issues must be addressed for the transit user, such as safety, mobility for disabled users, sound attenuation, protection from the weather and other factors. Although in theory

the bridge may be satisfactory, there are a great many practical issues that need to be addressed.

It is not clear that Cobb Community Transit has agreed to pay the operating funds, nor is it clear what the full operating amount would be for the proposed BRT system. How operating funds are covered should be a part of this study as well. It is also unclear how the existing Xpress service for Cherokee County will be integrated into the BRT system.

Summary

ARC staff appreciates your attention to these issues and look forward to your response. We hope to work with you in meeting the congestion challenges of our fast-growing region.

Envision6 Regional Development Plan Land Use Policies

Developed Area Policies

1. Promote sustainable economic growth in all areas of the region.
2. Encourage development within principal transportation corridors, the Central Business District, activity centers, and town centers.
3. Increase opportunities for mixed-use development, transit-oriented development, infill and redevelopment.
4. At strategic regional locations, plan and retain industrial and freight land uses.
5. Design transportation infrastructure to protect the context of adjoining development and provide a sense of place appropriate for our communities.
6. Promote the reclamation of Brownfield development sites.

Housing & Neighborhood Policies

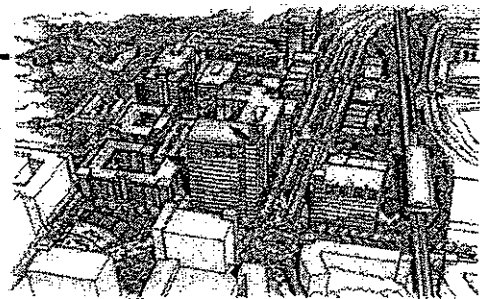
7. Protect the character and integrity of existing neighborhoods, while also meeting the needs of communities.
8. Encourage a variety of home styles, densities and price ranges in locations that are accessible to jobs and services to ensure housing for individuals and families of all incomes and age groups.
9. Promote new communities that feature greenspace and neighborhood parks, pedestrian scale, support transportation options and provide an appropriate mix of uses and housing types.
10. Promote sustainable and energy-efficient development.

Open Space & Preservation Policies

11. Protect environmentally-sensitive areas including wetlands, floodplains, small water supply watersheds, rivers and stream corridors.
12. Increase the amount, quality, connectivity and accessibility of greenspace.
13. Provide strategies to preserve and enhance historic resources.
14. Through regional infrastructure planning, discourage growth in undeveloped areas



Tuesday, May 16, 2006



Coordination Policies

15. Assist local governments to adopt growth management strategies that make more efficient use of existing infrastructure.
16. Inform and involve the public in planning at regional, local and neighborhood levels.
17. Coordinate local policies and regulations to support Regional Policies.
18. Encourage the development of state and regional growth management policy.



November 15, 2005

ARC Public Comments, NW I-75/575 Corridor DEIS

The Atlanta Regional Commission (ARC) is pleased to provide public comment on the NW I-75/575 DEIS. ARC believes this project will improve mobility by reducing congestion and providing better options for commuters along the corridor. The following questions and comments express some concerns the ARC has in regards to the Northwest Corridor (NW) I-75/I-575 Draft Environmental Impact Statement (DEIS). ARC wants to ensure the success of this project by raising these critical questions while continuing to work with GDOT and the regional planning partners through the regional planning process. ARC agrees that TOL/TOT lanes in the Atlanta region could provide significant benefits to regional mobility and economic stability. The TOL/TOT concept is a creative solution and ARC welcomes the opportunity to become involved in a coordinated and comprehensive regional look at a TOL/TOT system for the Atlanta region. ARC welcomes the opportunity to discuss these questions with GDOT staff.

(1) The Georgia Transportation Partners submitted a PPI (Public-Private Initiative) proposal for the I-75/575 corridor, which is currently awaiting GDOT Board approval. If successful, how will the NW I-75/575 DEIS interrelate with the PPI in the context of planning, design and financial implications?

(2) GDOT included four (4) TOL/TOT lanes and four (4) HOV/HOT lanes in **all build alternatives** in the NW I-75/575 DEIS. Why did GDOT not include two additional build alternatives to include a TOL/TOT lane alternative without HOV (or other form of managed lanes) and a HOV/HOT alternative (or other form of commuter managed lanes) that does not include TOL/TOT lanes?

(3) The complete reconstruction of the NW I-75/575 Corridor to include (4) TOL/TOT lanes and four (4) HOV/HOT lanes in **all build alternatives** will be very costly. If the PPI is unsuccessful, will GDOT have enough funding for the construction of one of the build alternatives without private funding? Will GDOT be able to provide this through a realistic financial plan?

(4) The TOL/TOT concept has not been comprehensively studied in sufficient detail and scope for the Atlanta region and has not been implemented anywhere in the United States. What is GDOT's technical basis for including TOL/TOT in all the build alternatives for the NW I-75/575 DEIS?

(5) GDOT is currently in the process of conducting a statewide truck lane study. What data will this study provide and how will the study coordinate with this DEIS? Will the DEIS be delayed if the statewide study is delayed?

(6) Many policy issues concerning TOL/TOT lanes are being evaluated through the DEIS process. Will these policy recommendation be vetted through a regional and systems planning process that include representation from regional and state planning with input from the freight industry?

(7) ARC understands that TOL/TOT lanes for NW I-75/575 DEIS will be limited to the project extent even though, ultimately, GDOT envisions a regional truck lane system. It seems likely that truck lanes along only one corridor will cause significant bottlenecks at the project limits. How will this be taken into account? If this same modeling feeds into TOT lane revenue estimation, what are the impacts?

(8) What is GDOT's public involvement plan to introduce the region to the new HOT/TOL/TOT concepts?

(9) When will GDOT disclose to ARC a realistic financial plan for the NW I-75/575 DEIS for RTP financial forecasting?



September 29, 2003

Mr. Jim Ritchey, Interim Executive Director
Georgia Regional Transportation Authority
245 Peachtree Center Avenue, Suite 900
Atlanta, Georgia 30303-1223

Dear Mr. Ritchey:

ARC staff recently attended a public meeting held by GRTA at the Cobb Central Library regarding the reduction of alternatives in the Northwest Connectivity Study. It is our understanding that you have narrowed the field of alternatives to three:

- **ALTERNATIVE A** – BRT in HOV Lanes from Busbee Park and Ride Lot to Arts Center MARTA Station;
- **ALTERNATIVE B** – LRT along US 41 from the North Loop to I-285, paralleling I-285 from Cumberland to Atlanta Rd./Marietta Blvd., following Atlanta Rd/Marietta Blvd to the Arts Center MARTA Station; and
- **ALTERNATIVE C** – BRT in HOV from Busbee Park and Ride to Roswell Road, in dedicated guideway along Franklin Rd, and US 41 to Cumberland Mall and Akers Mill Rd, with parallel service from that point as BRT in HOV lanes to Arts Center MARTA Station and BRT in HOV lanes along I-285 to Atlanta Rd/Marietta Blvd and continuing in dedicated guideway down this corridor to Arts Center MARTA Station.

ARC staff has three concerns with these alternatives we would like to share with you. In the analysis of preliminary model results for the 2030 Aspirations Plan, we have found that the HOV lanes in the I-75 north corridor are operating at volume to capacity ratios of 0.94 to 1.3 in the year 2030. This is to say that the HOV lanes in the northwest corridor are operating at a level of service of no better than E. Based on this analysis, we do not believe that operating a BRT in the HOV lanes will be successful in the long term.

However, we do believe that BRT could be successful if it were to operate in its own dedicated right of way. Our initial model results also indicate that the BRT performs well as long as it is not impacted by the other traffic in the I-75 corridor. It will be difficult for ARC to seriously consider any locally preferred alternative that does not operate in a dedicated guideway. Therefore, ARC recommends that any BRT alternative GRTA tests and costs should be in exclusive right of way throughout the corridor.

Mr. Jim Ritchey
September 29, 2003
Page Two

Additionally, we are concerned about the land use and economic development implications of locating stations in the right of way of I-75 instead of in commercial nodes. We feel that there is significantly more development potential to be realized if stations are located in activity nodes as opposed to adjacent to the interstate. For example, the Marietta, Smyrna, Cumberland, Bolton/Moores Mill, and Midtown LCI areas lie within this corridor and could be connected with this transit investment if the stations were located appropriately. We believe it is imperative to locate stations in these activity centers so as to reinforce the significant expenditure of public funds and effort that has already been made for the purpose of creating livable centers. We also believe that it is imperative to invest the region's limited resources in the development of transportation infrastructure so as to implement the policies laid out in the Regional Development Plan.

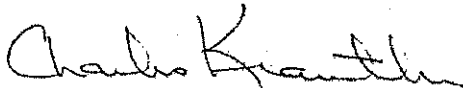
Finally, we believe that the proposed Alternative A is not substantially different from the operation of express buses in the HOV lanes currently under design by GDOT. ARC does not intend to negate the need for express bus operation from the northwestern suburban park and ride lots into the city center; we believe there is definitely a need to serve such trips. This need is demonstrated by the standing room only on CCT's express bus service into Midtown and Downtown. However, we do not believe that this type of service constitutes bus rapid transit. Nor do we believe that it will foster the type of land use changes sought by the Regional Development Plan. We also believe we should not exclude the possible need to furnish some sort of rail transit investment in this corridor in the future. Therefore, we would like GRTA to include in its conceptual engineering the possibility of a future conversion of the corridor to a rail option, including in this engineering any additional cost necessary to make the potential conversion possible.

Given the fact that the region's transportation funding is limited, it is of paramount importance that the region make the best decision for both the short term as well as the long term viability of this transportation corridor. Therefore, we would like to see GRTA redefine Alternative C as a BRT in exclusive right of way with express bus service in the HOV lanes of I-75. So doing would address each of our concerns. Additionally, if Alternative C were adopted as the locally preferred alternative, it would allow for the potential upgrade to rail technology in the future should ridership ever place excessive demands on the capacity of the BRT.

Mr. Jim Ritchey
September 29, 2003
Page Three

Thank you for your ongoing efforts in the I-75 corridor. We will continue to support you in the completion of the alternative analysis and hope that GRTA will support ARC's effort to prioritize in an open and transparent way the various transit projects the region currently has under study. Regional cooperation and deliberation inevitably produce the best products and result in the most judicious use of the public's resources.

Sincerely,



Charles Krautler
Director

CK:cw:riy

c: Tony Dittmeier, FTA
Emily Tait, FHWA
Joe Palladi, GDOT
Laraine Vance, CCT
Tad Leithead, Cumberland CID
Thelma Purnell, MARTA
Hon. Sam Olens, Cobb County Chairman
Hon. Shirley Franklin, City of Atlanta Mayor

