



Central Atlanta Progress
Atlanta Downtown Improvement District

6DOT / GRTA
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June 5, 2007

Northwest I-75 / I-575 Corridor Responsible Agencies
c/o Mr. Wayne Fedora, P.E.
Major Projects Engineer
Federal Highway Administration, Georgia Division
61 Forsyth Street, SW, Suite 17T100
Atlanta, GA 30303-3104

**RE: Northwest I-75 / I-575 Corridor
Alternatives Analysis (AA) / Draft Environmental Impact Statement (DEIS)
Comments for June 5 Public Hearing, Atlanta Civic Center**

Dear Mr. Fedora and Project Proponents:

Central Atlanta Progress (CAP) and the Atlanta Downtown Improvement District (ADID) are pleased to provide comments on the Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS) document for the above-referenced project.

We wish to reiterate considerations previously communicated to the Federal Highway Administration's Georgia Division in a letter to Myra Immings dated July 10, 2006 (attached). We also are very supportive of recent, positive conversations exploring advancement of Downtown's proposed Multimodal Passenger Terminal (MMPT).

As we have shared previously, we do not understand the analytical basis for the AA/DEIS's dismissal of the MMPT alternative. Although we support adding to and modifying the Arts Center Station for the BRT system in a sensitive manner, we believe that utilizing the MMPT could help mitigate negative impacts on the Arts Center Station area, catalyze redevelopment near the MARTA Five Points Station, and build a hub for future transit options. A recent conversation (May 15th) among the City of Atlanta, Georgia Department of Transportation, CAP/ADID staff, MARTA and staff from the Georgia Regional Transportation Authority (GRTA) suggests new interest in exploring the feasibility of phased implementation of the MMPT as a bus transfer facility that would allow for and not preclude the facility's function as a station for commuter and intercity rail. Given this activity, it is CAP/ADID's strong opinion that the AA/DEIS should be revised to take the MMPT alternative into account. Moreover, in-depth conversations with Downtown stakeholders, informing them of this possibility, should be included within the station evaluation process.

We are encouraged by the revived interest in the MMPT and believe that advancement of the MMPT presents the starting point for true regional transportation solutions. If you have any



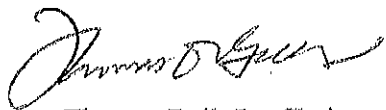
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questions regarding these comments, please do not hesitate to contact us. We appreciate your consideration.

Respectfully,



Thomas Bell, Jr., Chair
Board of Directors
Central Atlanta Progress, Inc.



Craig Jones, Chair
Board of Directors
Atlanta Downtown Improvement District, Inc.

CC: A.J. Robinson, CAP/ADID
Steven Cover, City of Atlanta
Susan Mendheim, Midtown Alliance
Joe Bankoff, Woodruff Arts Center

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Central Atlanta Progress
Atlanta Downtown Improvement District
Downtown Transportation Management Association

July 10, 2006

Mrs. Myra Immings
61 Forsyth Street SW.
Suite 17T50
Atlanta, GA 30303

RE: Northwest Corridor (I-75/I-575) HOV/BRT Project

Dear Mrs. Immings:

It has come to our attention that the Northwest Corridor (I-75/I-575) HOV/BRT Project includes a reconstruction plan of the ARTS Center MARTA station, as well as a routing plan for buses in the Midtown and Downtown communities. In light of this, I wanted to immediately convey Central Atlanta Progress' (CAP) position regarding the I-75 BRT station area planning. Specific concerns involve (1) the public involvement process, (2) the scale of the Arts Center MARTA station redevelopment, and (3) the proposed Multimodal Passenger Terminal (MMPT). We ask that you incorporate this position into the DEIS.

Public Involvement Process

CAP and the City of Atlanta have identified a need to not only get transit riders to the Central Business District (CBD), but also to get them distributed to the principal employment centers in the area. GRTA has outlined a proposal with multiple stops in the CBD, with BRT vehicles heavily utilizing Midtown and Downtown streets. The number of BRT vehicles and the routes (combined with other bus activity) will have cumulative impacts in the CBD.

As you are well aware, NEPA requires that citizens be provided with all the necessary information relating to potential environmental impacts of a proposed action before decisions are made and before actions are taken. These requirements are designed to ensure that the public may meaningfully participate in the process of agency decisions having significant impacts on the human environment. We feel our participation has been unfairly limited by the Georgia Department of Transportation/Georgia Regional Transportation Authority's (GDOT/GRTA) current course of public involvement and decision-making.

According to GDOT/GRTA's presentation held at a Cobb County community meeting, the main objective is *"To carefully fit the BRT stations into the context of the area in which they will reside, assuring successful operations while supporting the aspirations and needs of the community."* The GDOT/GRTA project team identified stations at the following locations as the subject of their station area planning program: Town Center Station, Marietta Station, Franklin Station, Terrell Mill Station and Cumberland Station. The modifications required at the Arts Center

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Station to accommodate the proposed level of BRT buses is just as significant as the development of the new stations in Cobb County.

Local stakeholders are very concerned about the negative impacts to the Arts Center Station area. Changes to the station will have enormous environmental, social, and economic consequences for the community in which it is located. As such, a more in-depth level of public involvement, similar to the Cobb County BRT Stations, is relevant.

Scale of the Arts Center MARTA Station Redevelopment and the Proposed MMPT

CAP does not understand the logic of locating all routes and stops at the Arts Center Station in its constrained urban environment, which will adversely affect numerous existing businesses or properties.

In fact, we are dismayed at the reluctance to utilize the proposed MMPT. The MMPT could help mitigate negative impacts on the Arts Center Station area, while acting as a catalyst for redevelopment in the "Gulch" and becoming a hub for future transit options.

According to the Georgia Department of Transportation's 2006 Multi-Modal Passenger Terminal (MMPT) Fact Sheet, *"The National Environmental Policy Act [NEPA] process has been completed for the MMPT. An Environmental Assessment [EA] was completed in early 1995 and a Public Hearing was held in April 1995. The Federal Transit Administration [FTA] signed a Finding of No Significant Impact [FONSI] for the EA in June 1995. GDOT submitted a Reevaluation of the EA to FTA in September 2000 that indicated the approved FONSI remained valid. On December 1, 2000 FTA issued its concurrence with the re-evaluation of the MMPT's EA and FONSI.*

In 2001 the facility plan was revisited to accommodate Georgia Regional Transportation Authority's (GRTA) "X-Press" commuter buses that were projected to bring people downtown to work. Despite the years of collaboration, GRTA decided to change their bus plans and they are not planning to use the MMPT."

The reason and value of that decision is suspect. For example, how does the MMPT analysis and report factor into the analysis of decision-making for the BRT study? If it has not, why has use of the MMPT been removed without public discussion in relation to local plans and policies? It is clear that some reasonable alternatives have already been eliminated without a detailed, NEPA-quality, discussion of 'why?'. How and why did GRTA decide to change their plans without in-depth conversations with local stakeholders?

We recommend adding and modifying the Arts Center Station for the BRT system, but not necessarily to the degree that GDOT/GRTA has proposed. Additional capacity should be absorbed by the Federally-approved MMPT. Where alternatives exist, as the project design moves forward, we expect sensitivity to local businesses and residences in order to preserve current uses and/or mitigate impacts. We would like to agree on ways to equalize the nature, scale, and impacts on the proposed Arts Center Station project.

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CAP is a strong supporter of alternative transportation options. As such, we recognize the need for supporting station facilities in order for the system to function well. From this position, CAP wants to proactively work with the project team to ensure that the best location and building design is identified and evaluated.

Sincerely,



A.J. Robinson
President

Cc:

Harold Linnekohl, GDOT
Steve Stancil, GRTA
Luz Borrero, City of Atlanta
Steven Cover, City of Atlanta
Robert Callan, FHWA