

Memorandum



DATE: August 13, 2007

TO: Mr. Wayne Fedora, P.E.
Federal Highway Administration

Mr. Darryl VanMeter, P.E.
GDOT

FROM: Ryland N. McClendon, *RNM*
AGM, Planning

Cc: Richard J. McCrillis,
GM/CEO

SUBJECT: **Alternatives Analysis/Draft Environmental Impact Statement
Northwest I-75/I-575 Corridor**

Attached are review comments submitted by the Metropolitan Atlanta Rapid Transit Authority (MARTA) on the Northwest I-75/I-575 Corridor Alternatives Analysis/Draft Environmental Impact Statement. Emphasis has been added for comments directly impacting the Authority. Your consideration of these comments will be appreciated. For additional information needed please contact me at rmcclendon@itsmarta.com or (404) 848-5100.

//Attachments

Section	Comment
1.0 (pp.1-1)	The introduction of the project indicates a predetermined selection of modes to solve the problem. If this is truly a multimodal corridor approach as advocated by USDOT, using mode generic terms would bring more attention to the problem the project is trying to solve. Suggestion: 2 nd sentence would read: The improvements are collectively referred to as the Northwest I-75/ I-575 Corridor Project and could include roadway and/or transit construction not to preclude exclusive trucking facilities and managed lane concepts for improved system effectiveness.
1.1 (pp.1-1)	From a transit perspective, excluding the I-75 portion from Downtown (or Midtown) Atlanta to I-285 needs from the project area needs more justification. Any <i>high capacity</i> transit with the intention of addressing the mobility needs in the Northwest I-75 Corridor to downtown or midtown would need a stronger, exclusive linkage to the <u>existing high capacity</u> system, instead of relying on the existing infrastructure resulting in congestion and travel time delays.
1.2 (pp.1-3)	Are the “concerns” listed in this section meant to be generalized here and specifically identified in subsequent sections (i.e., 1.3, 1.4, etc.)? Specific, quantifiable corridor issues are not integrated enough or effectively in concert with the listed concerns. Everyone has congestion, but how is congestion in this corridor any more problematic than other corridors? What is the current travel time and what should it be? What are the connectivity needs? Are they modal? Similarly, can the goals be more specific once problems are identified. If this is truly a multimodal project with the potential to use Federal Transit funds, the “Story” is not compelling in terms of the current challenges of transit choices and how this project will make transit much more viable in the spirit of “additional transportation choices or options”.
1.3.4 (pp.1-5, 1-6)	Some language appears biased to roadway expansion, which betrays the suggested multimodal thinking and approach. 4 th sentence in 4 th paragraph should read “Thus, freeway and/or <i>transit</i> capacity increasingly will need...”.
1.4 (pp.1-6)	Generally, the information is good, but the resulting conditions of this assessment of system performance are not communicated adequately whereby a comprehensive list of multimodal alternatives can be developed. Yes, there are congesting conditions now that are exacerbated in 2030 with increases in travel times and congestion duration, but specifically, <i>how does</i> and <i>how will</i> the corridor fail in terms of meeting the mobility needs of all? More importantly, are there problems that a high capacity, exclusive transit can address? This is set up to disproportionately consider each mode as separate options in the corridor with potential investments in each. The problem – a skewed consideration and evaluation of modal options favoring roadways.
1.4.1.1 (pp.1-9)	The 2005 a.m. inbound volume range is stated from 11,000 to 17,000 when the associated chart (Figure 1-4) does not show the upper range exceeding 15,000 for any of the listed interchanges.
1.4.1.3 (pp.1-12)	How troubling is a 5 minute increase in travel time given the anticipated growth? This speaks to the need for a stronger Project Purpose to detail the serious commute problems.
1.4.2 (pp.1-13)	Could there be language that suggest the travel times for a higher capacity, exclusive transit could do more than just reduce the difference in travel times between the two modes. As related to the Purpose and Need and the development of this project, it appears that transit was “capped” and never had a chance for consideration in an exclusive context.
1.4.2.3 (pp.1-15)	When discussing average transit travel time, the report should identify the transit technology/service, i.e., express bus, local bus, and or rail service. Travel time for high speed rail or light rail would not be the same as the travel time for bus service.

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1.4.3 (pp.1-16)	The 2 nd paragraph speaking to the southern terminus of the project should be strengthened to mention trip pattern information consistent with the “logical” reasons that are clearly based on existing infrastructure. Trip patterns and travel demand along with existing infrastructure and the associated constraints (which are not mentioned) have a lot to do with project definition.
1.5.1 (pp.1-17)	The timeframe of the crash data should be specified
2.3.4.9 (pp. 2-29)	The 8th paragraph implies that the proposed modifications to the Arts Center Station have been agreed to or endorsed by MARTA. MARTA is currently in discussions with the Woodruff Arts Center regarding development of the Arts Center Station as a transit oriented development project and possible symphony hall expansion. Any expansion must accommodate this reality as well as not preclude MARTA from planning other transit expansions. This is noted in section 7.6.2, but should be noted here as well. The remainder of the section implies that consideration of the MMPT as a major transfer point for GRTA (beyond the three routes indicated) is not being considered. Please reconcile this with GDOT action to develop the MMPT as a major bus transfer hub prior to the development of commuter rail. A general reference to issues related to the MMPT is included in section 7.6.4, but should be noted here as well.
2.4.2 (pp. 2-38)	Given that the HOV/TOL/TSM performs poorest as a transit option relative to the other build alternatives on the basis of transportation equity, cost/benefit, and financial feasibility (section 7.4.2), how can this reasonably continue to meet the purpose and need for this project should the other alternatives be eliminated? Please discuss.
2.4.3.2 (pp. 2-53), 2.4.4.3 (pp. 2-63), 2.4.5.2 (pp. 2-67)	These sections state that MARTA would not need additional rail cars. Please cite the source for this information or explain the assumptions on which this assertion is based.
2.5.2 (pp. 2-69)	Please explain the manner in which the HOV/TOL/TSM alternative is more expensive than the HOV/TOL/Reduced BRT Alternative given that the former does not require the capital cost of station construction.

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