

Appendix F - Comments Received during Public Comment Period

Page Left Intentionally Blank

Atlanta BeltLine DEIS Public Comments & Responses

The total of all comments received during the DEIS comment period was 33. The comments came from the following sources: (14) from the Public Hearing, (8) from the project website, (7) from Peak Democracy, (2) from MARTA email, (1) from the Project Hotline, and (1) from the Comment Form. Note that the three (3) comments received from the project email were from one individual and another individual commented twice; each comment was counted as one (1) comment each.

Each of the comments could be grouped into 13 general categories as described below.

- *Documentation Request*: Request for information or draft document.
- *Planning Process*: Comments that relate to the EIS planning process and previous or ongoing planning efforts around the Atlanta BeltLine project.
- *Environmental Justice/ Public Involvement Process*: Requests for further outreach, or comments related to types of outreach included in the planning process.
- *Agency Coordination*: Requests for ongoing and additional agency coordination.
- *Opposed to the Project*: Comments in opposition to the Atlanta BeltLine project as a whole.
- *General Support for the Project*: Comments in support for the Atlanta BeltLine and the planning efforts surrounding the project.
- *Support for a Specific Technology or Alignment*: Comments in support of LRT or SC; comments in support of specific trail and transit alignments reviewed in the Tier 1 EIS process.
- *Alternate Technology or Alignment Suggestions*: Suggestions of alternative technologies to LRT or SC, alternative alignments for transit or trail, or additional trail connections and MARTA station connections.
- *Community Impacts*: Comments from neighborhood associations, or comments about general community impacts.
- *Environmental Impacts*: Comments about the quality of the existing environment or comments concerning potential impacts of the project
- *Cost Estimates/ Funding*: Request for cost estimates and comments regarding funding sources.
- *Agency Comments*: Official comments from affected agencies. Specific content of the contents can be grouped into the other general categories.
- *No Comment*: Agency or association decided to not make an official comment.

Each comment is recorded below with details of its source, date, and general category. The Project Sponsors provided responses to each comment received,

Comment Record: 2011-01
Comment by: Johnny Wilson **Email:** centerforpp@gmail.com
Date received: 07/25/11 **Source:** dwa_beltlinestudy@bellsouth.net
Category: Documentation Request, EJ/PI Process

Comment

"I am writing to obtain a copy of the study conducted by the Federal Transit Administration (FTA), in cooperation with the Metropolitan Atlanta Rapid Transit Authority (MARTA), in partnership with Atlanta BeltLine, Inc. (ABI), that examine that role that NEPA process played in: (1) Identifying the role, function, prescription and scope of work performed by citizens in pre-planning, drafting or writing of a Tier 1 Draft Environmental Impact Statement (DEIS)

(2)Identified the role, function and scope of work performed by NEPA in ensuring citizen advocacy and planning.”

Response

Thank you for your interest in the BeltLine Corridor Environmental Study. You may find copies of the Tier 1 DEIS at <http://www.itsmarta.com/beltline-documents.aspx> and www.beltline.org.

Comment Record: 2011-02
Comment by: Not Shown **Email:** N/A
Date received: 08/12/11 **Source:** dwa_beltlinestudy@bellsouth.net
Category: Support for a Specific Technology or Alignment

Comment

“Survey Questions/Responses:

- 1) What do you think about the project in general? Fine
- 2) If you have been involved in previous BeltLine Studies, how would you describe your experience?
Fine
- 3) Do you have any concerns relative to the environmental effects of building transit and trails in the BeltLine Corridor" If so please specify.
No
- 4) What are your preferences regarding transit technology or the type of transit that should be implemented in the BeltLine Corridor? Modern Streetcar”

Response

Thank you for your responses.

Comment Record: 2011-03
Comment by: Johnny Wilson **Email:** centerforpp@gmail.com
Date received: 08/1/11 **Source:** dwa_beltlinestudy@bellsouth.net
Category: EJ/PI Process

Comment

“I want to thank you for the response to my inquiry to access those documents or resources via the electronic telecommunication vehicle (e-mail), to display the orientation or testimony of those involved with the construction or development of a “proposed plan” to address transportation land use and decision-making. While the effort is to be commendable, there is still, an enormous problem with the testimony.

The main problem is apparent and found ever-so-present in the writing of the "abstract" whereby the reader is introduced immediately to a litany of words, concepts or phrases designed to identify who is doing the business of crafting the scheme or design for the transportation plan. In fact we read "has prepared", "decisions made" or "is to improve" as cues to demonstrate the absent of the individual or the general public with specific or direct involvement in the planning, research, writing and editing of the plan.

Moreover, after a careful reading of each of the documents as listed in the response, I come away with the view that citizen participation and involvement is limited to: (1) Sitting in a room,

(2) Going to a lecture/workshop, meeting, (3) Receiving a document, (4) Being shown what has been sketched or drafted (5) Awaiting their comment on a plan after it has been written by those holding the meeting.

Now, should the question be raised that the aforementioned items (1-5) are an offense to NEPA and the Environmental Justice Acts? Is this the definition upon which we are to view "Public" and "Participation"? What does NEPA and Environmental Justice say about public participation? Let's investigate.

Public Participation Under NEPA

1. Scoping.

CEQ regulations require "scoping" following the publication of a notice of intent to prepare an EIS, but before the EIS is prepared. CEQ regulations define scoping as "an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action" (40 CFR 1501.7).

In general, scoping has three broad purposes: identifying public and agency concerns with a proposed action, defining issues and alternatives to be examined in detail, and saving time by ensuring that relevant issues are identified early and drive the analyses (see 40 CFR 1500.4 (g), 1500.5(d)). A public meeting is held during scoping, with notice of the meeting made in the Federal Register, local newspapers, and utilizing other means of announcing public meetings, depending on case-specific circumstances.

2. Public review of EISs and EAs.

As with scoping, CEQ and EPA NEPA regulations clearly specify the means by which the public is involved in reviewing draft and final EISs. EPA regulations require at least one public meeting on all draft EISs (40 CFR 6.400(c)). The meeting is generally announced in the Federal Register and in local newspapers and by other means. Regulations also provide other means of soliciting comments and information. Comments must be solicited from other appropriate federal, tribal, state, and local agencies, and from the public, specifically including a request for comments from "those persons or organizations who may be interested or affected" (40 CFR 1503.1(a) (4)).

3. Public review of RODs and FONSI.

Records of Decision on EISs must be disseminated to all those who commented. No public review is required prior to or after issuance of the ROD. Findings of No Significant Impact on EAs, in contrast, must be made available for public review before they become effective (40 CFR 6.400(d)), and this involves at least local notice and advertising. The FONSI and "attendant publication" must state that comments disagreeing with the decision may be submitted, and any such comments must be considered by EPA (40 CFR 6.400(d)).

4. Mechanisms to Enhance Participation

The public participation provision in Executive Order 12898 and its accompanying memorandum are designed to ensure that there is adequate and effective communication between federal decision makers and affected low-income communities and minority communities.

Moreover, in Section 5-5 we discover that public participation provision in Executive Order 12898m, Section 5-5 and its accompanying memorandum are designed to ensure that there is adequate and effective communication between federal decision makers and affected low income communities and minority communities. This is consistent with NEPA mandate to involve the public by

1. The public may submit recommendations to Federal agencies relating to the incorporation of environmental justice principles into Federal agency programs or policies.

2. Each Federal agency shall convey such recommendations to the Working Group. (b) Each Federal agency may, whenever practicable and appropriate, translate crucial public documents, notices, and hearings relating to human health or the environment for limited English speaking populations.

3. Each Federal agency shall work to ensure that public documents, notices, and hearings relating to human health or the environment are concise, understandable, and readily accessible to the public.

4. The Working Group shall hold public meetings, as appropriate, for the purpose of fact-finding, receiving public comments, and conducting inquiries concerning environmental justice. The Working Group shall prepare for public review a summary of the comments and recommendations discussed at the public meetings.”

Response This is a welcomed opportunity to share with you the many ways that the public has been involved in the Atlanta BeltLine Corridor Environmental Study since this project began. This will represent a brief overview of the public involvement and public decision points that are outlined in Chapter 8 and throughout the DEIS Report.

We appreciate and share your concern that this project must have at its core and throughout the process, public input. In addition to the public, which I will cover here, the project structure includes three oversight advisory committees, the Stakeholder Advisory Committee, Technical Advisory Committee and the Agency Group. The Stakeholder Advisory Committee consists of community and transit advocates, neighborhood and community representatives and community organizations. The Technical Advisory Committee consists of city and county planning, service and government organizations and regional planning and government organizations. Finally, a comprehensive list of federal, state, local, city and county organizations formed the Agency oversight committee. Each of the three committees meets at key milestones and decision points to comment, guide, and critique and to advise on the impact of the study, input from various sources and data gathered. These three groups also assist in promoting public involvement throughout the process.

Further and separate from committee meetings, the public participated in a series of meetings in late summer 2008, spring of 2009 and winter 2010 and actively engaged in crafting alignment ideas for transit and trails, potential station locations and offered feedback on environmental and other aspects of the study. These sessions resulted in key and substantial ideas, presented by the public and determined the type of and characteristics of service and preferred alignments. During these sessions, the public actually presented ideas which are the basis for the transit and trails alignments in the DEIS.

MARTA and ABI have provided several opportunities for public input throughout the study via public meetings held in each geographical section of the study area. During public meetings, participants were asked about their preferences and their feedback was passed to the technical team to incorporate into the analysis study. Public meetings are designed to be data collection sessions and are structured in most cases in small hands-on workshop style settings to ensure that input from all participants was heard. The Scoping Meetings, as called for in the regulations, was one of such series meetings held throughout the study areas.

All meetings, feedback, results and documentation are well documented in the DEIS.

Not only was the public able to participate in public meetings, MARTA and ABI sought out invitations to attend Neighborhood Planning Unit (NPU) meetings, community meetings, planning meetings, public meetings held in locations such as libraries and food courts and in transit stations. One-on-one individual briefings of organizations representing large constituents were also held. A project email was established to receive public input and an email database was created to notify the public of the meeting and opportunities to participate. Project fact sheets and newsletters were distributed at public and community locations throughout the service area.

These are just a few of the ways that MARTA and ABI structured the project from the start to ensure that the public has the opportunity to participate in the project. You will find a comprehensive list of the all of the public outreach activities provided in the DEIS. MARTA and ABI are committed to meeting the purpose and intent of the requirements of the National Environmental Policy Act and the Council on Environmental Quality. The Atlanta BeltLine Tier 1 EIS process is being implemented according to the regulations and guidance of the FTA and CEQ to assure fair and meaningful public involvement.

The DEIS is the culmination of the work that MARTA, ABI and the community have conducted for the Atlanta BeltLine transit and trails. The preliminary alignments express the public desires for transit and trails, and strive to avoid or minimize environmental concerns heard from the public participation during initial design and project development. Important to note is that while the project is in the wrap-up stage for the early phase Tier 1 analysis, Tier 2 will provide you and the public with further opportunity for public involvement in crafting the future for the Atlanta BeltLine.

Thank you for your interest and inquiry and the opportunity for us to share the many ways that the public was involved. Please be assured that at the very core of this project is public involvement.

If you have any specific questions, concerns and comments as you review the DEIS, you are invited to share your comments and let us know how we can ensure that you are fully privy to the work and approach that has been underway.

The written public comment period for the Tier 1 DEIS will extend through September 17, 2011. We were pleased to have been able to provide you with a schedule of the final set of Public Hearings and hope that you had an opportunity to participate in one of the four meetings. Nevertheless, the written comment period will provide you with an opportunity to review and comment on the DEIS. You will find a wealth of information as well as project videos on the project websites where you are encouraged to review and to have your input known and considered even at this stage of the process. It is not too late to participate in a meaningful way in this process and have an impact on revitalizing the Atlanta's community for years to come. Even at this stage of the process we are developing ways for the public to participate. An online forum has been established on the ABI website, run by Peak Democracy, regarding the DEIS for the Atlanta BeltLine transit and trails. In order to comment, you will be asked for your name and home address. This information is only used to identify statements from residents in and near Atlanta so that users know which comments are from local residents. You can choose whether or not you want to show your name on your comment. The forum link is: <http://beltline.org/BeltLineBasics/TransitTrailsandTransportation/EnvironmentallImpactStudyEIS/DraftEnvironmentallImpactStatement/tabid/4051/Default.aspx>. Also, a project video, referenced above, can be found online at <http://eis.beltline.org/Default.aspx#videos>. You can watch the full 21-minute video or just sections of it.

Comment Record: 2011-04
Comment by: Michelle Marcus **Email:** N/A
Date received: 08/1/11 **Source:** Public Hearing 1-3pm
Category: Documentation Request, Community Impacts

Comment

“Requested DEIS documentation that addressed the following question that she posed during the Q/A session: “I was wondering what feedback you had gotten from the neighborhoods in the Northwest area where the different alternatives are being decided, what meetings had occurred and what feedback you had gotten from those committees?”

Response

Northside and Westside Study Group workshops were held in April and May 2009 to discuss and identify alternative service plans, alignments and preliminary station locations in the Northwest Zone. These small group working sessions were interactive. Public workshops were held in June 2009. Input heard at these workshops included preference for frequent stations and locally oriented service, efficient connections to MARTA and other transit services, in-street as well as exclusive right-of-way operations, direct access to activity centers and major trip destinations, and neighborhood-oriented pedestrian access. Post Public Workshop meetings in the summer of 2009 yielded additional input to the alternatives development and evaluation process that reinforced the preferences heard in the workshops themselves.

The Northside and Westside Study Groups met again in Fall 2009 and had discussion sessions regarding use of freight-railroad corridors, environmental and property-related issues, operations, mode, safety, and relationship of the Atlanta BeltLine to MARTA rail service. Preferences and rationale for transit and trail alignments in the Northwest Zone varied.

Chapter 8 and Appendix E of the DEIS provide more discussion of the foregoing workshops, meetings, and their outcomes.

Three workshops were held in the Fall 2010 to focus primarily on changes to alternatives in the northwest area. A meeting was held with the TAC/Agency Committee, a second meeting with the Stakeholder Advisory Committee and the final meeting with the Northside Study Group and Public Meeting. A copy of the meeting summary was given to Ms. Marcus. Preferences and rationale for transit and trail alignments in the Northwest Zone varied. A copy of the report of these workshops is available on the project website; Chapter 8 and Appendix E of this FEIS provide more discussion of the foregoing workshops, meetings, and their outcomes.

Comment Record: 2011-05
Comment by: Johnny Wilson **Email:** centerforpp@gmail.com
Date received: 08/1/11 **Source:** dwa_beltlinestudy@bellsouth.net
Category: EJ/PI Process

Comment

“I am writing to thank you for the brief array of information that you sent explaining your position regarding the role that the term, concept, phrase "public in-put or participation" will play in conjunction with DWA Beltline activities. After a careful review of your analysis, I am struck by several matters and I pose them in the passages listed below.

For the sake of clarity, is it your understanding that:

(a) (1) The wording and language written into National Environmental Policy Act (NEPA) and Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and low Income Populations specifically defines "public input" as occurring only when an individual physically leave their home to journey to a special location to participate in a public gathering, read material being circulated, raising of the hand to pose questions and that somehow this activity in its mile form satisfies the condition of NEPA and Executive Order 12898?

(b) (2) "Public meetings...designed to be data collection sessions and are structured in most cases in small hands-on workshop style settings to ensure that input from all participants was heard" meet the terms and conditions of Section 3-3. of Executive Order 12898,entitled Research Data Collection and Analysis?.

(c) (3) Public meetings...designed to be data collection sessions and are structured in most cases in small hands-on workshop style settings to ensure that input from all participants was heard. The Scoping Meetings, as called for in the regulations, was one of such series meetings held throughout the study areas.

(d) (4) By the "public ...participate in public meetings, MARTA and sought out invitations to attend Neighborhood Planning Unit (NPU) meetings, community meetings, planning meetings, public meetings held in locations such as libraries, food courts and in transit stations", mean that in the aftermath, a policy will be crafted to reflect which interest:

(A) Stakeholders hosting the event

(B) Those stakeholders who pose an environmental policy question based on their understanding of NEPA and Environmental Justice Act12898?

(e) (5) After "One-on-one individual briefings of organizations representing large constituents were held"... and after" the public participated/...engaged in crafting alignment ideas for transit and trails", should the public participant requirement:

(1) (a) Serve as both an advisor and an overseer of DWA BeltLine activities given that you are asking the citizens of the state of Georgia to vote to give you millions of dollars to support your project activities?

(2) (b) Determine specific responsibilities for defining their role given that you are asking the public to give, make available, funds on the 2012 ballot to support DWA Beltline activities?

(3) (c) Should those in attendance at the meetings along with property owners being asked to give up, make available funds to support DWA BeltLine activities insist upon the hiring of a Public Participation Specialist or Coordinator that will have the responsibilities for carrying out those ideas, suggestions articulated by the general public regarding transportation service deliver?"

Response

(a) No, it is not our understanding that NEPA, implementing CEQ regulations and/or E.O. 12898 defines "public input" as described. The above-mentioned statutory and policy framework directs agencies and sponsors of federal actions to strive for public involvement, particularly fair and meaningful public participation of low-income, minority and indigenous populations. The

precise manner in which public involvement will be sought is guided by the language of NEPA, CEQ regulations (40 C.F.R. § 1506.6) and guidance provided by CEQ or EPA on NEPA regulations or environmental justice considerations (e.g., EPA's Action Development Process, Interim Guidance on Considering Environmental Justice During the Development of an Action, July 2010) .

(b) Section 3-4 of E.O. 12898 provides that: "(a) Environmental human health research, whenever practicable and appropriate, shall include diverse segments of the population in epidemiological and clinical studies, including segments at high risk from environmental hazards, such as minority populations, low-income populations and workers who may be exposed to substantial environmental hazards. (b) Environmental human health analyses, whenever practicable and appropriate, shall identify multiple and cumulative exposures. (c) Federal agencies shall provide minority populations and low-income populations the opportunity to comment on the development and design of research strategies. The "public meetings" described above were not designed to satisfy the terms and conditions of E.O. 12898 § 3-3. Instead, Section 3.4.3 of the Tier 1 DEIS presents locations of minority and low-income populations in the study area using readily available demographic data and CEQ guidance for identifying such populations. This information enabled public involvement activities to recognize and strive to engage all populations. During Tier 2 analysis of the Atlanta BeltLine, further data collection and engagement with all potentially affected populations will be undertaken to avoid or minimize effects and prescribe effective mitigation strategies as needed.

(c and d) A CEQ Memorandum regarding guidance on NEPA regulations explains that, "[t]he CEQ regulations direct federal agencies which have made a decision to engage in a public scoping process. Public hearings or meetings, although often held, are not required; instead the manner in which public input will be sought is left to the discretion of the agency." 48 Fed. Reg. 34,263 (19830029). In this instance, public involvement during the Tier 1 EIS process included diverse means of two-way communication, including project-specific scoping meetings, work sessions, workshops, meetings, public hearings, newsletters, web-based communications, and other tools identified in Chapter 8 of the Tier 1 DEIS. In addition, the project sponsors made themselves and their consultants available to entities interested in having them attend or participate in events or meetings sponsored by those entities. The purposes of diverse communications are to strive to give as many people in the community an opportunity to be involved in learning about the project, shaping the project, and making their interests, concerns and preferences known.

(e) Atlanta BeltLine Response: Over the last five years as a part of Atlanta BeltLine's legislatively established Community Engagement Framework, the public has embraced and owned their role as a stakeholder in the process of planning and implementing the Atlanta BeltLine whether it is providing input for determining alignment for transit and trails or for land use and park master planning efforts. This Framework consists of six components that include:

1. A Tax Allocation District Advisory Committee that primarily makes recommendations on projects funded from bond proceeds;
2. A BeltLine Affordable Housing Advisory Board that primarily makes recommendations on the goals and policies related to the use of the BeltLine Affordable Housing Trust Fund;

3. A Community Representative on the Atlanta BeltLine Board of Directors that holds the same term, duties and responsibilities equal to every other board member;
4. A Community Engagement Advocate that informs the community on current Atlanta BeltLine issues and ensures active and meaningful participation in Atlanta BeltLine matters;
5. A Formal Community Reporting that is convened for the public quarterly to report the status of the most significant aspects of Atlanta BeltLine's progress; and
6. A Community Participation Framework that ensures that Neighborhood Planning Units, neighborhood groups, concerned organizations and individuals have the opportunity to have direct input on Atlanta BeltLine planning, design, and implementation within geographically defined Study Groups.

In addition, as the community needs of the Atlanta BeltLine have grown, we expanded the Framework to include a forum called Citywide Conversations that provides community education and dialogue when new concepts and ideas related to the planning, design and implementation of the Atlanta BeltLine are introduced. With an understanding of Atlanta BeltLine's comprehensive Community Engagement Framework above, we provide the following answers to the sub-questions below:

- a) Public participants can expect to serve as advisors to Atlanta BeltLine activities because we currently have members of the community serving on both of our advisory boards as well as our Board of Directors, shaping policy and project outcomes over the last five years (see components 1-3 above).
- b) Public participants define their role as a standard part of any Atlanta BeltLine participation process from the beginning, typically by shaping project goals, determining guiding principles, providing feedback and validating final outcomes within our Study Groups (see component 6 above).
- c) Public participants have the support of adopted legislation that requires Atlanta BeltLine to have a Community Engagement Advocate to represent and protect the ideas and interests identified by the public in this planning process for transportation delivery and all planning processes (see component 4 above).

Comment Record: 2011-06
Comment by: Ted Brodek **Email:** N/A
Date received: 08/16/11 **Source:** Public Hearing 1-3pm
Category: Opposed to the Project, EJ/PI Process, Cost/Estimates/ Funding

Comment

"Thank you for allowing public comment. My comments are more general than technical.
(a) Because generally I am opposed to the entire beltline and have been for quite a while. I spoke at one of these events before in the Candler Park Lake area.

(b) Basically, I think that the planning of this whole concept is just another step in systematic Atlanta basic racist planning process because again it's favoring an in-town gentrification program as opposed to looking at what people really need to be able to get from and back to jobs. I know that Atlanta beltline is not responsible for the TIA concept, and the East Line for MARTA, but MARTA is a partner in this. This is basically geared towards where people are placing their emphasis. My thinking is that the beltline should be scrapped.

(c) Six hundred million dollars from the pocket of taxpayers and an aggressive tax is a totally wrong approach to really developing proper transit. I'm certainly in favor of mass transit, but at this point, I will urge everyone to vote against that tax. I think there will be a lot of opposition to it.

(d) The second point I want to make is MARTA could ask Emory to pay for the Emory extension from Lindbergh to Emory. Emory has a huge endowment. It's Coca-Cola. It's big money. They could pay that \$600 million, \$700 million without even a hiccup rather than expecting tax payers to do something. Thank you."

Response

(a, c and d) Thank you for letting us know your preferences regarding the BeltLine, and your suggestions.

(b) One of the objectives of the ARC's Plan 2040 Regional Transportation Plan, of which the transportation component of the Atlanta BeltLine is a part, is to "Increase mobility options for people and goods." To achieve this regional objective, transit projects are proposed and planned for in areas that are currently underserved by public transit. Atlanta BeltLine would help the city achieve this objective given its circulator type service through the many diverse communities in the four zones. Other projects assisting in achieving this objective in the City of Atlanta include the Peachtree Streetcar, which will connect the King Center to the Centennial Olympic Park; the Clifton Corridor connecting Lindbergh MARTA Station to the Avondale MARTA station; high capacity rail service from DeKalb to Downtown Atlanta; and high capacity transit service along SR 400 from the North Springs MARTA Station to Windward Parkway. An extensive public involvement process has been or will be implemented as part of the project development process.

Section 3.2.2.2 of the Tier 1 DEIS acknowledged the risk of escalating home values associated with the larger Atlanta BeltLine redevelopment project, of which the transportation components assessed in this Tier 1 EIS are a part. Recognizing this vulnerability, the TAD reserves 15 percent of its bond fund for use in creating affordable housing around the Atlanta BeltLine. Neighborhood land use and zoning activities are the purview of the City, which strives for community preservation while planning for positive economic development.

Comment Record:	2011-07	
Comment by:	Angel Proventud	Email: N/A
Date received:	08/16/11	Source: Public Hearing 1-3pm
Category:	Environmental Impacts	

Comment

"I wanted to comment, I am actually a freight train conductor in the CSX corridor. The esthetics of that corridor are amazingly beautiful. There's waterfalls over the creek system which of course has an impact. There's also a lot of space back there, so with come creative construction

it could be really beautiful and there's enough space. And instead of having a highway and rail corridor to look around, it could become this nice wooded area between Piedmont Hospital and Lindberg. So that would be part of that comment. Also, on the trail, running through that area would be a great major environmental kind of experience for the Atlanta resident to have again, versus the connector and the Norfolk Southern. I don't speak for CSX as a spokesperson or anything, but it's just my personal choice on the matter. Thank you.”

Response

Thank you for indicating your preference for a CSX corridor alternative; we concur that the natural resources in that corridor could be visual and experiential benefits for Atlanta BeltLine users.

Comment Record: 2011-08
Comment by: Kristy Gillmann **Email:** N/A
Date received: 08/16/11 **Source:** Public Hearing 1-3pm
Category: Community Impacts

Comment

“I am president of The Peachtree Hills Civic Association and I want to commend the beltline organization for where you guys have come from over the last couple of years. We were heavily involved in the Peachtree Creek situation, watching that very carefully because the area is that we've been asking questions about is the area that Angel speaks of. We are very concerned about the Peachtree Creek area. So my comment is really to be very very judicious and very very sensitive to the neighborhoods that impacts, with details when the time comes. I think a lot of things were handled poorly in the past and I am very hopeful and encouraged that moving forward there will be a lot more community and personal involvement because we do live there. You guys look at a map isn't the same thing as walking there, and having your kids play in it. So, please keep that, especially when you are literally in people's backyards, it makes such a difference. Thank you.”

Response

Thank you for acknowledging the diligent efforts of the project sponsors to seek, hear, and consider stakeholder and community opinions, input in crafting the alternatives, and concerns. We intend to continue this effort as the project advances.

Comment Record: 2011-09
Comment by: Mike Dobbins **Email:** N/A
Date received: 08/16/11 **Source:** Public Hearing 6-8 pm
Category: Planning Process, Community Impacts

Comment

“I have really several comments about the process.

(a) It's interesting to me, for example, that 10.9 million dollars and three and half years later we don't really have any more specificity about alignment than we had actually at the time of the first feasibility study that Econ (phonetic) did whenever back in the day. So from the EIS point of view it seems to me that it's extremely important to have a timeline when the premises on which this process was based might happen. I don't have a timeline and we don't know what kind of developments are going to happen when it gets to actually create a demand for transit ridership.

(b) My second comment or question is the whole issue of connectivity, which, again, gets involved in the time of travel. So I don't know whether you guys have done any estimate on how long it would take to get to where most of the people are trying to get, which is downtown, midtown, or Buckhead using a Beltline that goes around those areas that doesn't get you to them and requires a transfer. And, of course, there will be headways on both the Beltline and its travel speed and the wait time at MARTA for other systems and travel time. So it seems to me it's really important to have some understanding of that. The whole idea of ridership projection, I think we generally know that the heaviest concentrations of jobs, of housing, of events, of universities, of activities and cultural events, occur downtown and midtown. So I would ask all of us to say, well, would I take something that goes around those to get to them? And these are premise kinds of issues.

(c) Then there's the issue of priority. If we have needs for transit, then it seems like we ought to have all of those, what Concept Three suggested, which one would actually meet the most need now? And I'm not sure we would come up with a Beltline.

(d) One thing that we haven't discussed tonight, but the Beltline and the transportation round table are actually considering, what people in rooms like this six, seven years suggested, we need to get from the east side to the west side corridor of the city. The current plan for the Beltline is actually to begin to do that, to actually carry lines up North Avenue or 10th Street, whatever, which actually responds to a need that was identified repeatedly by a Beltline transit feasibility panel several years ago, six years ago. So that's a good step that we're actually beginning to consider a transit connectivity that gets people to where they want to go.

(e) The issue of neighborhoods like Brookwood Hills, and Loring Park, and so on, it's not at all clear -- one minute to go -- it's not at all clear that this project was generated from the point of view of conserving, enhancing, and strengthening existing neighborhoods. It sort of landed on them and now they're reacting to it all around the Let's see, I think that will about do it. I think it's interesting the comment about whether there was an earlier line that they had going all the way to Moreland and then back around again. I remember that one. Now we're talking about a bridge across I-20 and Glenwood Park and Bill Kennedy Way.

(f) So just bringing some specificity, some modification, some estimates of cost, some estimate of when the transit part of this thing is actually likely to occur would be very helpful for all of us, and it seems like seven years on we ought to have some idea, some notion, so we have some way of evaluating whether this thing is, to pun a little bit, on track or not, and whether it really meets the travel needs in this region or in the city at the present time. Thank you."

Response

(a) Considerable conceptual engineering work has been undertaken during the Tier 1 DEIS to develop feasible potential alignments for the Atlanta BeltLine transit and trails. During this time, refinements were made in many geographic areas to assure that the typical section of the alignments could be built on, alongside, over, under, or around existing roadways, railroads, utilities, and land uses. This work resulted in the multiple alternative alignments of the single BeltLine concept that was the culmination of MARTA's previous 2007 *Detailed Screening Analysis*.

The Tier 1 EIS process will conclude in 2012 with a preferred alignment for transit and trails. At that point, the project sponsors can proceed with the detailed Tier 2 analysis involving

engineering and environmental analyses, supported by continued public and agency involvement.

(b) The Atlanta BeltLine would serve as one component of Atlanta's transportation network. Its utility is that it would provide enhanced transit service to activity centers, TADs, neighborhoods, and underserved areas; it would link to existing MARTA heavy rail and bus networks. Existing MARTA heavy rail plays its part by providing the premium, highest capacity service to more dense population and employment centers such as downtown, midtown and Buckhead. An effective transit network relies upon the use of different transportation options and routes, each tailored to best serve a community's character and travel patterns. Transportation options will be chosen by the individual traveler according to their origin/destination points, trip purpose, and other factors,

(c) Concept 3 focuses on overall transportation needs planning in the Atlanta region. Implementation occurs at the individual project level as sponsor interest and funding allow. The Atlanta BeltLine transportation components have been in the active planning stages by the project sponsors for approximately eight years. At the same time, substantial land use planning activity has been underway by the City. These activities combined with federal funding have set the Atlanta BeltLine project in motion, in some cases ahead of other Concept 3 projects.

(d) The Atlanta BeltLine is one of a number of transportation projects that will help people in the City of Atlanta get where they want and need to go. It is intended to respond to the need for better intercommunity connections among the four zones in the study area. However, as with any individual project, the Atlanta BeltLine cannot resolve all transportation issues in Atlanta. Other projects, such as those in Concept 3 are intended to collectively with Atlanta BeltLine provide improved mobility and a variety of transportation options.

(e) In accordance with project goals, the project sponsors have and will continue to strive to preserve the communities through or along which the Atlanta BeltLine would pass, by avoiding or minimizing potential impacts, supporting neighborhood cohesion, mobility and access.

(f) The preliminary capital cost of the Atlanta BeltLine transit is estimated to be approximately between \$1.3 and \$1.6 billion for streetcar, and between \$100 and \$130 million for trails. The expected date of the first phase of transit implementation is 2016.

Comment Record: 2011-10
Comment by: Marcus Sharpe **Email:** N/A
Date received: 08/16/11 **Source:** Public Hearing 6-8 pm
Category: Alternate Technology or Alignment Suggestion

Comment

"Good evening, everybody. I wanted to say my main concern is the loop. So there are about fifty stations, I believe, fifty, fifty-five stations, and with the stations, with the fifty stations the streetcar does make sense because it's very close. But my concern would be Atlanta is a very populated city. It's about 5.6 million people. It's going to grow, and I think that the light rail, which I know that is referred to as the streetcar, the light rail actually might benefit in the longer run, although there are some, you know, with light rails, rights of ways, and things of that sort. But in considering light rails, Seattle is actually considering something I know it seems like a light, light rail. It's called Fast Streetcar. That might be helpful to look at that technology as well. And I'm trying to think of what else I had. Also, if they can, I think that maybe ten stations should be cut.

I think fifty is over kill. I know everybody wants everything to be accessible, but it has to be efficient. I don't know what the ridership projection is. If the ridership projection is high, which I think it will, I think the demand will be there, then that's the reason why I think light rail or something that's a little more frequent than the streetcar is more important. And I do feel -- I've spoken to Mr. Dunning about it briefly, and I know the decision has already been made, but there are some technologies that are coming in the next few years that could fill in the gaps if they decide to cut down on stations. I don't know if anybody has heard of PRT, but I think it will be a technology sky train, which I had talked to my friends over at -- they're working with NASA right now -- and they're building the first test track, so I think technology, sort of as a sky train, or PRT, could fill in the gaps in the future and integrate with the Atlanta Beltline. So I urge the planners to really consider a high capacity light rail or fast streetcar to get people around Atlanta quicker. Thank you.”

Response

We thank you for your thoughts on technology and ridership. The number of proposed Atlanta BeltLine stations ranges from 46 to 55 stations depending on the alignment alternative selected. As a result of various BeltLine public outreach processes, public input was received regarding potential locations and the quantity of stations desired for the BeltLine. The quantity and locations of stations reflect desires for the Atlanta BeltLine to operate as a neighborhood circulator, while also balancing the need to optimize travel times. As the project advances more detailed analyses will refine station locations and the operating plan. The operating plan defines transit operating characteristics such as headways, station stopping patterns, and hours of service.

Regarding other transit modes such as Fast Streetcar in Seattle, Skytrain, and PRT, our alternatives evaluation as well as the preceding 2007 Alternatives Screening Report considered numerous potential modes for the Atlanta BeltLine. In the Tier 1 DEIS, Modern Streetcar and LRT were advanced as they are the best performing modes. In Tier 2 analysis, the performance of various vehicles within the preferred mode as well as operation plans will be examined to optimize Atlanta BeltLine operations.

Comment Record:	2011-11	
Comment by:	Jonathan Miller	Email: N/A
Date received:	08/16/11	Source: Public Hearing 6-8 pm
Category:	Community Impacts	

Comment

“I am a resident of Inman Park. My house is about a quarter of a block from the Hulsey Yards. So as I've been following this project for five, seven, six, eight -- I don't even remember how many years -- I've always thought that it's going to be very difficult to get across DeKalb Avenue. I still think it's a problem. I don't know how it's going to be done, but I can't wait for it to be done. This is the coolest thing I can think of to happen to Atlanta. And I hoped when I came tonight there would be a few more specifics about my little section of the Beltline. I understand that it just doesn't happen that quickly. One thing I did learn tonight from the video was that we need a facility. I would suggest, and this is just off the top of my head, that maybe Hulsey Yards could be home to that facility. It kind of goes with my general comment that I believe my neighborhood, like Inman Park, Reynoldstown, and Cabbagetown, I think my neighbors can't wait for this to happen. We don't know how it's going to work, but we want it to work and we want it to work in our neighborhood. Thank you.”

Response

Thank you for letting us know you support the Atlanta BeltLine. The BeltLine will need a facility to store and maintain the transit vehicle fleet. The Hulsey yard site is an attractive location for the Atlanta BeltLine facility; however this site is currently used by the CSX railroad as an active intermodal yard facility. Use of such a facility for the Atlanta BeltLine is potentially possible, but will require negotiation with and agreement from CSX. Look forward to more opportunities for community involvement in crafting the design of the Atlanta BeltLine in the future Tier 2 analysis.

Comment Record: 2011-12
Comment by: Cary Aiken **Email:** N/A
Date received: 08/16/11 **Source:** Public Hearing 6-8 pm
Category: Community Impacts, Support for a Specific Technology or Alignment

Comment

"I've been very involved in the Beltline from its inception, attending the meetings at city council that created the tax allocation district, and subsequent to that I've served on the study groups, and I've attended the TDAC meetings, and many of the corridor meetings, and public hearings, such as this, throughout the process, including the original transportation planning that brought us to this point and the draft environmental impact statement.

(a) My preference for the mode of transportation would be the streetcar for the following reasons: One, would be the least impact on the permeability between neighborhoods, so that it would not be like the current MARTA systems that sort of divides neighborhoods, because of the tracks and because of the overbuilt nature of the stations. I thought the gentleman who spoke tonight about the vast streetcar technology that's coming on was very salient to this and had I would certainly encourage looking at that as an alternative. I think it needs to be fun, because precisely because as was mentioned also this evening, the destinations are not really the major destinations that people have, such as the art center, or Emory University where the need is to go east west, but going around the city in sort of an indirect way. If this is not fun, then it's going to lose a major component, which I think will attract tourists and recreational users in particular, since it connects many parks, as opposed to business or cultural institutions.

(b) For the alternatives, I would prefer transit on the west side, the A and B, the Howell Mill junction, because it had less taking, in terms of properties, and was more in the railroad corridor.

(c) And along those same lines, I think the trail alternative for Howell junction would be my preference.

(d) As far as environmental impacts in my neighborhood, my area, which is in the northeast, I would encourage the Beltline to continue with its original idea of keeping the open space adjacent to the Park Tavern at the corner of 10th and Monroe, and not to develop that into a ten story hotel, as was proposed by the Beltline in our area, in the sub-area six. The negative impact that would be occurred should that property at that 10th and Monroe changed in its zoning category, and also some small parcels that are currently R-4, if those are changed to commercial then that will have a negative impact on the single family neighborhood, which is adjacent to the Beltline there at that intersection. And there have been people, one person in particular, has purchased many parcels there as an attempt to aggregate those and then turn those into commercial. The Beltline would give them very good grounds for that change, which

would have a negative impact. And one of the primary tenets of the Beltline is to preserve single family neighborhoods, so I would encourage the Beltline in general against that, as well as making a large impact with putting a terminal there, that that might even be moved just to the other side of Monroe where it's going to be a higher density, rather than so much right in the park land. I appreciate this opportunity to make a comment. Thank you.”

Response

(a, b and c) Thank you for letting us know your preference for SC as well as transit and trail alternatives.

(d) We appreciate your land use concerns and encourage you to voice them to the City who is leading land use and zoning planning This Tier 1 DEIS evaluates the potential impacts of the Atlanta BeltLine transit and trails project. The scope of this Tier 1 DEIS does not propose or legislate land-use or zoning changes. Atlanta City government has the responsibility of implementing the Zoning Ordinance, Comprehensive Development Plan, and future land use map.

Comment Record: 2011-13
Comment by: John Guest **Email:** N/A
Date received: 08/16/11 **Source:** Public Hearing 6-8 pm
Category: Community Impacts, Supports Specific Technology or Alignment

Comment

(a) “I'm a native Atlantan and I live on 26th Street in the old Brookwood neighborhood. And we have been struggling with this city for years, not just transportation. This Beltline has created some possible benefits down the trail, but some huge potential to destroy our neighborhoods. And it's not in the way the goals and the objectives are written, are structured. It's the way the city implements the use of the SAP power that they're given under special administrative permits to administer the way things happen. We, in our little eighty-four house neighborhood, have been a mixed neighborhood, from the standpoint of having some RG-3 along with our 4 zoning and individual houses, along with some apartments and condos. But when the Beltline came along, the Beltline reaches into our neighborhood half way and comes to the north side of 25th Street. So because anything built on the north side of 25th Street falls within the realm of the SAP it doesn't go for variances. The NPU has no say in it, and, as a result, the first permit multifamily housing in the Beltline happened to be in our area. And what the city did is they cobbled together the worst, to us, of normal zoning and Beltline requirements to create new condos or the opportunity for new condos that would be within ten feet of the street, whereas, everything else had a forty foot set back. It required the superwide sidewalks where we had a small, four foot neighborhood sidewalk. It was designed to create that sort of environment in an urban place like Peachtree Street. But in a single family and small community neighborhood it destroys the character, and we were unable to get the Beltline or the City of Atlanta to make the zoning fit the neighborhood, which is one of the goals stated in the Beltline ordinance, is that they try to maintain the character of neighborhoods. So here they were on the first try destroying it. The economy came to our salvation in that the fellow couldn't afford to build it. But that's not to say, since it's already passed, the approval of this, that he could sell it to somebody else who can afford to build it in the future. So, for one, I want to get the Beltline to stop crushing, or have the potential for crushing, individual and historic neighborhoods.

(b) Secondly, the idea that the federal government has proposed and the Beltline is looking at of putting the Beltline through the railroad gulch, as opposed to putting it north of Piedmont Hospital, down through Bennett Street and around there, makes no sense, particularly when you have to engage Deering Road in the equation. Deering Road is a bottleneck now. They will

have to condemn apartments and they will create more of a mess than we have now at Deering Road and Peachtree. This is just unconscionable that they would consider such a move, particularly if they went to the trouble to do an environmental impact study they would be smart enough to see that. But, further, to put a streetcar down Peachtree Street, which is not part of the Beltline, but is part of the midtown mile affect. It's all blended into this. I have trouble with that because I have ridden streetcars down Peachtree Street. It was an experience I would not like to have to repeat in this life. It was all that was available at the time. You know, we've worked long and hard to get our vista going down Peachtree Street to be a modern urban community, to bury the power lines, to get things underground. With a streetcar they're looking at putting wires overhead and ruining the vista again. The tracks and rail and road are a problem for traffic, not to mention streetcars. So those are the two elements of this all coming together right where I live that I would really like to see the city take another look at and find a better solution.

(c) I do hope, and I'm sorry I did not get to see the presentation, but it was my understanding or my hope, that tonight they would be presenting the fact that they finally convinced the federal government that the original track for the Beltline was the preferred track and that's the one that would work the best. From what I've heard from my friends, they are still fully considering putting it through the railroad gulch and down by the Amtrak station, and it will not work. Running streetcars up Deering won't work. Running them across the street into the parking lot of the stores and through the – I don't know what they'll do with the condominiums on the other side they will have to cut through. I guess they'll condemn them. But it's just a very shortsighted route with none of the amenities that were designed into the TAD overlay district. And, in fact, if they use that route the TAD -- Our mayor at the time pushed very hard to get the TAD approved, the tax allocation district, for the Beltline. If they succeed in moving the route to the southern most route, the Beltline will physically be outside the TAD, outside the tax allocation district, for the Beltline. That makes absolutely no sense. So you'll have all of this development, and if taxes changed on this area north of us and north of the allocated area for the BeltLine. And that's about my comments. I'm sorry I rambled. That's it.”

Response

(a) See response to Comment 2011-12(b).

(b) Thank you for letting us know your concerns regarding the alignment alternatives. In the F-Atlantic Station LRT/SC Alternatives, the Atlanta BeltLine would be along Deering Road east of Mecalain Street to Peachtree Street. The existing curb line would likely be maintained; impacts to apartments or other structures along Deering Road would be unlikely. Proposed SC or LRT operation along Deering Road would typically resemble that of a bus in terms of vehicle size, and frequency of service. During Tier 2 analysis, detailed analysis will more closely analyze potential traffic impacts along Deering Road.

Regarding the transit power source and preservation of existing views, the Atlanta BeltLine would cross Peachtree Street and not travel along it. Consequently, visual changes will be minimized. Streetcar vehicles typically operate with power supply from a single, thin overhead wire, which is a proven and reliable method of power supply. The project sponsors are monitoring the development of alternative power supply technologies that engage wireless power output; at present none of these technologies is proven to be reliable for transit use. During Tier 2 analysis, further consideration of the type and configuration of power supply will be considered.

(c) Thank you for letting us know your preferences. The Tier 1 DEIS indicates the performance of each transit alignment alternative in terms of its ability to provide service within TAD areas

(Table 2-2). Tier 1 DEIS identified the D-Marietta Boulevard LRT/SC Alternatives as the best performing transit alternative and not the F – Atlantic Station LRT/SC Alternatives; it is not a preferred alternative in that document.

Comment Record: 2011-14
Comment by: Steve Williams **Email:** N/A
Date received: 08/18/11 **Source:** Public Hearing 1-3 pm
Category: General Support for Project, Support for a Specific Technology or Alignment

Comment

"I live in Southwest Atlanta. I have a couple comments. One is, as I mentioned earlier, (a) I would like to see vendor meetings and vendor support to bringing more local business because I think that will help more employment at the local level.

(b) I would like to see if MARTA could consider maybe putting a maintenance facility on the south side because there's a lot of inexpensive land available and you could bring some jobs there as well.

(c) And also I would like to see some work done under the Lee Street Bridge to make that little part more accessible. I think the rest of the trail is pretty good.

(d) And I support the streetcars for the transportation."

Response

(a) Please see the response to Comment 16.

(b) The project sponsors will consider and evaluate potential locations for a maintenance facility during Tier 2 analysis. In addition to spatial requirements and operational needs, land availability, zoning and potential for localized job creation will be considered.

(c) The Atlanta BeltLine trail would use the abandoned railroad corridor under Lee Street, Murphy Avenue, the MARTA rail line, and freight railroad tracks. Access through this area is currently provided through a tunnel structure designed for freight trains; it is potentially not suitable for pedestrian use. However, as it is a goal of the Atlanta BeltLine to improve access in and around the corridor, future Tier 2 analysis will study this location more closely.

(d) Thank you for letting us know your preference for SC.

Comment Record: 2011-15
Comment by: James Morgan **Email:** N/A
Date received: 08/18/11 **Source:** Public Hearing 1-3 pm
Category: Community Impacts, EJ/ PI Process

Comment

"I'm a resident here and my comment is mainly for the youth in my community and the community as well that being as though they don't have a voice or they're not even aware of things that go on around them that there be an outreach for some of them to be able to participate in this great opportunity here and gain knowledge of employment and things of that nature. That's the only main comment I had for that. I believe in high school the younger people should start being able to get involved with things of this nature for their future as well. And mainly that's what I'm commenting about. Keep in mind and be conscious of the youth in our community to be involved with these type of projects so that they have something positive to give in their lives instead of negative things and ignorance and crime and things of that nature.

I'm quite sure many of them would love if someone went out towards them and reached out to them and, you know, nurtured them in to this type of environment where we have a more better, safer society and community to live in as well. Thank you."

Response

The project sponsors have strived during the Tier 1 DEIS to provide opportunities for as many people to be involved in developing the Atlanta BeltLine as possible. During future Tier 2 analysis, this effort will be continued and will consider ways to involve youth to give them and the community a greater sense of project ownership.

Comment Record: 2011-16
Comment by: Wendy Brown **Email:** N/A
Date received: 08/18/11 **Source:** Public Hearing 6-8 pm
Category: Community Impacts

Comment

"I'm very, very, interested in what goes on in the Atlanta community. My thing is to eradicate homelessness and that's why I feel if this is to impact the economy and we have a lot of homelessness and joblessness here in Atlanta, this is a project that's going to need a lot of money to run this project, but you also have a lot of ability for jobs on many different levels and I feel there should be a mandate for whatever area it is in that within a certain parameter of that particular corridor that an x-amount of people from that neighborhood must be employed, paid employees of whatever is going on. If it's supposed to be so much for the community then let's get the community literally involved in it. I think there should be a mandate that has no holes in it that has to be met. Thank you."

Response

ABI has a program in place which was mandated by the city. It is a jobs training program in which we work with the Atlanta Workforce Development Agency to train people living in the Atlanta BeltLine neighborhoods, and give them the skills that would allow them to have jobs working on constructing the Atlanta BeltLine and/or working on the other construction projects. ABI also has, in many projects that we fund through the Atlanta BeltLine Tax Allocation District, a First Source Jobs Policy, which requires our contractors to make efforts to reach out and try to hire folks from the community when they're bringing people on to do the projects.

Comment Record: 2011-17
Comment by: Anthony Jewell **Email:** N/A
Date received: 08/18/11 **Source:** Public Hearing 6-8 pm
Category: Support for a Specific Technology or Alignment

Comment

(a) "I'm actually a student of AUC, Atlanta resident, born and raised, but my input in on the BeltLine project. I believe it's a very good alternative, a great project to get something like this in the Atlanta area. I've been looking for something like this since I was little riding on the Marta system myself,

(b) but my comment mainly pertains to, I believe, the Northeast Corridor that's being -- Northwest. Okay. I'm sorry. Personally, I believe the best alternative for that would probably be (no answer given), even though it may be a little bit more noisy, it may be a little less cost efficient, but instead of street cars, maybe a little light rail because the main thing I'm thinking about is running along Piedmont Hospital, maybe Atlantic Station as well, so maybe a little bit

too sluggish especially for, like, the population and also the congestion of traffic that goes throughout those major points in that travel area so a little bit more speed. And also capacity, that's another thing that I think about along that area down there in that region so I believe the light rail surface streetcar may be a good alternative even if you have to negotiate a little bit more. I know there's are active rail lines based on the freight that runs, but I mean if that doesn't work out, the streetcars work well too, but that's how I look at it.”

Response

Thank you for letting us know your preferences for mode and alignment alternatives.

Comment Record: 2011-18
Comment by: Julia Hood **Email:** N/A
Date received: 08/18/11 **Source:** Public Hearing 6-8 pm
Category: Support for a Specific Technology or Alignment

Comment:

“I haven't read the document or anything so this is just when I look at the map in the Northwest it seems that the Norfolk Southern Rail you'd be able to pick up the Tech students and it seems like you would have a young group that's perhaps more likely to be using transit than the folks coming in from Perimeter, folks coming in for four years that don't want to buy a car when they don't need a car and they don't live in Atlanta or they're coming in for something else. Anyhow, you all were probably already planning to do this, but to have pull cords. Unlike MARTA where the train stops at every single station, if you have 50 stations, if there's no one to drop off or pick up to have a mechanism in place so you're not stopping 50 times on the line. That's it.”

Response

Thank you for letting us know your alignment alternative preference. During Tier 2 analysis station and operating plan details will be developed in consultation with the public. At that time, the utility of on-demand stop service within the study area will be considered.

Comment Record: 2011-19
Comment by: Paul Jones **Email:** N/A
Date received: 09/07/11 **Source:** Project Hotline
Category: Cost Estimates/ Funding

Comment

(a) Message from the BeltLine Hotline from Wednesday, September 7, 2:04 pm:
Paul Jones, 404-378-6481, has three questions concerning the BeltLine:

1. What is the cost for ROW needs?
2. DEIS (2 questions – no specifics left)

(b) During a follow-up telephone conversation with Mr. Jones on 9/19/2011, he clarified his request for information as follows:

1. Requested a hard copy of the DEIS document.
2. What is the estimated cost of ROW for the entire project or by phase?

Response

(a) Mr. Jones was directed to the East Atlanta Library Branch to view a copy of the DEIS.

(b) The Tier 1 DEIS contains a preliminary and highly conceptual assessment of right-of-way (ROW) needs for the Atlanta BeltLine (Chapter 3.2). The assessment determined the land area

and quantity of structures located within the limits of the typical sections of the conceptual Atlanta BeltLine alignments. Preliminary ROW cost for the Atlanta BeltLine's best performing alignment (CSX Marietta Boulevard Alternative) is approximately \$64.5 million. This sum includes both the transit and trail components; it is subject to refinement during future phases of the project as design advances. The preliminary ROW cost does not include allowances for the purchase or use of privately owned railroad ROW; further negotiation with the railroads would be required to determine this cost in a future phase of the project.

Comment Record: 2011-20
Comment by: Jim Stokes **Email:** jim.stokes@alston.com
Date received: 08/18/11 **Source:** dwa_beltlinestudy@bellsouth.net
Category: Community Impacts

Comment

On behalf of the Brookwood Hills Community Club (BWH), I am submitting the following comments on the Tier 1 Draft Environmental Impact Statement. BWH has continuously been a strong supporter of the BeltLine and believes that it is very important to the future of Atlanta. Our comments relate to those portions of the Draft EIS that may impact BWH.

With respect to the trail alternatives shown on page 3 of the Atlanta BeltLine Corridor Environmental Study Fact Sheet, we support the Marietta Boulevard Trail Alternative. We could also support the On-Street Alternative so long as it does not invade or impact the Conservation Area covered by BWH's Conservation Easement with the City of Atlanta. We oppose the alternative shown as the red dotted line on the page 3 map because it would have very substantial adverse environmental impacts on the Conservation Area.

With respect to the transit alternatives shown on page 2 of the Fact Sheet, based on what we currently understand, and subject to seeing the final design details, we believe that we could support the Marietta Boulevard Transit Alternative if it is located to the north of the CSX Rail Corridor running east from Peachtree Street. We oppose that Alternative or other Alternatives located in or south of the CSX Rail Corridor running east from Peachtree Street. We also oppose the Atlantic Station Alternative. Each of these alternatives would have very substantial adverse impacts on homes in BWH.

The map on page 2 of the Fact Sheet also appears to show a rail transit station in the backyards of some of our BWH neighbors. We oppose any station that would be located on or impact properties in BWH or Peachtree Hills.

Thank you for your consideration.

Response

Thank you for letting us know your trail and transit alignment preferences. In the Tier 1 DEIS, station locations are conceptual. During Tier 2 analysis, station and operating plan details will be developed in consultation with the public.

Comment Record: 2011-21
Comment by: Craig Camuso **Email:** Martin.Marchaterre@amec.com
& Keith Brinker
Date received: 08/18/11 **Source:** dwa_beltlinestudy@bellsouth.net
Category: Agency Comments, Agency Coordination

Comment

Please accept the following comments from CSX Transportation, Inc. (CSXT) with regard to the Atlanta Beltline Tier 1 Draft Environmental Impact Statement (DEIS) review process.

Due to the importance of Atlanta to our overall rail network, CSXT cannot consider any project alternatives that would compromise our ability to move freight rail safely and efficiently through an already heavily congested network of rail lines. Freight rail has been and will continue to be an important part of moving goods into and through the city of Atlanta. It is a viable environmental, safe and efficient solution to the city's transportation challenges.

CSXT operates more than 1,650 miles of railroad in Georgia including an active rail system in the Atlanta area, which serves as a gateway for freight trains entering from five different directions. It is also the home to the company's Tilford Yard, a major classification yard in the northwest part of the city. Tilford Yard processes 1,200 rail cars a day for freight rail transportation for the Atlanta area and freight rail transportation both to and from cities such as New Orleans, Charlotte, Cincinnati, Nashville and points beyond. We also operate two intermodal facilities (IMF) in metro Atlanta, including Hulsey Yard on the east part of the city and Fairburn IMF to the south. These intermodal facilities will continue to grow as Georgia prepares to move more freight to and from its ports by rail in the coming years.

It is with these significant facts that we firmly believe any transit alternatives that run either within or adjacent to the CSXT right-of-way pose a serious risk of negatively affecting these five rail lines or spokes which enter Atlanta from Chattanooga, Augusta, Atlanta, LaGrange and Waycross. Therefore, this project could inhibit our ability to respond to the needs of our customers not only in the specific region, but also the nation.

Recent census figures showed an increase in the number of people who have moved to the Atlanta region. With an average annual freight consumption of 40 tons per person, the amount of products that will be moved into the area will continue to increase each year, and a significant portion of that will be moved by freight rail.

CSXT continues to have serious concerns about the Tier 1 DEIS, which are summarized below.

1) Concerns for Use Either Directly or Indirectly of CSXT Right-of-Way. We have been consistent in our position that any project potentially involving passenger rail or trails within the entire width of right-of-way controlled by CSXT must be addressed through our four principles of uncompromised safety; capacity for current and future needs; no subsidization by the company; and liability protection. These principles are crucial to consideration for any transit alternative. The northwest, southeast and southwest zones of the plan include proposals located on CSXT-controlled right-of-way. In addition, the proposed corridors adjacent to CSXT right-of-way in the northwest zone give us serious concern with regard to the principles due to indirect or cumulative impacts. These concerns will persist until and even after more complete engineering designs are made available.

Response

We agree that coordination with CSX and other potentially affected stakeholders must continue in conjunction with design and evaluation of the BeltLine.

2) Safety. Since the DEIS does not articulate an adequate engineered design of any of the

proposed corridors or the appropriate and required horizontal and vertical clearances necessary between freight rail and the other transportation modes, CSXT maintains its position that safety is not properly addressed in the DEIS. Safety should be more closely considered before any preferred alternative is selected, as opposed to subsequent to the choice of a preferred alternative. The Federal Railroad Administration (FRA) has recognized that operations involving heavy rail and light rail equipment must have considerable and appropriate safeguards to assure a safe network.

Furthermore, CSXT is concerned that access to our tracks for routine and emergency maintenance and other activities will be unacceptably constrained. There must be significant separation distance to allow for maintenance vehicles to access the tracks, and with several constrained areas and pinch points already in existence, we believe the safety of these vehicles and our ability to get to the tracks, coupled with the need for maximum separation between the track and any trail or transit line, will be negatively compromised. Therefore, the additional design considerations should be part of the DEIS and not postponed to later studies.

Response

We agree that considerable safety analysis remains to be done as design moves forward to assure CSX and other stakeholders, as well as MARTA, of the viability of heavy rail in its existing location and of future light rail and streetcar operations.

As a transportation operator, MARTA is equally concerned about the safety of its service operations and facilities; safety is a primary concern for MARTA.

MARTA developed the conceptual alignment alternatives presented in the Tier 1 EIS using the typical section, horizontal and vertical dimensions that are standards in light rail and streetcar design and operations. Allowances have been made beyond those typical dimensions to add a level of conservatism.

That said, MARTA concurs with CSX that considerable coordination must be had with CSX's design, operational, and safety representatives to determine what specific dimensions and clearances are appropriate from CSX's perspective. This work can happen in Tier 1 or Tier 2 because both are phases of a single NEPA process. (See response to comment 4 below).

3) Limited CSXT Involvement in Process. To date, CSXT has had minimal involvement in the NEPA process, and we were not requested to be actively engaged in the development and assessment of project alternatives, especially with regard to those selected on the northwest zone of the Atlanta BeltLine project. Even though the Atlanta BeltLine could pose significant negative impacts upon CSXT operations in three of the four project zones, coordination with CSXT by MARTA and ABI did not occur until an FTA request in the fall of 2010. Any of the alternatives along and within the CSXT right-of-way could have significant adverse impacts on the entire freight rail network. In Section 2.5.4, the DEIS states that “[d]evelopment of typical cross sections for transit and trail alternatives along the active mainline railroad corridors of the northwest zone requires intensive cooperation and interaction between the railroads and MARTA” but to date this cooperation and interaction has not occurred. We believe it is incumbent upon FTA and MARTA that in-depth discussions be held with CSXT in the Tier 1 process rather than waiting until the Tier 2 process, to ensure both current and future freight rail can be moved safely and efficiently.

Response

CSX was invited in July 2008 to be a Technical Advisory Committee (TAC) member for the Tier 1 EIS project and was sent notices to the ten TAC meetings that have been held during the course of the study. Further, ABI representatives met with CSX officials on October 22, 2009 and the project team held a Conference Call with CSX on November 10, 2010 to discuss the Tier 1 EIS progress and to review alternatives in the Northwest Zone.

The BeltLine DEIS process has occurred over a number of years and is proceeding slowly because of the tiered EIS approach. MARTA is committed to on-going coordination with CSX and anticipates an active, working dialog with CSX in Tier 2. See response to comment 4 below.

4) Tier 1 DEIS does not Comply with NEPA Guidelines and Process. The discussion of the effects on freight rail corridors in Section 3.1.5.2 only identifies that Build Alternatives sharing CSXT corridors have “the potential to affect active existing and future freight operations and infrastructure.” CSXT questions the thoroughness and adequacy of the effects analysis on freight rail in the Tier 1 DEIS. It is reasonably foreseeable that alternatives along or within CSXT controlled right-of-way could have significant adverse impacts on safety and severely limit capacity for future growth of CSXT infrastructure and operations to accommodate freight rail needs. These reasonably foreseeable impacts should be addressed in the Tier 1 DEIS and not be postponed until the Tier 2 process. CSXT also does not believe the Tier 1 DEIS complies with NEPA guidelines and processes because it leaves the assessments of secondary and cumulative impacts until the Tier 2 stage. The Tier 1 DEIS must fully consider the potential, direct, indirect and cumulative impact on freight railroad infrastructure and operations.

Response

Tier 1 is not the end of the NEPA process; it is not complete without Tier 2. It is always possible to revert to a Tier 1 alignment or technology if Tier 2 analysis demonstrates that the decisions made in Tier 1 are infeasible or unreasonable during Tier 2 analysis. The point of Tier 1 is to establish that there is justifiable purpose in and need for building a BeltLine in the general configuration shown (on or off a freight alignment) depending on detailed analysis in Tier 2. This process has demonstrated there is generally support for a BeltLine concept even when there continue to be stakeholder and public concerns.

5) CSXT is an Integral Part of the Transportation Network. CSXT rejects the Tier 1 DEIS Need Section characterization of its freight rail lines and right-of-way as a “major physical barrier” that breaks up the “continuity of the transportation network.” Originally, our rail corridors were at the edge of the City but over time neighborhoods and businesses grew up along our rail lines. We do not appreciate being labeled a barrier or a problem in the Tier 1 DEIS and in the public videos. CSXT’s rail lines and intermodal facilities are an integral part of the transportation network delivering essential goods and materials in and around the Atlanta area in a safe and environmentally friendly manner which thereby helps to reduce additional traffic and congestion on the already overcrowded highway system.

Response

The public has stated this on a number of occasions in a number of different communities in the BeltLine study area. The public does not always understand or appreciate that the goods and materials they are accustomed to having arrive on transportation corridors.

MARTA did not intend to portray the freight railroads as being major problems, or to offend CSX. It is true that originally the railroad was the focal point of community life and industry.

However, today the focal point of public attention is more on their access, mobility, and cohesion of their communities.

6) CSXT Formally Requests to be a Consulting Party for the Section 106 Process.

CSXT was not invited to be a consulting party as part of the Section 106 process even though the Historic Railroads of Atlanta BeltLine, which includes CSXT resources, has been determined eligible for the National Register of Historic Places. CSXT has a demonstrated legal and economic interest in the potential historic eligibility of railroad resources in the Atlanta BeltLine as a property owner and operator of freight rail services and therefore, should be a consulting party (see 36 CFR 800.2 and 800.3). This eligibility determination has the potential to affect CSXT operations, maintenance, and future plans as the DEIS states the Historic Railroad resources “is comprised of numerous elements including railroad ROW, track, ballast, bridges, culverts, retaining walls, and other related features.” It is impossible for CSXT to comment on this eligibility determination and potential effects as CSXT has repeatedly requested but has never been provided a copy of the Cultural Resources Reconnaissance Technical Memorandum (2009).

If you have any questions concerning CSXT’s comments on the Tier 1 DEIS, please contact at (904) 359-2228 or via e-mail at Keith.Brinker@csx.com.

Response

The Section 106 process has just begun for BeltLine. When the GA SHPO has had an opportunity to review the reconnaissance survey report and addendum for BeltLine, MARTA will proceed to the next step which is inviting and meeting with Consulting Parties. CSX will certainly be among those invited to be such a party; MARTA understands that as a property owner, CSX will want to participate in discussions regarding its corridor being considered historic and other matters.

Comment Record:	2011-22	
Comment by:	Joshuah Mello	Email: JDMello@AtlantaGA.Gov
Date received:	09/16/11	Source: dwa_beltlinestudy@bellsouth.net
Category:	Agency Comments, Alternate Technology/ Alignment Suggestions	

Comment



M. KASIM REED
MAYOR

CITY OF ATLANTA
DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
55 TRINITY AVENUE, S.W. SUITE 3350 – ATLANTA, GEORGIA 30303
404-330-6145 – FAX: 404-658-7491
<http://www.atlantaga.gov/Government/Planning.aspx>

JAMES E. SHELBY
COMMISSIONER

CHARLETTA WILSON JACKS
DIRECTOR
Bureau of Planning

September 16, 2011

Johnny Dunning, Jr., Senior Director
MARTA Transit System Planning
2424 Piedmont Road NE
Atlanta, GA 30324

Re: Atlanta BeltLine Corridor Environmental Study Comments by City of Atlanta

On behalf of the City of Atlanta's Department of Planning and Community Development, I want to congratulate you on nearing the end of your Tier I EIS. Our office remains deeply committed to the successful completion of the Atlanta BeltLine project and proud of the achievements of both Atlanta BeltLine, Inc and MARTA to date.

We offer the following specific comments on the DEIS alternatives, findings, and analysis:

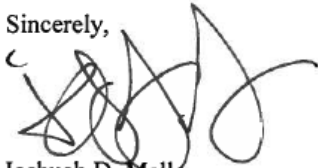
1. **Expediently select preferred connectivity alternatives.** We implore the MARTA-ABI team to select a preferred transit connectivity alternative at each of the MARTA heavy rail connection points as soon as possible. In the absence of a decision, the Department of Planning & Community Development staff is unable to adequately coordinate development review, aid in the protection of future right-of-way needs, and encourage and facilitate transit-oriented development along the many potential routes. The sooner the transit route is identified, the sooner the proper zoning can be in place.
2. **Consider an additional trail alignment under Interstate 85.** The trail connectivity alternative illustrated in Attachment 1 came to light through the work of a local architect studying the Armour-Ottley area. The route crosses Spring-Buford Connector on the easternmost Norfolk-Southern bridge, then proceeds between the connector and I-85 in an unused portion of right-of-way, passing under an approach ramp to the connector, and then reaching the open area under I-85 where it can then proceed along the lines of the previously considered trail connectivity alternatives for the area. The alignment, not previously considered, avoids the tunnels under I-85 and the on-street section through Piedmont Heights. Office of Planning staff conducted a field visit, and the alignment appears to be viable. We recommend the alignment be studied further and considered for official inclusion in the EIS as a potential trail connectivity alternative.
3. **Add a connectivity alternative to that serves the Oakland City MARTA Station.** The recommended alternative is illustrated in Attachment 2. The alignment uses active and inactive portions of the CSX railroad to run through the heart of the Murphy Triangle redevelopment area, passing under the MARTA and freight lines on Dill Avenue where it connects to the Oakland City MARTA Station, and then travels along Lee Street to the Atlanta BeltLine corridor. This alignment has several advantages in that it better serves the Murphy Triangle and Fort McPherson redevelopment areas, does not rely on an infill station, does not require "dead-heading," and is

simpler than the proposed connection to the West End Station. This alignment is particularly attractive as it relates to the proposed Campbellton Road and Pryor Road streetcars identified in the *Connect Atlanta Plan*.

4. **Study the conversion of the Proctor Creek Line to Light Rail or Streetcar service.** The converted line between a point west of Ashby Station and Bankhead Station could be used in part to complete the Atlanta BeltLine transit loop or begin a light rail line towards West Highlands. This would provide operational efficiencies to MARTA by not having to serve the Proctor Creek Line via heavy rail, and resolve a very tight choke point for the BeltLine transit between Washington Park and Maddox Park.
5. **Study an infill station at Krog Street on the MARTA East Line to better serve City of Atlanta residents and provide for direct transfers to BeltLine transit.** The King Memorial MARTA Station and Inman Park/Reynoldstown MARTA Station are 1.5 miles apart, quite far for an urbanized area. A new station at this location would also spare the BeltLine, and potentially I-20 East transit, the complicated and expensive detour to an existing station.
6. **Ensure transit alignments A, B, C, and D can accommodate connections to the Arts Center MARTA Station via 17th Street.** While the proposed Northwest Corridor transit line may ultimately provide service along 17th Street, the project remains unfunded. We request the EIS evaluate how Atlanta BeltLine transit along alignments A, B, C, and D could best connect to proposed transit service to Arts Center MARTA Station via 17th Street.

Thank you for your careful consideration of our comments and I look forward to your response.

Sincerely,



Joshuah D. Mello
Assistant Director for Transportation Planning

Response

Thank you for your support of the Atlanta BeltLine project.

- (1) The project sponsors are also looking forward to evaluating the connectivity areas and identifying preferred connectivity area alternatives; this will occur in Tier 2 analysis.
- (2) At that time, both transit and trail connectivity alternatives will be considered. The suggested trail alignment in the vicinity of I-85 is one of a number of ideas that will be explored in coordination with the Office of Planning staff and other interested parties
- (3) The project sponsors appreciate the City's suggestion of a connectivity alignment serving the Oakland City MARTA Station. In the study of connectivity alternatives during Tier 2, a full range of potential alignments such as the City's suggestion to serve the Oakland City MARTA Station will be considered.
- (4) The idea to use of the Proctor Creek Line for light rail or streetcar service evidences the City's engagement in envisioning future transit services, a mindset MARTA very much appreciates. As the BeltLine advances through the Tier 2 planning process and beyond, this issue can be addressed in the finalization of the transit and trail connectivity alternatives.
- (5) Tier 2 will include focused study of stations, such as the suggested Krog Street infill station.

(6) The Tier I EIS analysis was based on a conceptual level of engineering for each alternative. As this engineering is developed in more detail at the Tier 2 level for the Preferred Alternative the evaluation will consider how it best connect to the proposed transit service to Arts Center MARTA via 17th Street

Comment Record: 2011-23
Comment by: Kristy Gillmann **Email:** phca_kristy@hotmail.com
Date received: 09/17/11 **Source:** dwa_beltlinestudy@bellsouth.net
Category: Community Impacts

Comment

On behalf of the Peachtree Hills Civic Association (PHCA), I am submitting the following comments on the Tier 1 Draft Environmental Impact Statement. PHCA has continuously been a strong supporter of the BeltLine and believes that it is very important to the future of Atlanta. Our comments relate to those portions of the Draft EIS that may impact our neighboring community, Brookwood Hills (BWH) and possibly, Peachtree Hills.

With respect to the trail alternatives shown on page 3 of the Atlanta BeltLine Corridor Environmental Study Fact Sheet, we support the Marietta Boulevard Trail Alternative. We could also support the On-Street Alternative so long as it does not invade or impact the Conservation Area covered by BWH's Conservation Easement with the City of Atlanta. We oppose the alternative shown as the red dotted line on the page 3 map because it would have very substantial adverse environmental impacts on the Conservation Area.

The Conservation Area of BWH has been discussed many times previously with Beltline organizers and planners because of our concern that this area may be adversely impacted. It is vital to the BWH community and since Peachtree Hills lies just north of the creek and rail area bordering BWH, we are also very concerned that planning in or around the Conservation area be discussed in detail, thoughtfully, with representatives from BWH and PHCA.

With respect to the transit alternatives shown on page 2 of the Fact Sheet, based on what we currently understand, and subject to seeing the final design details, we believe that we could support the Marietta Boulevard Transit Alternative if it is located to the north of the CSX Rail Corridor running east from Peachtree Street as long as possible, however not to invade or impact private residences of Peachtree Hills. We also oppose the Atlantic Station Alternative. This alternative would have very substantial adverse impacts on homes in BWH.

The map on page 2 of the Fact Sheet also appears to show a rail transit station in the backyards of some of the BWH neighbors. We oppose any station that would be located on or impact properties in BWH or Peachtree Hills.

Thank you for your consideration.

Response

Thank you for your support of the Atlanta BeltLine and letting us know your transit and trail preferences. The project sponsors have strived to avoid impacts to the Conservation Area of BWH in the conceptual design for the Tier 1 EIS. During Tier 2 analysis, a greater level of alignment and station design will be developed and assessed in consultation with the public.

Comment Record: 2011-24

Comment by: Michelle Marcus
Date received: 09/16/11
Category: EJ/ PI Process

Email: mjmarcus@bellsouth.net
Source: dwa_beltlinestudy@bellsouth.net

Comment

The Atlanta BeltLine Tax Allocation District Advisory Committee (TADAC) appreciates this opportunity to comment on the Atlanta BeltLine Tier 1 Draft Environmental Impact Statement (DEIS). We respectfully submit the following comments:

The DEIS uses a unique set of objectives and metrics that address community values. Performance measures addressed aspects of environmental justice and human health that had been identified through prior rounds of community engagement and analysis of the BeltLine project, in addition to standard environmental measures. Specifically, it included goals and evaluation criteria related to access and mobility, economic development, community development, and support for transportation modes of pedestrian, bicycle and transit. These aspects had been identified as unique problems of health and welfare in the area of the BeltLine, and their inclusion may support a better project outcome. This practice should set a standard for future environmental impact assessment.

However, measurement of these goals may not be as vigorously defined as more traditional metrics. These evaluation criteria should undergo ongoing development and refinement in the Tier 2 study and in the federal environmental impact assessment process. For instance, one metric (Goal 1.g) was "Maximize low-income population within ½ mile of proposed stations." While it is an extremely worthwhile goal to ensure that low-income populations have access to the BeltLine, it would be deleterious if the BeltLine primarily served economically segregated areas because lower-income households will benefit from access to higher-income parts of the region that may offer better jobs and services. Thus, this metric could be clarified to assess the most beneficial economic impact for residents in the BeltLine study area. This is one example; other criteria could be improved from the same scrutiny. However, they are probably adequate for purposes of the BeltLine Tier 1 DEIS.

Some concerns regarding the quality of community engagement arose during the study. TADAC felt that there had been extensive engagement during the initial scoping meetings, but that participation during the evaluation phase was insufficient. They felt the purpose and scheduling of these meetings may not have been clearly and widely publicized; the meetings were primarily listed in the beltline.org event calendar and materials or details about the information that would be presented at the meetings was not provided. TADAC was concerned that the results of community engagement meetings were not being reported to the public in a timely or effective manner. Community concerns or questions which arose repeatedly did not receive a resolution or response; for example, questions about the connection to the Bankhead MARTA station were not answered directly, although favorability toward this connection did play a role in supporting the recommended alignment in the DEIS.

Presentations were made to TADAC on occasion, with a question and answer period which was extremely useful. However, TADAC did not think the Stakeholder Advisory Committee (SAC), on which TADAC held five seats, was being used effectively. Meetings were held with the SAC prior to each round of public meetings. The EIS team would present their latest work to the SAC and then the SAC would be asked to comment on it. Participants from TADAC did not think the SAC meetings provided enough time to consider the information or to consult with the stakeholder populations they were appointed to represent. Meetings with the SAC were typically held one week or less before the public meetings; participants from TADAC did not feel this was

adequate time for them to use reliable methods (community meetings, newsletters) to brief relevant stakeholders about the specific content of the meetings and thus the importance of attending them. Finally, TADAC did not think the meeting materials (such as slide presentations, maps, or charts) were published in a timely manner; these materials were distributed at the meetings but often were not available online for several months after the meetings. Some information was available in newsletters about the EIS process, but the information in them was limited and only produced sporadically. In between meetings, no status updates were released. For instance, no newsletters were released in 2010. These concerns were brought to the attention of the EIS team, and a meeting was held with representatives of TADAC and the EIS team. This meeting resulted in seven recommendations from TADAC to the EIS team. Three of these recommendations were largely satisfied – some improvements in availability of information and materials on the website, implementation of the “Peak Democracy” system prior to the DEIS public comment period, and better communication with TADAC representatives. Recommendations for interim updates and meetings did not appear to receive action. Outcome is unknown in response to a recommendation to review and borrow strategies from exemplary public engagement processes conducted by other agencies in the area.

The Atlanta BeltLine is unique in the use of innovative decision-making processes that govern its development. In particular, its enabling legislation designated that a community benefits plan, an equitable development plan, and a decision support tool should be used in its planning and implementation. The Atlanta BeltLine has many elements that are not typically found in a transit project or trail project. Therefore, the findings and decisions produced in the DEIS should be evaluated as one component of this larger decision-making system. During the funding and implementation of the BeltLine’s transportation components, the Federal Transit Administration, MARTA, City of Atlanta, Atlanta Development Authority, Atlanta BeltLine Inc., and other interested agencies should always consider the spirit as well as the words of the DEIS, and ensure that the progress of the BeltLine is compatible with all of these overarching goals and objectives – for environment, health, equity, and community – in nature, design, and timing.

In summary, TADAC recommends the following:

- (a) Continue to use these performance measures in the future, with further refinement
- (b) Be advised that community engagement could have been and should become more robust
- (c) Thoroughly review participation in the DEIS public comment period to ensure it is representative of the affected stakeholder population
- (d) Focus on resolving recurring community concerns in Tier 2 EIS
- (e) Work with local citizen groups (such as Georgia STAND-UP, Civic League) to identify best community engagement strategies in Tier 2 EIS
- (f) Approve the evaluation and decision
- (g) Utilize the results of the EIS in harmony with other decision-making procedures as defined in the BeltLine enabling legislation

Response:

(a and b) Thank you for recognizing the project-area specific analysis the project sponsors undertook in the Tier 1 DEIS. During Tier 2 analysis, these performance measures will be refined and new performance measures will likely be added to reflect the higher level of engineering and analysis to be undertaken. Likewise, the more detailed level of analysis will necessitate a rigorous public and agency engagement process.

(c, d, e) The project sponsors have considered each and every comment received during the DEIS public comment period. Further, we have considered the comments in the context of what we have heard from the stakeholders and public since the beginning of the Tier 1 EIS process. In this overall context, we observe consistency in what we have heard throughout the study area. We believe the key messages are:

- The Atlanta BeltLine is generally favored although concerns remain related to design details that would be addressed in Tier 2 analysis;
- Mobility and access needs exist and will get worse in the future;
- The preservation of neighborhoods, communities, quality of life, and the environment is paramount; and
- The transportation elements considered in this EIS process should support the Atlanta BeltLine enabling legislation and vision of equitable benefits throughout the study area.

(f) The project sponsors are committed to completing this Tier 1 EIS process so as to enable Tier 2 analysis to begin.

(g) The results of the Tier 1 EIS support the following decisions: technology, general alignment and right-of-way needs. Other decision making procedures defined in the BeltLine enabling legislation will be used for the purposes defined for those tools. As these tools are still under development at this time, it is unknown whether these procedures can be used in harmony with the results of the Tier 1 EIS.

Comment Record: 2011-25
Comment by: Joyce Stanley **Email:** troberon@itsmarta.com
Date received: 09/16/11 **Source:** MARTA
Category: No Comment

Comment

The Department of the Interior (Department) has reviewed the DEIS for the Federal Transit Administration Tier 1 – Atlanta Beltline City of Atlanta. We have no comments at this time.

Response

Comment noted.

Comment Record: 2011-26
Comment by: Terry Bond **Email:** N/A
Date received: 08/23/11 **Source:** Peak Democracy
Category: General Support for Project

Comment

The Beltline is a transportation initiative that is long overdue. I applaud the efforts to integrate greenspace, trails, and mass transit to create an extended livable community which incorporates so much of the city. This type of thinking should be the blueprint for other cities to follow. However, we are still a long way from the type of mass transit system Atlanta needs if we are ever to be the true world-class city that we profess to be.

Response

Thank you for your support of the Atlanta BeltLine and the efforts of the project sponsors.

Comment Record: 2011-27
Comment by: Not shown **Email:** N/A
Date received: 08/18/11 **Source:** Peak Democracy
Category: Community Impacts, Support for a Specific Technology or Alignment

Comment

I like the Marietta Blvd option for transit and trails for the NW sector, in which I live. I can understand that there would need to be a great deal of work in making that section of road environmentally capable of dealing with high numbers of pedestrians, but I think that more than the other options, it frames growth for the area very well, and anticipates the traffic that will be brought into the area by the Westside Park, and would help curb the sort of traffic and parking problems that hit Midtown whenever something is going on at Piedmont Park. I think that if Atlanta were to complete an Atlantic Station route, it would need to be in addition to, not as an alternative to the Marietta Blvd. track. As to the light-rail vs. streetcar options, I don't think that I could answer without knowing how frequently either of these would be progressing through the neighborhoods. If the streetcars would be coming through far more frequently to address more clients, what would that do to traffic and noise? I don't really think that you need to worry about ridership being low - I tend to think that the problem will go the other way, with ridership being higher than you anticipate it, and so if you build light-rail, you probably will fill the trains frequently, but not have to run trains every 2 minutes. If you run streetcars, it seems like the rider experience could be hampered by not enough seats, and eventually, that would spoil people's desire to use the service at all. So, it all depends on more details on those alternatives. From what I've read thus far, I'd go with Light-rail, but would be happy with Streetcars as well.

Response

Thank you for letting us know your mode, transit and trail preferences. We also appreciate your thoughts about an Atlantic Station route.

Comment Record: 2011-28
Comment by: Not shown **Email:** N/A
Date received: 08/16/11 **Source:** Peak Democracy
Category: General Support for Project, Community Impacts

Comment

I am thrilled that Atlanta is making an effort to bring various communities through public transit. The question is if enough will use it so it will thrive. I know that is why you are doing a study about the needs of the people and the costs of different ways to meet them. I am afraid that a transit system for recreation such as shopping and events is good, but what will these neighborhoods be like in the future? It is hot in Atlanta. If these neighborhoods are filled with parents, they will not want to take a bus or train with the kids and carry all sorts of things in this heat. If they are using it to get to work, that is great for the people inside the city (question being what time you stop the train- after happy hour?). I am single. I have no car due to a disability and always will. I want to live in a thriving city where I can get around. I am afraid that people will only use this half of the time and the other half, like MARTA - will not use it at all. Can it be used to connect the night-life to prevent drunk-driving? Would that help to keep it going? I was hoping in the future that it would become a faster track- but I see the rails/paths do not look like they are meant for speed at all. I still think this is a great idea. We all know that everyone is always in a hurry though- and that is why we use the car. We have too many things to carry when we shop that is why we use the car. The kids are with us in this heat- that is why we use the car. How can we beat the car? I say faster is better to avoid the traffic. Also- accommodating the customers with certain services to solve as many inconveniences regarding

public transit would be a good way of indirectly marketing. When riding transit- one cannot lock their belongings away in a car and shop at one area and then another. People in Atlanta are not just going to change. We need to make transit convenient for them. I wish that some shopping areas had places to lock up belongings so that if one is shopping over time during the day, the bags don't accumulate over time and weigh people down. Is there another place like this we can model some shopping centers after? MARTA is conveniently located by Lenox, but I went from KMart to Lenox to the Grocery while in graduate school and was weighed down and wished there was a locker in Lenox to hold my things. Other people could go from place to place and store it in their car as they shopped while I carried everything I bought. Some people would not be strong enough to hold everything I had. Some people would be embarrassed to go from a dollar store to a fancy shopping center with those bags showing. I was hot and exhausted. People will use their cars to shop. I want the beltline. I want public transit. I also want it to run like in a big city- so I can get to as many places as possible, as fast as possible, with very flexible hours. It would help me with finding a job tremendously. I don't agree with putting the trains on the streets when the streets may only get more congested in the future. I don't mind putting them adjacent to the street or on a track or on an existing track. The accidents would be less likely. Depending on the type of tracks, the speed may be able to be increased in the future. Even though it has the right of way- a street car does not seem that different than a bus to me. Trains can create rails/paths that are alternatives/faster routes than existing streets/roads if needed yet be close to them. So- how can we succeed? Beat the car by choosing rail that is fast enough that it will beat the car off of the street with speed and routes needed. I vote to get off of the street. Find accommodations to make it just as convenient, if not more to use public transit than to use a car. Make sure the trains run fast and frequent enough so that a car is not needed to get somewhere because it is faster than waiting for, taking a train and walking to and from the destination. There are many other issues, I know (involving security and other subject matter). I know we cannot meet all of these needs- but we must try or the car will win again. That is all that I have right now. Thank you for working on all of these issues.

Response

Thank you for your support of the Atlanta BeltLine project and letting us know your preferences. During Tier 2 analysis, the project sponsors will assess means to optimize service, thereby attracting the most ridership possible.

Comment Record: 2011-29
Comment by: Alex Munoz **Email:** N/A
Date received: 08/15/11 **Source:** Peak Democracy
Category: General Support for Project

Comment

As a life-long Atlanta resident (except for about 8 years during the 90's) one of the things I was most excited about upon moving back in-town (I am in my mid 40's) from the 'burbs was what was going on with the BeltLine. I know that everyone won't get exactly what everyone wants. It'd be great to get access to the train station so that, theoretically, I could get from my front door to other cities by rail. I echo the first comment and his observations of the Lenox Square cut-through (man, that was a long time ago!); let's not do anything that dumps tons of cars into an environment not made for it. This was one of the problems we observed living out in the suburbs and would hate see happen in-town. Having said all of that, keep going! It's great to see the progress.

Response

Thank you for your support of the Atlanta BeltLine project.

Comment Record: 2011-30
Comment by: Not shown **Email:** N/A
Date received: 08/15/11 **Source:** Peak Democracy
Category: General Support for Project, Support for a Specific Technology or Alignment

Comment

Here are some initial thoughts about these alternatives: (1) I am totally on board with the street car idea over light rail. It looks nice, and it seems like a lower cost and more flexible option for city transit. (2) As a resident in the NW study area who would like to use the Beltline, I would be much more likely to use it if it included a link to Atlantic Station. One of my major concerns about the Beltline is ridership. In order to get people to use this thing (and in the near term, to get people to want to pay increased taxes to build out the Beltline), I think the plans need to include some stops with obvious "daily draws" for people to use them. The east side Beltline proposals seem to do this well (stops at Piedmont Park, Inman Park, etc.) But I fear that the Marietta Boulevard proposals may have too many currently undeveloped stops on its line to get people to use the streetcar in its early years. The Atlantic station line would be much closer to some of the denser neighborhoods on the Westside (Home Park, Georgia Tech, Howell Mill and Marietta Street corridors and Atlantic Station, of course). At the same time, the line would still serve to spur development, especially as it moves southward. Having said that, I do see the value in the Marietta options since they connect to Bankhead and the Westside Park. But this seems like an excellent opportunity to link Atlantic Station up to the wider transit network of Atlanta. (3) As for the trails, why can't we build 2 or three of them in the NW quadrant? I understand this costs money, but it's nowhere near as expensive as the transit component. And I'm not someone who thinks the trails need to be just one single loop around the city. We're much more likely to get better ridership if we have different trails leading into different neighborhoods, right? Since the NW neighborhood forces a rail/trail split anyway, I think you should take this as an opportunity to give trail walkers and riders a few path options. And on that note, why isn't there a trail proposal linking Atlantic Station to the BeltLine? That seems like a majorly missed opportunity here.

Response

Thank you for your support of the Atlanta BeltLine project and letting us know your preferences.

Comment Record: 2011-31
Comment by: Not shown **Email:** N/A
Date received: 09/17/11 **Source:** Peak Democracy
Category: Community Impacts

Comment

We are concerned about the potential light rail designs along Piedmont Road. Not certain whether its impact along Piedmont Road and to Peachtree Battle Creek has been adequately considered/discussed. It appears this may be a future consideration, but wanted to voice the concern.

Response

Future Tier 2 analysis will consider the potential effects of the preferred transit and trails alternatives, including potential effects along Piedmont Road and Peachtree Battle Creek.

Comment Record: 2011-32
Comment by: Andrew McBurney **Email:** N/A
Date received: 09/15/11 **Source:** Peak Democracy
Category: Alternate Technology or Alignment Suggestions

Comment

Environmental Impact Studies (EISs) are required to consider "every reasonable and feasible alternative," are they not? Then why was Heavy-Rail-Transit (HRT) (like the existing MARTA rail) never even mentioned as an alternative?

HRT works best in cities that already have it, on grade-separated right-of-ways (freeways or railroad tracks), and where you want to have a few big developments (instead of storefront by storefront redevelopment)... i.e., Atlanta's Beltline.

It is more expensive to build HRT new, but in Atlanta HRT may actually be cheaper. We already have the cars and maintenance facilities for HRT, which are some of the major costs of building rail. While you might have to build a couple of extra bridges or tunnels, you could integrate an HRT Beltline with the rest of the MARTA system, so you would not need to build new MARTA stations to connect to the Beltline.

Undoubtedly HRT on the Beltline provides the best service to transit users.

For all its merits, I argue that HRT *must* be (at least) considered as an alternative for Atlanta's Beltline.

Response

Early feasibility studies examined various transit modes prior to arriving at SC or LRT. Because of the need for the Atlanta BeltLine to travel on both railroad right-of-way and in-street, only modes that can easily make that transition survived. A fixed guide-way dependent mode like heavy rail cannot be adapted to the Atlanta BeltLine corridor without significant impacts to nearby neighborhoods, roadways and utility infrastructure.

Comment Record: 2011-33
Comment by: Heinz Muller, EPA **Email:** N/A
Date received: 09/21/11 **Source:** Email
Category: Agency Comments, Environmental Impacts

Comment



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

September 16, 2011

Mr. Brian Smart
Transportation Planner
Federal Transit Administration, Region IV
230 Peachtree Street NW, Suite 800
Atlanta, Georgia 30303

SUBJ: EPA Comments on the Atlanta Beltline Corridor Environmental Study
Tier 1 Draft Environmental Impact Statement (DEIS)
City of Atlanta, Fulton County.
CEQ #: 20110236; ERP #: FTA-E40839-GA

Dear Mr. Smart:

The U.S. Environmental Protection Agency (EPA), Region 4, agreed to act as a cooperating agency for the Atlanta Beltline Project on August 19, 2008. Prior to the submittal of the subject document, EPA Region 4 participated in the Atlanta Beltline interagency kick-off, scoping and technical advisory committee (TAC) meetings. Pursuant to Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA), EPA Region 4 has reviewed the Atlanta Beltline Corridor Study. The Tier 1 Draft Environmental Impact Statement (DEIS) evaluates the Federal Transit Administration (FTA) and the Metropolitan Atlanta Rapid Transit Authority (MARTA) proposal to develop a proposed fixed guideway transit and multi-use trails system within a continuous 22-mile corridor around the Midtown and Downtown Atlanta central business districts.

The proposed transit and trail elements of the Atlanta Beltline are intended to be part of a comprehensive development strategy that connects greenspace, trails, transit and new development along segments of historic railroad corridors. The Atlanta Beltline project combines transportation, affordable housing, Brownfield redevelopment, historic preservation, parks and recreation, and land-use components within its corridor.

The Tier 1 DEIS primarily focuses on three key decisions: the preferred transit mode technology, the general alignment of transit and trails, and the necessary right-of-way (ROW). As a result of our review of the Tier 1 DEIS, EPA provides the following comments:

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

Transit along the Atlanta Beltline will connect riders to major activity centers that could include the following: Piedmont Hospital, Atlantic Station, Westside Park, and northern access to Peachtree Street. It will also improve transit service and offer improved connections for bus riders, bicyclists, and pedestrians, and support ongoing neighborhood and commercial revitalization in Atlanta.

The development of additional mass transit options and trail systems for resident and workers within the City of Atlanta is a desirable goal. EPA supports this type of project in urban areas because it provides an alternative to the sole reliance on automobiles for transportation demand, and with proper mitigation should result in fewer adverse impacts. From an air quality perspective, enhanced mass transit, bicycle and pedestrian options reduce the amount of air emissions including green house gas emissions in the transportation corridor compared to highway options.

EPA notes that two types of transit technologies, the modern street car (SC) and light rail transit (LTR), are evaluated in the Tier 1 DEIS. While both technological modes can be implemented along the corridor, the Tier 1 DEIS identifies the SC as the preferred mode technology for the Atlanta Beltline because: 1) the SC's capital costs are lower; 2) the vehicle's length provides greater navigation flexibility; and 3) the SC accommodates more frequent stops. The DEIS also indicates that the SC may result in less noise, vibration and land-use impacts than the LTR. After evaluating both transit technologies, EPA supports the use of either technology for this project.

The Tier 1 DEIS also examines five transit alternative alignments (A, B, C, D, and F) and three trail alignments (Howell Junction Trail, Marietta Blvd Trail and On-Street Trail) in the northwest portion of the study area. Two transit alternative alignments (A and C) use portions of the existing CSX freight rail ROW, two transit alternative alignments (B and D) are adjacent to, but outside of, the existing CSX ROW and one transit alternative is adjacent to but outside the existing Norfolk Southern freight rail corridor (F). The rest of the Atlanta Beltline (northeast, southeast, southwest) follows the same transit and trail alignment.

Using alignments within the CSX ROW would minimize the need for additional ROW and reduce the number of impacted parcels. Typically, EPA recommends staying within or following the existing corridor ROW to avoid and minimize environmental impacts to properties and natural resources. However, EPA notes that that CSX Transportation, Inc. is concerned about the alignments located within their railroad ROW. This concern includes the use of its ROW for commuter rail, for trails, or other non-freight use.

The remaining alternative alignments (B, D and F) each provide specific benefits and limitations. Alternative B, which enables transit and trails to remain together and provides connectivity to Piedmont Hospital and northern access to Peachtree Street, potentially impacts 71 parcels along the corridor. Alternative D, which connects to both the most neighborhood and commercial facilities and parks, also connects to other transit services including Bankhead Station and adds the least amount of storm water runoff. This alternative could potentially impact 68 parcels along the corridor. Westside Park, Piedmont Hospital and northern access to Peachtree Street are some of the key destinations along this corridor. Alternative F, the remaining transit alternative, connects to Atlantic Station and results in low biological, ecological, noise, and vibration impacts. This alternative may impact 56 parcels along the corridor and result in cultural resources impacts, more at-grade crossings and service one less economic development focus area. EPA recommends that these issues be taken into consideration when selecting the preferred alignment. The preferred alternative should maximize benefits while minimizing environmental and social impacts. Of the remaining alternatives (B, D and F), EPA also recommend that the Tier 1 FEIS consider Alternatives D or F as the preferred alternative.

The ROW that will be required to build the transit and rail transport can expose neighboring populations to moderate levels of noise. However, noise mitigation strategies can be used to minimize these effects. The potential for decreased private motor vehicle operations along the SC's or the LTR service line because of the service provision could result in lower overall ambient noise levels.

In addition, the ROW that will be required may also impact some surface water resources. The Tier 1 DEIS identifies potential stream crossings by zone (number and type), wetlands and open water bodies in the project area. EPA recommends that the avoidance and minimization of impacts to surface water resources be considered when selecting the preferred alternative.

EPA has active Brownfields Assessment (\$400,000), Revolving Loan Fund (\$1,000,000), Area-Wide Planning Pilot (~\$175,000), and Job Training (\$300,000,) Grants which support assessment and cleanup for underserved neighborhoods, its related redevelopment corridors within the City of Atlanta and the Atlanta Beltline Corridor. Consequently, we support efforts to improve quality of life and redevelop areas in an environmentally responsible manner.

Based on the information provided in the subject document, EPA strongly supports the project. However, we have identified issues related to noise, water resources and socio-economic impacts and therefore rate the Tier 1 DEIS EC-1 (environmental concerns, some additional information requested). We recommend that these issues be addressed in greater detail in the Tier 2 DEIS.

Thank you for the opportunity to comment on this proposed action. We appreciate the opportunity to continue to work with FTA and MARTA as a cooperating agency on this important project. EPA supports projects that are intended to minimize regional sprawl, improve livability while minimizing environmental impacts. If we can be of further assistance, please feel free to contact Ntale Kajumba at (404) 562-9620 or kajumba.ntale@epa.gov.

Sincerely,



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

Enclosure – Summary of EPA Rating System

cc: Johnny Dunnings, Jr., Senior Director
MARTA Transit System Planning

U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

LO (Lack of Objections): The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

EC (Environmental Concerns): The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

- **EO (Environmental Objections):** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
 1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
 2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
 3. Where there is a violation of an EPA policy declaration;
 4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
 5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- **EU (Environmentally Unsatisfactory):** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
 1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
 2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
 3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

- **1 (Adequate):** The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- **2 (Insufficient Information):** The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- **3 (Inadequate):** The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.

Response

Thank you for your strong support of the Atlanta BeltLine. We appreciate your support of the project goal to add transportation options and trail systems. We also thank you for your reasoned preference for transit alternatives D or F. The project sponsors recognize and have acknowledged in the DEIS that issues such as noise, water resources, and socioeconomics will need to be evaluated in greater detail during Tier 2 analysis. This step will be taken to assure that the Atlanta BeltLine project is advanced in a manner that maximizes transportation and quality of life benefits while avoiding or minimizing adverse impacts and effectively mitigating unavoidable impacts.

Comment Record: 2011-33

Comment by: John S. Sherman

Email: N/A

Date received: 12/16/11

Source: Letter from Fulton County

Taxpayers Foundation, Inc.

Category: Cost Estimates/ Funding

Comment

Fulton County Taxpayers Foundation, Inc.

501(c)(3) Non-Profit Advocate of Lower Taxes In Atlanta/Fulton

President
Vice President
Secretary
Treasurer
Chairman of the Board

John Sherman
Bob Irvin
Barbara Payne
William E. Lane
Joseph L. Kelly, Esq

309 E. Paces Ferry Road, NE, Suite 607
Atlanta, GA 30305
404-869-6066
FAX 404-869-6101
Email: FCTFI@bellsouth.net
Website: http://fctf.org

December 14, 2011

Mr. Keith Melton,
Federal Transit Administration, Region IV,
230 Peachtree Street, NW, Suite 800,
Atlanta, GA 30303

RECEIVED
DEC 16 2011

BY: _____

Dear Mr. Melton,

The Taxpayers Foundation is a non-profit 501©(3), founded in 1990, with over 15,000 taxpayer members. Officers and Board Members serve pro-bono.

The Board has carefully read the Environmental Impact Study on the revised Atlanta Beltline, and offer the following comments:

1. While we support the lake and greenway, we strongly feel that the Light Rail Transit and the Modern Streetcar costs totaling \$3.358 Billion to include the Howell Junction, \$3.403 Billion to include Marietta Boulevard, \$3.338 to include Atlantic Station. There will be an additional cost of \$264 million for the trails to Marietta Boulevard and Howell Junction and the "on street" trails, making the total costs, according to the FTA Impact Study, \$3.6 Billion plus an annual Operating & Maintenance costs of \$26 Million.
2. The huge Right of Ways for the Transit Alternatives and Trail Build Alternatives would add multi millions of additional cost.
3. The Report mentions that the proposed Beltline is "frequently fragmented by major physical barriers" and also "discontinuous local roadway and superblock development patterns." The Report also states "The Beltline provides service to the Central Business District rather than circulation to other activity centers in the City." Finally, the Report concludes "Non-motorized access patterns are limited as a result of discontinuous or absent links in the City's pedestrian and bicycle network, making access to activity centers and the rail and bus system challenging."

Board of Directors

Ron Bell
CEO
Bell Capital Management

Harold J. (Jay) Bowen
President
Bowen Hanes & Company

William E. Lane
Welht Financial
Systems

Marc L. Kanne
CPA
Habif Arogeti & Wynne

James E. Honkisz
Former Senior Counsel
Coca-Cola Company

Joseph L. Kelly
Attorney
Schulten Ward & Turner

Phil Kent
CEO
Phil Kent Consulting

Bob Irvin
Bridge Strategy
Group

John S. Sherman
Former Mayor
Bal Harbour, FL

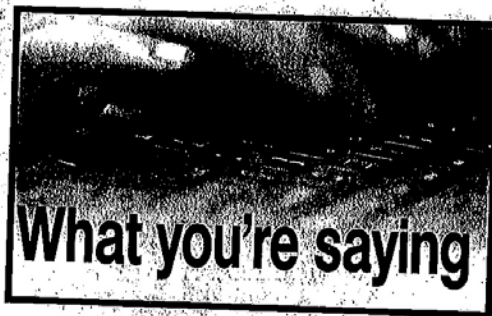
4. In today's economic horizon, funding \$3.6 Billion is really difficult, if not impossible. The Bond Market is extremely weak and the Beltline shows a \$54 Million Deficit (as of an independent audit dated 6/30/10). To expect Federal Funding when the Federal Debt is \$14 Trillion is unrealistic. I have spoken with Senator Johnny Isakson and Representative Tom Price. To look at the Tax Increment to fund the project is also unrealistic when the City's own Feasibility Study by a committee of professional economists, chaired by the highly-respected Dr. Catherine Ross of Georgia Tech, concluded "The amount of revenue to generated from the Beltline Tax Allocation District is expected to cover only about half the funding of what will be needed." The Feasibility Report was prepared when the Beltline estimated its cost at \$2.8 Billion.

The November 2011 issue of the American Bar Association's Journal contains a major article titled "Municipalities Across The Country Are Running Out of Money." In the midst of the worst recession since 1929, the Taxpayers Foundation urges the Mayor and the City Council to reconsider the \$3.6 Billion Transit and Streetcar. The Taxpayers Foundation supports the lake and the greenway already funded with \$165 Million which the City has given to the Beltline.

Mr. Melton, I would be pleased to meet with you and discuss this further. My direct telephone is (404) 233-2997.

Sincerely,


John S. Sherman
President



LETTER TO THE EDITOR

Beltline costs way too high

EDITOR:

The Atlanta Beltline has added three additional transit stations: Howell Junction, Marietta Boulevard and Atlantic Station, and has applied to the Federal Transit Administration (FTA) for funding.

As a result of this request, the FTA recently completed a detailed, 684-page impact study, the conclusions of which should be of great interest to the Atlanta taxpayers:

1. **COST:** The study estimates the cost (Table 7-13) of the entire Beltline, including the three new stations, at \$3.403 billion plus the additional costs of the trails (Table 7-14) at \$264 million for a total estimated costs of \$3.667 billion!

2. **FUNDING:** Although the Beltline is a tax allocation district (TAD), the city's own feasibility study, conducted by a committee of professional economists, chaired by the highly respected Catherine Ross, concluded: "The amount of revenue to be generated from the Beltline TAD is expected to cover only about half the funds of what will be needed." At the time of the city's feasibility study, 2009, the estimated cost of the Beltline was \$1 billion. To expect federal funding when the federal debt is \$15 trillion is unrealistic. Bonding is questionable when, according to an independent audit, the Beltline shows a \$54 million deficit as of June 30, 2010. The 2011 audit, completed by Mauldin & Jenkins, has not been released.

The Fulton County Taxpayers Foundation supports the lake and the greenway, but the transit and streetcars at \$3.667 billion will negatively affect the city's financial stability and may further burden the city's taxpayers.

John Sherman

President, Fulton County Taxpayers Foundation

Response



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IV
Alabama, Florida, Georgia,
Kentucky, Mississippi,
North Carolina, Puerto
Rico, South Carolina,
Tennessee, Virgin Islands

230 Peachtree St., N.W.,
Suite 800
Atlanta, GA 30303
404-865-5600
404-865-5605 (fax)

February 13, 2012

Mr. John Sherman
Fulton County Taxpayers Foundation, Inc.
309 E. Paces Ferry Rd.
Suite 607
Atlanta, GA 30305

Dear Mr. Sherman:

We are in receipt of your letter of December 14, 2011 from the Fulton County Taxpayer's Foundation, Inc. (FCTF) regarding the Atlanta Beltline Tier One -- Environmental Impact Statement (Tier One EIS). As you may know, the Tier One EIS is currently in DRAFT form and is a planning study. This Tier One EIS will help determine the possible alignment and mode of public transit service and trails along the proposed Atlanta Beltline. The Tier One EIS will be followed by more detailed environmental work as segments of the project proceed. As one or more of the segments advance, engineering and predevelopment may then be undertaken. The Tier One EIS is not final, although we hope to have a Final Tier One EIS document sometime in 2012. Regarding the "lake and greenway" your support is acknowledged and is welcome. Regarding your numerous other points that focus on economics, funding, phases, right of way, etc. we feel it would be best if we respond to them point by point.

Tiered EIS

FCTF statement:

The Federal Transit Administration has recently prepared a detailed Environmental Impact Statement for the Atlanta Beltline based on the Beltline's proposal for new transit stations at Howell Junction, Marietta Boulevard, and Atlantic Station.

Response:

The purpose of the Tier 1 EIS is to determine the technology, general alignment and right-of-way needs for the 22-mile Atlanta BeltLine transit and trail corridor. The actual phasing, placement of stations and location of precise alignments have not yet been determined.

Costs

FCTF statement:

The Beltline is now \$3.667 Billion Cost Plus \$26 Million Annual Operating & Maintenance Costs

Response:

The Tier 1 EIS does not address the total cost of the Atlanta BeltLine; it only addresses planning level cost estimates for the transit and trail components by various alignments. The preferred transit alternative is now estimated to cost approximately \$ 1.6 B. The preferred trail alternative is estimated to cost \$ 130 M

(approximate). We do not know the origin of the \$3.667 B number referenced. Likewise, operating costs are not yet known and will vary by alignment and mode chosen.

FCTF statement:

Costs Estimated By Federal Transit Administration

After in-depth review of the Project Needs, the Alternatives Considered, the Affected Environment, the Secondary & Cumulative Effects, the Construction Impacts, Preliminary Evaluation of Alternatives, the Statement presents in Section 7-16, a "Preliminary Cost Estimates for each Transit Build Alternatives", three alternatives include Howell Junction, Marietta Boulevard, and Atlantic Station. "The estimates consider typical unit costs for similar transit systems expressed in 2009 dollars. The costs of alignment specific needs associating with implementing each of the alternatives, such as bridges and tunnels were considered. These cost estimates on Table 7-13 were calculated for the entire Beltline corridor including the new stations:

Howell Junction (B) Light Rail Transit Costs	\$ 1.787 Billion
Howell Junction (B) Modern Streetcar Costs	\$ 1.571 Billion
Marietta Boulevard (D) Light Rail Transit Costs	\$ 1.792 Billion
Marietta Boulevard (D) Modern Streetcar Costs	\$ 1.611 Billion
Atlantic Station (F) Light Rail Transit Costs	\$ 1.760 Billion
Atlantic Station (F) Modern Streetcar Costs	\$ 1.578 Billion

Response:

Only one of these six alternatives will likely be constructed. MARTA and FTA are using the Tier 1 EIS to determine which of the six alternatives may be selected based on the information presented in the Tier One EIS and public input. As the project evolves, other segments/phases may also be considered.

FCTF statement:

Table 7-14 indicates the "Capital Cost Estimates, Trail Alternatives" will cost \$264 Million (\$129 Million for the Trails to include Marietta Boulevard and Howell Junction and \$135 Million for "On-Street" Trails).

Response:

Only one of these two trail alternatives will likely be constructed. So the actual cost will be either \$129 M or \$135 M, estimated; not the total of the two.

FCTF statement:

In addition to these huge costs, the report indicates on Table 7-15 the Preliminary Cost Estimates for Operating & Maintenance will be \$26 Million per year with the added Howell Junction, Marietta Boulevard, and Atlantic Station.

Response:

Only one of the three transit alternatives (Howell Junction or Marietta Boulevard or Atlantic Station) will likely be constructed, not all three. MARTA and FTA are determining which of the three alternatives will likely be selected based on the Tier One EIS and public input. Again, other segments and changes in routes/alignments may also be considered as the work evolves.

Rights of Way

FCTF Statement:

The huge rights of way for the transit alternatives and trail build alternatives would add multi millions of additional costs.

Response:

Right of way costs are generally included within stated/estimated costs within the Tier One EIS and are preliminary. Some portions of the ROW are already owned by the public (or the non-profit entity advancing the proposal) while others will have to be appraised and acquired in the future.

Segmentation/Phasing

FCTF statement:

The Federal Transit Administration has recently prepared a detailed Environmental Impact Statement for the Atlanta Beltline based on the Beltline's proposal for new transit stations at Howell Junction, Marietta Boulevard, and Atlantic Station.

Response:

The purpose of the Tier 1 EIS is to determine the technology/mode, general alignment and right-of-way needs for the 22-mile Atlanta BeltLine transit and trails corridor.

Purpose and Need

FCTF statement:

The Beltline Will NOT Provide Mobility & Access

The Report mentions that the proposed Beltline is "frequently fragmented by major physical barriers, i.e., interstate highways and abandoned railroad lines and yards." It is also faced with "discontinuous local roadway and superblock development patterns." These deficiencies are particularly difficult adjacent to the proposed Atlanta Beltline railroad corridors where the continuity is broken by numerous large tracts of industrial land and the high density of railroad Right of Way that have few existing crossings. The Report also mentions that the proposed Beltline "provides service to the Central Business District rather than circulation to other activity centers in the City." Finally, the Report states "Non-motorized access options are limited as a result of discontinuous or absent links in the City's pedestrian and bicycle network, making walk access to activity centers and the rail and bus system challenging."

Response:

This statement appears to be taken from the "Need" for the project section. The statement is making the point that in the area that is served by the Atlanta BeltLine, there are many breaks and discontinuities in the existing transportation system which the Atlanta BeltLine will help rectify and address through transit and trail improvements to make them accessible. Such accessibility will help attract new uses and investment to close-in tracts which have been largely passed over due to inaccessibility.

Funding Sources

FCTF statement:

The Bond Market is extremely weak and the Beltline shows a \$54 million deficit as of a 6/30/10 Independent Audit would not be of interest to bond buyers. To expect federal funding when the federal debt is \$14 trillion is unrealistic. To look to the tax increment to fund the project is also unrealistic when the City's own Feasibility Study by a committee of professional economists, chaired by the highly-respected Dr. Catherine Ross concluded "The amount of revenue to be generated from the Beltline Tax Allocation District is expected to cover only about half the funding of what will be needed." The Beltline's web-site indicates that "the City has already invested \$165 Million in the Beltline", but in the November 18th AJC it is reported on page 1 of the Metro Section that "the City's acting Chief Financial Officer projects a shortfall in the 2012 City Budget."

Response:

We understand the Tax Allocation District (TAD) was set up to help establish the Beltline and improve accessibility to the underutilized (and in some cases abandoned) corridor. We understand the TAD has performed strongly since its inception and the last Bond sale was in fact oversubscribed. The financial position of the project is said to be stable and the amount of tax increment in the TAD exceeds debt service payments by nearly three to one. No doubt funding for transportation is being considered at the federal level and Congress is working to find ways to assist transit and other projects. In addition, we understand the Atlanta BeltLine does not rely on funds from the City's general fund, so a shortfall in the 2012 City budget would not likely affect the project.

Conclusion

FCTF statement:

In the midst of the worst recession since 1929, the Taxpayers Foundation strongly urges the Mayor and City Council to reconsider the unaffordable \$3.66 Billion for the Beltline. The Foundation supports the lake and greenway but we feel that the \$3.66 Billion for the Light Rail and Streetcar together with the \$26 Million annual operating and maintenance costs will negatively affect the City's financial rating and may further burden the City's taxpayers.

Response:

We understand the recession is over and the economy is growing – albeit slowly. Since 2005, the city reports more than \$1 billion in private investment and development has been attracted to the BeltLine TAD. New developments such as Ponce City Market are generating more tax increment and providing more funding for improvements. City officials contend that numerous mixed use opportunities provided by the Beltline transit and trails, as well as open space and parks, will result in considerable re-development. We understand these uses will create thousands of jobs over time. Further, city representatives indicate that these largely underutilized areas will only meet their potential if the Beltline is constructed and a largely underutilized area is re-born. Thank you for your comments.

Sincerely,



Keith Melton, Community Planner
FTA Region IV

CC: Yvette Taylor, Ph.D. Regional Administrator, FTA
Erica Matos, Legal Counsel
Brian Smart, EPS

Following are MARTA and ABI's responses.

(1) The preliminary capital cost estimates for the transit alternatives considered in the DEIS are reported, by alternative, in Section 7.3 of the Tier 1 DEIS. Only one of the six alternatives and one of the trail alternatives will likely be constructed. The preferred transit alternative is now estimated and reported in the Tier 1 FEIS to cost approximately \$1.6 billion; the preferred trail alternative is now estimated to cost approximately \$100 million. Costs will be refined and reported during the Tier 2 analysis.

(2) Only one of the three transit alternatives (Howell Station, Marietta Boulevard, or Atlantic Station) will likely be constructed. Right-of-way cost estimates are included in the estimated costs in the Tier 1 EIS and are preliminary. Right-of-way costs will be refined and reported during the Tier 2 analysis.

(3) This comment incorrectly attributes several DEIS statements of condition in Section 1.2 to the proposed Atlanta BeltLine. The statements refer to existing conditions. Regarding the second quote, the DEIS text actually reads, "discontinuous local roadway, bicycle and pedestrian networks and super block development patterns." Regarding the third quote, "The BeltLine provides service to the Central Business District rather than circulation to thither activity centers in the City" the DEIS actually reads, "The existing rail and bus transit network provides limited coverage and connectivity in the study area and is focused primarily on providing service to the Central Business District rather than circulation within the study area or to other activity centers in the city." Regarding the fourth quote, the DEIS actually reads, "At the same time, non-motorized access options are also limited as a result of discontinuous or absent links in the City's pedestrian and bicycle network, making walk access to activity centers and the rail and bus system challenging."

(4) The project sponsors realize securing funding to implement the Atlanta BeltLine is a challenge. However, the Tax Allocation District (TAD), which was established for the Atlanta BeltLine, has performed strongly since its inception and is considered stable. In addition, federal transportation funding sources are being considered. As City General Funds will not be used for the project, the City budget will not affect the Atlanta BeltLine. Alternative funding sources are being investigated by the project sponsors and a realistic implementation plan will be developed. The project sponsors are optimistic that funding needs for the Atlanta BeltLine can be met, enabling the project to complement the catalytic effect it is already having on investment and development.

Page Left Intentionally Blank