Atlanta Regional Commission
200 Northcreek, Suite 300
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Atlanta, Georgia 30327-2809

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ARC

April 7, 1997

Honorable Mitch Skandalakis, Chairman
Fulton County Commission
141 Pryor Street, SW
Atlanta GA 30303

RE: Development of Regional Impact - CSX Intermodal Facility

Dear Mitch:

I am writing to officially transmit the resolution which the Commission adopted on March 26, 1997, concerning the re-review of the proposed CSX Intermodal Facility, a Development of Regional Impact (DRI). As you know, based on additional information, studies, and plans to address the concerns from the September 1996, review, the Commission found the proposed facility is now in the best interest of the State. This favorable finding is conditioned on CSX continuing to keep the impervious surface at no more than 25 percent of the entire site and controlling the quantity and quality of stormwater runoff to pre-development levels. Also, it is conditioned on CSX working with the City of Fairburn and Fulton County to enforce the traffic management plan for tractor-trailer vehicles to ensure use of local streets is discouraged. For information, CSX agreed to reconstruct the impacted section of McLaren Road as well.

In addition, if the County allows this project to move forward, the ARC staff suggests that the County require a monitoring, maintenance, and remediation agreement concerning stormwater runoff. (See attached suggestions.)

Since this is a re-review of a DRI previously determined not in the best interest of the State because of specific concerns and the reconsideration was based on studies addressing those concerns, the typical Review Report is not applicable and therefore not included in this case.

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Norman L. Underwood

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March 4, 1997

VIA HAND DELIVERY

Ms. Beverly Rhea
Review Coordinator
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Pkwy.
Atlanta, GA 30327-2809

Re: Proposed Intermodal Terminal at Fairburn, Georgia

Dear Beverly:

Enclosed find a copy of the various environmental studies which have been conducted in connection with the proposed CSX Intermodal terminal. These materials have been filed with the Planning Department of Fulton County, and it is my expectation that you will receive a copy from Fulton County. However, knowing that time is of the essence in connection with this review, I am sending an extra copy to you simultaneously with our filing it with Fulton County.

It is my understanding that an appointment has been scheduled with you for Wednesday, March 5th, at 3:00 p.m. for Jim Wilgus and the Post, Buckley traffic engineer to go over certain matters involving the traffic study, as well as discuss the measures which have been taken to protect the Line Creek watershed. I plan to attend that meeting and we are prepared to have any of the consultants provide any additional information on an immediate basis which may be helpful to you and your staff in connection with this review.

We will look forward to seeing you on Wednesday afternoon at 3:00 p.m.

Sincerely,

Norman L. Underwood

NLU/dpo
Enclosures

FAIRBURN INTERMODAL TERMINAL

Applicant's Summary of Project Benefits and Response to Environmental Concerns

The leading Georgia authority on intermodal transportation is Michael D. Meyer, Professor and Chair of the School of Civil and Environmental Engineering, Georgia Institute of Technology.

In a recent letter to the Georgia Environmental Protection Division, Professor Meyer summarized his evaluation of the Fairburn intermodal terminal:

> "The economic impact of the intermodal facility on the economy of Atlanta will be great. I conclude from the analysis that air quality improvements will also occur. The concept of the Fairburn Intermodal Terminal makes a lot of sense, when viewed from a policy, planning and environmental perspective."

Professor Meyer referenced his personal research experience for the U.S. Department of Transportation and the Georgia Department of Transportation and reached the following conclusion:

> Put simply, this type of project is exactly the kind that was envisioned by the U.S. Congress when it passed the Intermodal Surface Transportation Efficiency Act in 1991. Assuring greater efficiencies in transportation by making intermodal transfers more convenient and productive was viewed as one of the most important and cost effective means of improving our nation's transportation system. I have done case studies throughout the U.S. which have examined the improved productivity that results from enhanced intermodal transfers. The Fairburn Terminal certainly falls into this category. Importantly, the concept of removing truck traffic from the region's highways and replacing them with trailer-on-flat-car movements will clearly have major benefits to highway safety, reduced congestion and improvements to air quality. The CSX Fairburn project, in particular, will have a significant positive effect in this regard. This is especially true when one considers that the only reasonable alternative is to expand operations in the existing Hulsey terminal which would imply over the long term increased truck operations and the resulting impacts in the urban core.

A copy of Professor Meyer's letter is attached to this Summary.

The Application and Its Purpose. The pending zoning application would change 124 acres currently in the M-1 (light industrial) zoning classification to the M-2 (heavy industrial) zoning classification. The 124 acre parcel involved in the zoning is located toward one end of a 500 acre site owned by CSX which includes 360 acres currently zoned M-2.

The purpose of the application is to permit CSX Intermodal to design and build a longer, more narrow and more efficient intermodal terminal than can be built on the 360 acres currently zoned heavy industrial. The longer, narrower design will permit better use of the entire 500 acre site and will make it possible to provide larger buffers, and significantly greater distances of separation between the intermodal facility and residences located along Creekwood Road and will permit all aspects of staging, loading and unloading trains to take place within the terminal.

Container Cargo Transportation is a Major Element in Atlanta's Economy. Because Atlanta is the main transportation and distribution hub of the southeast, container cargo handling and transportation is a major component of the economic base for the region. This is best illustrated by the decision of United Parcel Service to move its headquarters to Atlanta a few years ago. UPS is a major user of container intermodal services. The Fairburn terminal will enable UPS and other Atlanta area users of container cargo services to have the benefits of a modern, efficient intermodal terminal.

Specific Economic Benefits to South Fulton County and the Metropolitan Region. Many existing businesses which use container cargo services will benefit by having a modern intermodal terminal located closer to their facilities which will lower their operating costs by providing better and quicker access to intermodal service. South Fulton County will become a more competitive location for quality economic development involving warehousing and distribution. The consulting firm of Wilbur Smith & Associates conducted an economic impact study of the Fairburn terminal and concluded that:

- The proposed Fairburn terminal will create over $180 million in economic activity for metropolitan Atlanta over the next ten years, and
- It will create 450 new jobs in the south Fulton economy, and
- It will enable Atlanta to maintain its competitive edge in the distribution sector of the economy well into the 21st Century. (A copy of the Economic Impact Study is in the accompanying resources book.)

The Fairburn Terminal Will Improve the Region's Air Quality. The Fairburn terminal will improve the region's air quality in three ways:

1. Truck mileage to serve the container cargo traffic needs of existing customers who use the CSX Hulsey facility will be reduced by approximately four million miles of truck driving within the region which will reduce undesirable air emissions (Nitrous Oxides or NOx) by approximately 45 tons annually. (Source: studies conducted by Holton Environmental Associates and Post, Buckley, Schuh & Jernigan.)
2. Locomotive ton miles in the region will be reduced by approximately 51 million ton miles due to trains which provide service to the south and west no longer having to travel into the central core of Atlanta. This will further

reduce NOx emissions within the region by 12.3 tons per year. (Source: study conducted by Post, Buckley, Schuh & Jernigan.)

3. As Atlanta's distribution economy continues to grow an efficient, modern intermodal facility will mean that an increasing portion of container cargo will be moved through the region by rail rather than by trucks on the highway system. (See February 28 letter of Professor Meyer.)

In addition to the positive impact on air quality, there will be a positive impact on traffic congestion and traffic safety resulting from four million fewer truck miles annually on the expressway system which leads to the Hulsey terminal in the center of Atlanta.

The Georgia Port Authority management has stated to CSX Intermodal its strong support for the construction of the Fairburn terminal and has indicated that it will use intermodal services for a significant volume of container cargo destined for the Atlanta metropolitan area which currently is moved by trucks. While it is not possible to quantify this projected volume of container traffic at this time, it is clear that a significant number of cargo containers which now arrive in Atlanta each day by truck on the interstate highway system and move through Atlanta's expressway system will, if the Fairburn terminal is built, arrive and move through the region by rail. This is a specific illustration of the ability of the Fairburn terminal to have a positive impact on the level of traffic congestion on Atlanta's expressway system.

Why the Fairburn Site was Selected. The proposed site of the terminal immediately south of Fairburn was selected after a two year site selection study by CSX Intermodal management and its project engineers. In order to accommodate a south metro terminal, it was necessary that a site be located on the main line of a CSX track which provides western and southern directional service into and out of the metropolitan area. In addition to meeting that requirement, the proposed site was selected for the following reasons:

- The availability of 500 acres makes it possible to have large buffer areas and significant distances between the actual terminal and adjacent residential property. The actual operating area of the terminal at full build-out will be approximately 100 acres in an elongated design.

- The proposed use is consistent with the Fulton County Comprehensive Land Use Plan.

- The proposed site has been zoned industrial for over three decades.

- The proposed site has very good access from Interstate 85 and good alternate access provided by U.S. 29 (Roosevelt Highway).

- The existing land uses in the vicinity are predominantly industrial as evidenced by the adjacent land use devoted to the Owings Corning plant and the DSI Transbulk terminal.

- The 500 acre site has only approximately six acres of wetlands which will be impacted by constructing the terminal and the large site makes it possible to fully mitigate the impact upon the wetlands area.

- CSX Intermodal management and the project engineers specifically and carefully considered the possible impacts upon the Creekwood Road residential property owners and on the basis of professional environmental assessments determined that there would be no meaningful adverse environmental consequences on these residential properties from operations of the terminal facility.

Vehicular Access to the Site. CSX Intermodal management anticipates that in excess of 80% of trucks delivering and picking up cargo containers at the terminal will use Interstate 85 and State Road 74 (Senoia Road) to McLarin Road as the access route for the facility. A strong consideration in the location decision was the fact that State Road 74 as shown by a traffic study has significant unused capacity and will still have good levels of service after all of the traffic associated with the terminal becomes part of the traffic stream using this corridor. Of particular interest to the site selection team was that more than 80% of the trucks using the Fairburn terminal will arrive and depart by this 1.5 mile access route without passing a single residential driveway and without impacting any residential property in any direct way whatever. The site selection team believes it is unlikely that any other site could be located in the region with an access road (to an interstate highway) which does not pass or impact a single residential property.

CSX management will be able to exert a high degree of control over the access routes used by trucks associated with the terminal by implementing a traffic management plan which will direct each truck driver as to the appropriate access route.

The City of Fairburn commented to ARC that the truck traffic would have an undesirable impact on its historic retail area along its main street. State Road 74 intersects with McLarin Road south of Fairburn's business district, and with more than 80% of the truck traffic using this access route, it is clear that the number of additional trucks which may drive through the business district of Fairburn will be minimal and will not have a measurable impact on the retail areas.

Additional concerns expressed by the City of Fairburn involve the condition of McLarin Road and the potential for trains to block railroad crossings during staging and building trains.

The following conditions of zoning have been recommended by the Fulton County Planning Staff and CSX management has agreed to these conditions:

1. Provide a left turn lane on McLarin Road or as directed by the Fulton County Traffic Engineer and/or the City of Fairburn.

2. Improve McLarin Road to industrial standards or as directed by the Fulton County Traffic Engineer and/or the City of Fairburn.

3. Improve roadway along McLarin Road with curb and gutter per Fulton County Standards or as directed by the Fulton County Traffic Engineer.

4. Submit traffic management plan for tractor-trailer vehicles to ensure use of local residential streets is discouraged.

These conditions of zoning are directly responsive to the comments and concerns expressed by the City of Fairburn as well as the previous comment submitted by the Georgia Department of Transportation.

With respect to the concern about blocking railroad crossings, it is important to emphasize that the proposed design of the terminal facility if the full site can be utilized as requested in the proposed zoning means that the process of staging and building trains will occur on site within the terminal property. This is one of the major reasons why the proposed terminal design using the full site is superior to an alternative design which would use only the 360 acres currently zoned M-2.

Protection of Line Creek Water Supply Watershed. The Creekwood Road Coalition, the Line Creek neighborhood group, and Fayette County have expressed concerns that the proposed facility possibly could contaminate the Line Creek water supply watershed. According to Post, Buckley, Schuh & Jernigan, project engineers for the terminal, there are only two possible sources of contamination of Line Creek associated with the proposed terminal: (1) the asphalt area where containers will be parked; and (2) the equipment maintenance area.

Asphalt Surface Area. The project engineers have already obtained a Stream Buffer Encroachment Permit from the Georgia Department of Natural Resources in connection with the proposed terminal. Pursuant to the requirements for obtaining the permit, the first one-half inch of rainfall on the asphalt area will be held on-site in what is characterized as a "first flush pond." This water is held for 48 hours and any possible contaminants contained in this water would be either settled out or biologically treated in the holding pond. The design for the facility provides that any oil, or other contaminants that may be located on the facility's asphalt surface would be carried by the first one half inch of rainfall of a storm into the holding pond for settlement or treatment. The design of the facility is such that when more than one half inch of rainfall occurs in one storm, the additional water generated does not flow into the holding pond described above but flows into a separate detention pond which is sized to accommodate a 100 year storm. It is the professional opinion of the project engineers that this design adequately protects the Line Creek water supply watershed and based upon this design, the Georgia Department of Natural Resources has issued the Stream Encroachment Permit.

Equipment Maintenance Area. The equipment maintenance area as designed by the project engineers is entirely self contained which means that any storm water collected in this area will be treated by a pollution control system and released to the

sanitary sewer system as industrial waste water. The practical effect of the design is that whatever level of rainfall should be experienced by the facility, all water collected at the maintenance area will go into the sanitary sewer system and will not impact the storm run-off sewer system.

Wetlands Mitigation and Corps of Engineers Permit. The site includes approximately six acres of wetlands as defined by the United States Army Corps of Engineers Jurisdictional Determination. As part of the project design, CSX Intermodal will enhance and rehabilitate approximately 21 acres down stream from the facility. This enhancement and rehabilitation is a practical re-establishment of 21 acres of wetlands along the banks of Line Creek. This mitigation process will be implemented pursuant to regulations promulgated by the Corps of Engineers and the process of obtaining a Section 404 permit from the Corps of Engineers is well underway. It is the opinion of the project engineers that all criteria for granting a Section 404 permit will be met by the mitigation procedures contemplated in the design of the facility.

Possible Spill or Leak from Cargo Container. While extensive operating experience involving cargo containers clearly indicates that spills of contaminants or hazardous materials out of cargo containers is rare, in the event of such spillage, CSX has well established procedures formulated as part of the Best Management Practices of the transportation industry to contain and minimize such leakage or spillage. A central feature of the CSX contingency plan is the instantaneous notification of a spill response team which goes to the site immediately to address any spillage or leakage. It is the opinion of the project engineers that the design of the facility coupled with the well established procedures and practices which would be used in the event of spillage or leakage of contaminants means that the possibility of any contaminants impacting the Line Creek water supply watershed is extremely remote. (Source: Post, Buckley, Schuh & Jernigan)

Traffic. The City of Fairburn, the Creekwood Road Coalition, and other agencies or individuals expressed concerns about the proposed facility creating unacceptable traffic problems. The applicant has submitted to the Fulton County Planning Department a traffic study conducted by Post, Buckley, Schuh & Jernigan which was carried out to measure the impacts of the terminal upon the existing road system in the area. The professional traffic engineers who conducted the traffic study concluded that:

> [I]t can be concluded that additional traffic from the proposed rail yard will have a minimal impact on existing traffic operations on the current roadways serving the area. The vehicles traveling in this area are anticipated to experience less than average delays with the exception of I-85/Senoia Road (State Road 74) interchange area.

The traffic study included analysis of existing volumes of traffic at each intersection in the vicinity of the proposed facility. Next, the traffic engineers simulated the volume of traffic associated with the proposed facility into the existing traffic streams.

Even though phase one of the proposed terminal will involve an estimated maximum of 300 truck trips per day, for purposes of the traffic study it was assumed that all truck traffic now using the Hulsey terminal will be transferred to the Fairburn terminal. For purposes of the study, it was assumed that traffic levels would be those of full build-out or in excess of 1,000 truck trips per day. The traffic engineers who conducted the study made the following findings in making reference to data in the study.

> The morning peak hour in the study area occurs between 7:15 and 8:15. The 1997 morning peak hour traffic volumes used in the traffic simulation are shown in Figure 1. Figure 2 shows the traffic volumes with the CSX terminal traffic taken into account. As can be seen in Figure 2, CSX adds only 45 trucks to the study area. The CSX traffic is less than 1 percent of the traffic in the study area during the morning peak hour.
>
> The afternoon hour occurs between 4:30 and 5:30 in the study area. The 1997 afternoon peak hour traffic volumes used in the NETSIM analysis are shown in Figure 5. The 1997 traffic volumes with the CSX terminal traffic is shown in Figure 6, CSX adds only 65 trucks to the study area. The CSX truck traffic is only 1.5 percent of the traffic in the study area during the afternoon peak hour.

The study shows that under today's conditions the Interstate 85\Senoia Road interchange experiences category D service (extended delays) and that condition is unrelated to the proposed facility. The relevant question is the extent to which the service level at this interchange will be exacerbated by the proposed facility. The conclusion of the traffic engineers who conducted the study is that the level of service will remain at the category D level after the Fairburn terminal is constructed. In other words, the volume of truck traffic injected into the traffic stream at this interchange during the morning and afternoon peak hours will not have an appreciable impact on the service level of the interchange.

Representatives of the Creekwood Road Coalition have vigorously expressed their opinions that additional truck traffic delivering and picking up containers at the terminal will dramatically impact traffic flows in the area. However, the traffic study based upon uncontroverted traffic counts for present and future traffic flows shows that the road system in the vicinity of the proposed terminal has adequate capacity to handle the traffic generated by the facility. It appears, therefore, that the vocal opposition and concern about truck traffic reflects a general negative attitude toward "18 wheeler" trucks rather than an objective analysis of the capacity of the access roads and the main corridors to accommodate the maximum number of truck trips which will ever be generated by the terminal operation. (A copy of the Traffic Study is included in the accompanying resource book.)

Noise. The Creekwood Road Coalition has expressed a concern that operation of the terminal facility will result in unacceptable levels of additional noise at their residences. To assess the noise impact from operations of the facility the project engineers conducted studies under the supervision of engineers trained and experienced in noise measurement and measured ambient noise levels during daylight hours and night hours at various designated locations on

Creekwood Road. Actual noise data from operations at the Hulsey terminal were gathered and applied to the Fairburn terminal site.

These studies establish that the ambient noise level on Creekwood Road today is at the 50 decibel level which can be compared to an urban setting or the equivalent of a dishwasher operation in an adjacent room. Two obvious sources of the existing ambient noise level are the close proximity of Creekwood Road to Interstate 85 and the aircraft traffic associated with Hartsfield International Airport. Obviously, those noise sources will continue to sustain the present noise level on Creekwood Road whether the proposed terminal is constructed or not.

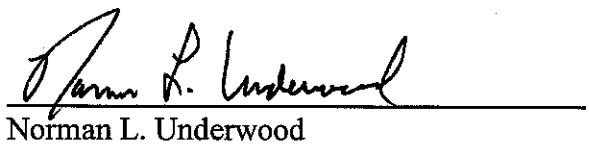
The study indicates that at the closest residential property (the Stover residence) operation of the terminal will increase the ambient noise level by 1.5 decibels. At other points on Creekwood Road, operation of the terminal will not increase the ambient noise level by any measurable amount (less than one decibel). At the present time residents of Creekwood Road hear trains which travel on the CSX mainline and periodically will hear some aspects of the industrial operation at Owings Corning and DSI Transbulk. The operation of the intermodal terminal will be a similar noise source which will produce some additional noise sources such as trains arriving and leaving the terminal. These noises will be comparable to those heard on the mainline railroad several times each day at the current time. As shown by the noise study, these periodic noise occurrences will not be loud enough or frequent enough to impact the ambient noise levels on Creekwood Road. (A copy of the Noise Study is attached.)

Hazardous Materials. It is important to understand that the only kind of cargo that will be handled at the Fairburn Intermodal terminal will be containerized cargo. Terminal operations for this terminal will not involve opening the containers or repackaging, or in any way processing or altering the cargo contained in the containers. Because the cargo containers are not opened at the terminal the experience of CSX Intermodal indicates that it is extremely rare to have any spillage or leakage of hazardous materials from the containers. Any cargo which contains materials classified by the United States Department of Transportation as hazardous materials must have attached in a visible location a placard indicating that the container includes hazardous materials and indicating certain technical information about the material. The shipment of any placarded materials is subject to extensive regulation and oversight by the United States Department of Transportation. It is not uncommon for a container to be placarded as containing hazardous materials due to the large number of consumer goods which contain some materials which meet the definition of hazardous materials. Examples would be flashlight batteries, cosmetic products such as fingernail polish remover and other similar products.

As explained in the above comments dealing with protecting the Line Creek watershed, in the event of any spillage of leakage of hazardous materials, CSX invokes established procedures to deal quickly and effectively with any such spill or leak. Based upon their familiarity with the design of the terminal and the operations of existing intermodal terminals, it is the professional opinion of the project engineers that the possibility of any incident involving hazardous materials creating environmental concerns beyond the confines of the terminal site is extremely remote.

Conclusion. The pending zoning application has been vocally opposed by residents of Creekwood Road, and various environmental concerns have been voiced by other groups in the area. The extensive professional environmental reports summarized here demonstrate that the Fairburn terminal will not be a facility which imposes environmental risks or unacceptable burdens on the community in which it is located. Applicant submits that all of the environmental concerns raised in the review process have been addressed and that the terminal's benefits to the region far outweigh the minimal localized environmental impacts that might be characterized as negative.

Respectfully submitted for
CSX Intermodal, Inc. by



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Georgia Institute of Technology
School of Civil and Environmental Engineering

Mr. Marlin Gottschalk, Ph.D.
Program Manager
Environmental Protection Division
Air Protection Branch
Atlanta Tradeport, Suite 136
4244 International Parkway
Atlanta, GA 30354

February 28, 1997

RE: CSX Intermodal Terminal
Fairburn, GA

Dr. Gottschalk:

I often hesitate to comment on proposals pending before regulatory or permit-granting agencies simply because I want to make sure that Georgia Tech is not viewed as taking sides on issues. However, in maintaining this stance, I do believe we have something to offer in the way of unbiased input into decisions that have important consequences for the region. It is for this reason that I am writing you in connection to the proposed CSX Intermodal Terminal in Fairburn, Georgia. In particular, I have been working on research for the U.S. Department of Transportation and the Georgia Department of Transportation in the area of intermodal transportation for the past five years. Also, I am the principle investigator on a project with the U.S. Environmental Protection Agency which is examining new methods of estimating mobile emissions. Therefore, I have a somewhat unique perspective on the proposed terminal and the estimated impacts on the region's air quality.

Put simply, this type of project is exactly the kind that was envisioned by the U.S. Congress when it passed the Intermodal Surface Transportation Efficiency Act in 1991. Assuring greater efficiencies in transportation by making intermodal transfers more convenient and productive was viewed as one of the most important and cost effective means of improving our nation's transportation system. I have done case studies throughout the U.S. which have examined the improved productivity that results from enhanced intermodal transfers. The Fairburn Terminal certainly falls into this category. Importantly, the concept of removing truck traffic from the region's highways and replacing them with trailer-of-flat-car movements will clearly have major benefits to highway safety, reduced congestion and improvements to air quality. The CSX Fairburn project, in particular, will have a significant positive effect in this regard. This is especially true when one considers that the only other reasonable alternative is to expand operations in the existing Hulsey Terminal which would imply over the long term increased truck operations and the resulting negative impacts in the urban core.

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Because of my research in air quality, I have been interested in the air quality benefits of intermodal facilities such as the Fairburn Terminal. Of course, the major benefit on the air quality side will come from reduced truck traffic as well as from reduced locomotive emissions, especially when compared to long term growth trends at existing sites. I have examined the analysis that has been prepared for this project and the results certainly seem to indicate just this result. This is not surprising because, in general, this is what we are seeing across the U.S. for these types of facilities.

The economic impact of the intermodal facility on the economy of Atlanta will be great. I conclude from the analysis that air quality improvements will also occur. The concept of the Fairburn Intermodal Terminal makes a lot of sense, when viewed from a policy, planning and environmental perspective.

As noted before, I often do not enter into these types of discussions for the reason stated. However, this project comes so close to several research interests of mine that I thought my perspectives might be of interest.

Thank you for your consideration.

Sincerely,

Michael D. Meyer

Michael D. Meyer, P.E.
Professor and Chair
School of Civil and Environmental Engineering
Georgia Institute of Technology