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## APPENDIX D-2

### Environmental Consultation

This appendix documents the environmental consultation process required by SAFETEA-LU, as promulgated and codified in 23 CFR 450.322(f)(7). The substance of the process consisted of two meetings with the environmental consultation group. The membership of this group included all of the same agencies that participated or were encouraged to participate in *Envision6*, the region's previous long range transportation plan. Those agencies are identified in the meeting summaries provided below. Additionally, the consultation process involved discussion and review of the project prioritization methodology and how environmental impact data was incorporated within it.

PLAN 2040 consisted of a very rigorous project prioritization process. The environmental assessment component was very similar to the one used in *Envision6*. The methodology involved the use of spatial analyst (a GIS tool) to determine the total area of a project likely to have a physical presence within one of the six environmentally sensitive areas. The following maps depict the constrained project list overlaid on top of each of the six sensitive areas. These maps were provided to the consultation group for opportunity to review any particular projects with respect to any of the six sensitive area coverages. These maps can also be downloaded from ARC's PLAN 2040 website at [www.atlantaregional.com/plan\\_2040](http://www.atlantaregional.com/plan_2040). For further detail regarding the spatial analyst process and results of the environmental assessment, please refer to Appendix C.

**Figure 1: Flood Plain Overlay**

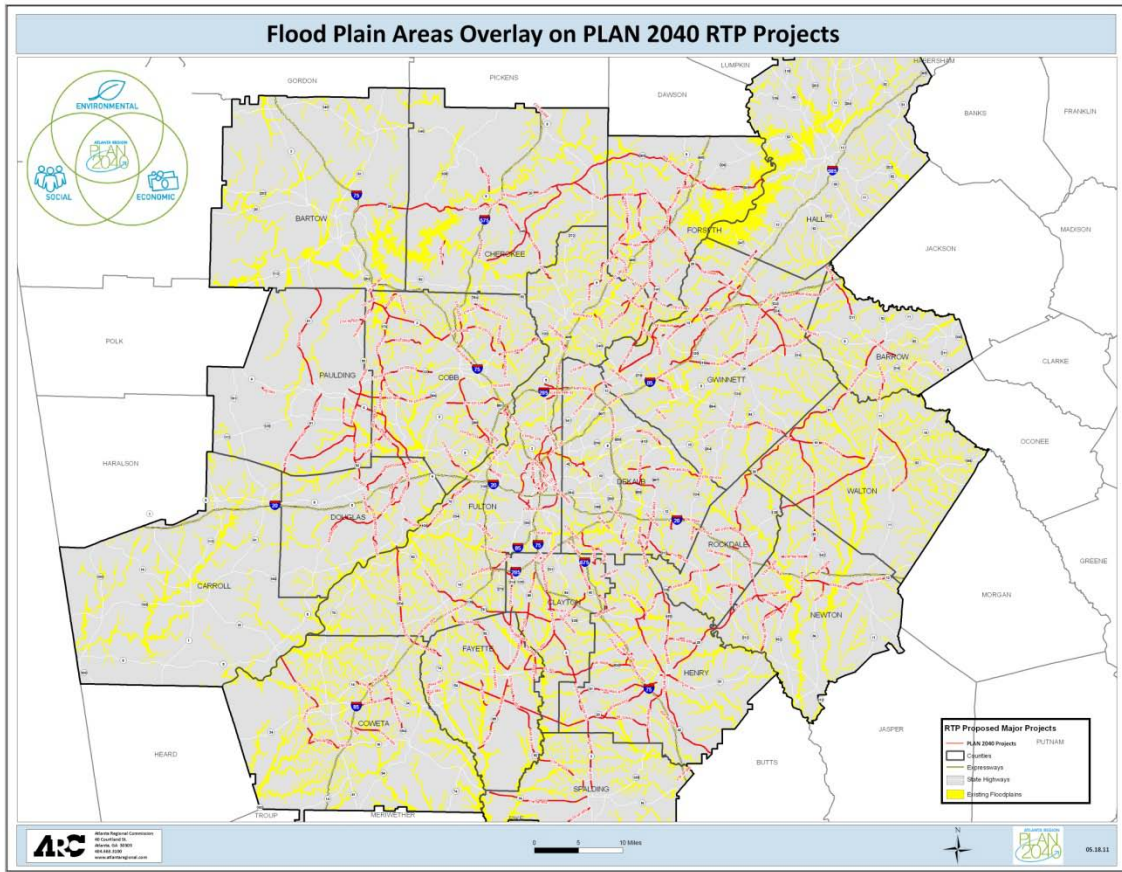


Figure 2: Greenspace Overlay

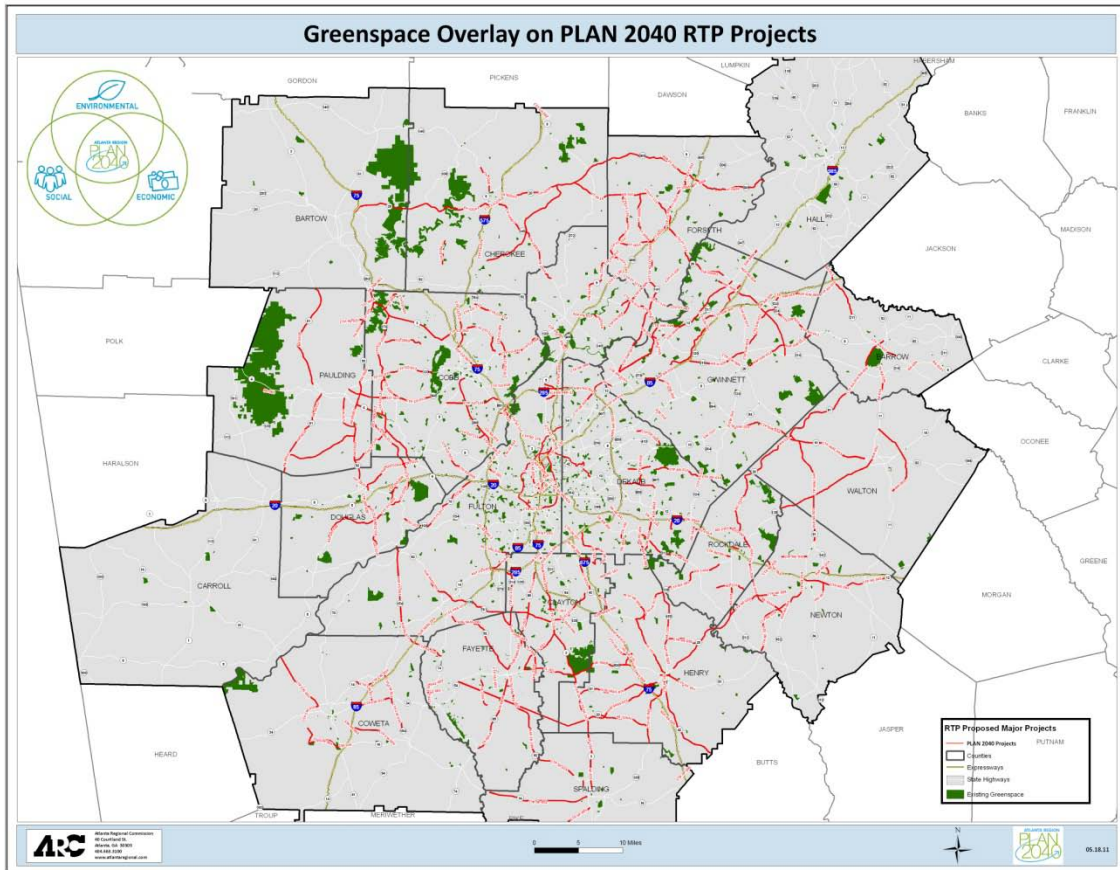


Figure 3: Historic Sites Overlay

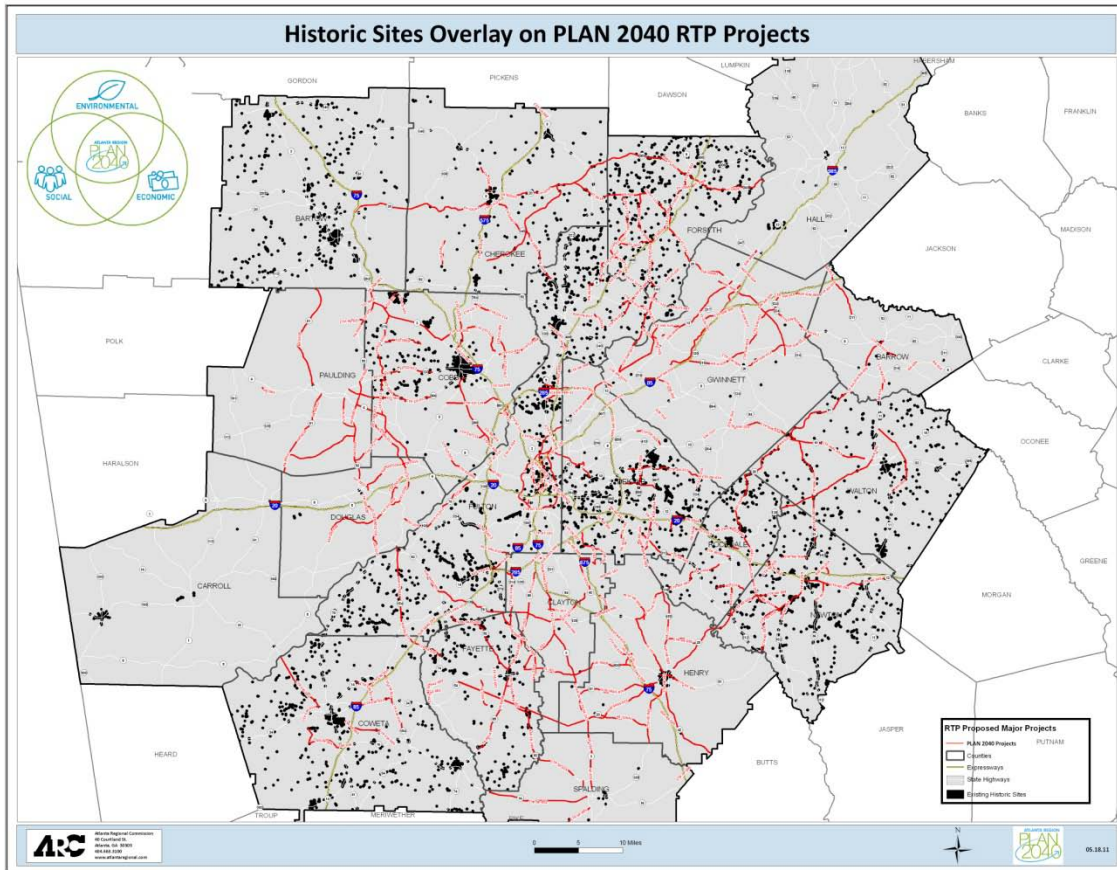


Figure 4: Water Bodies Overlay

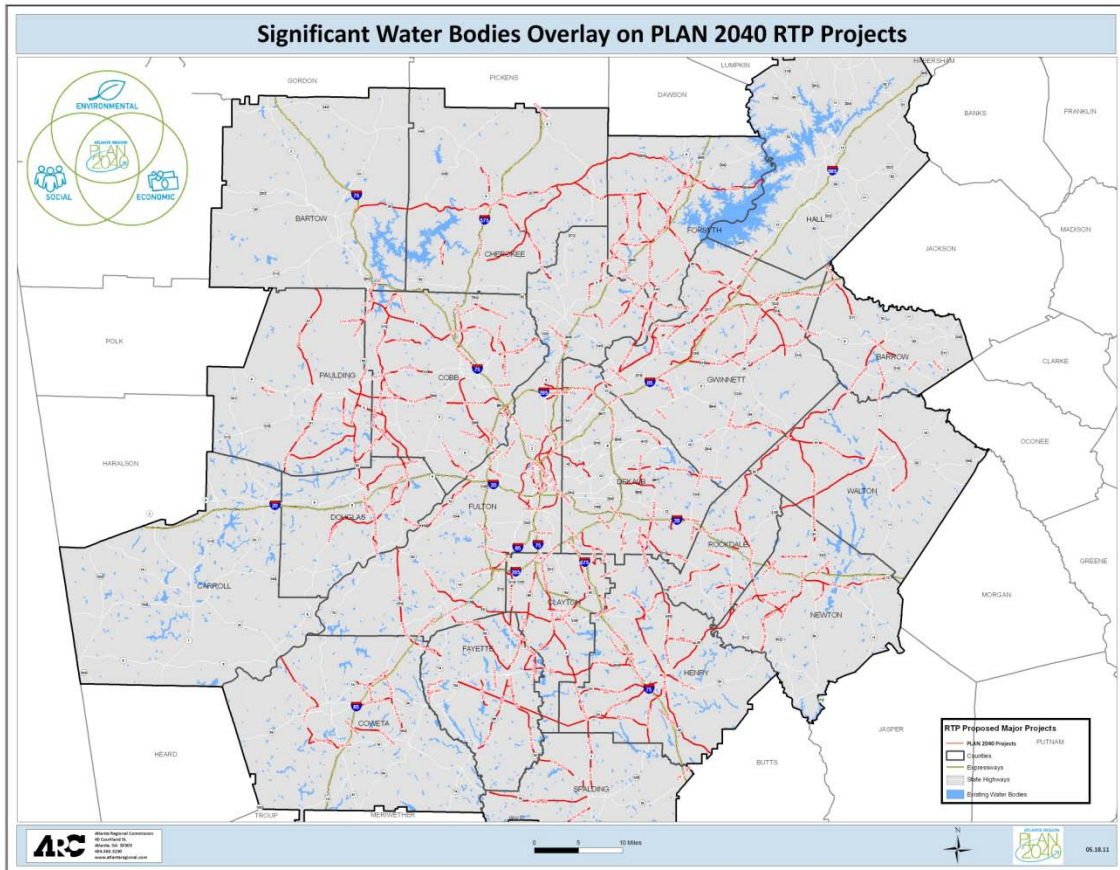
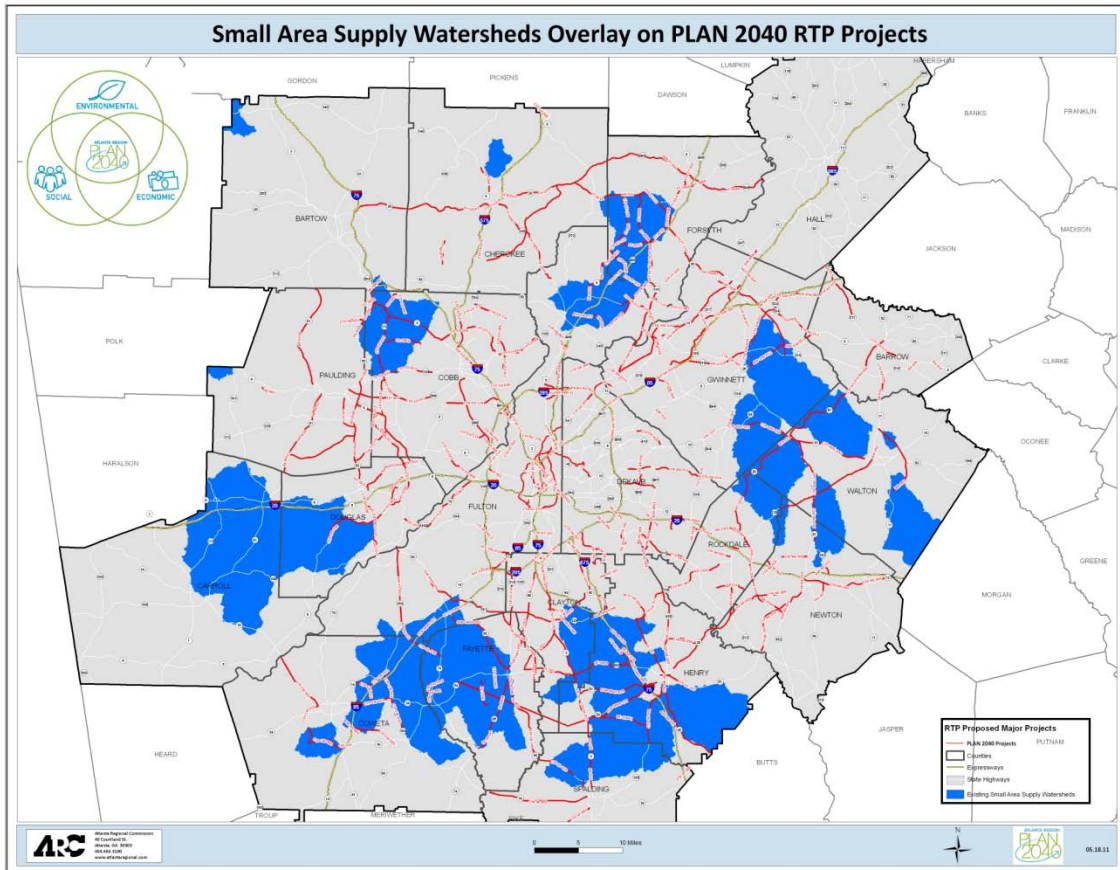
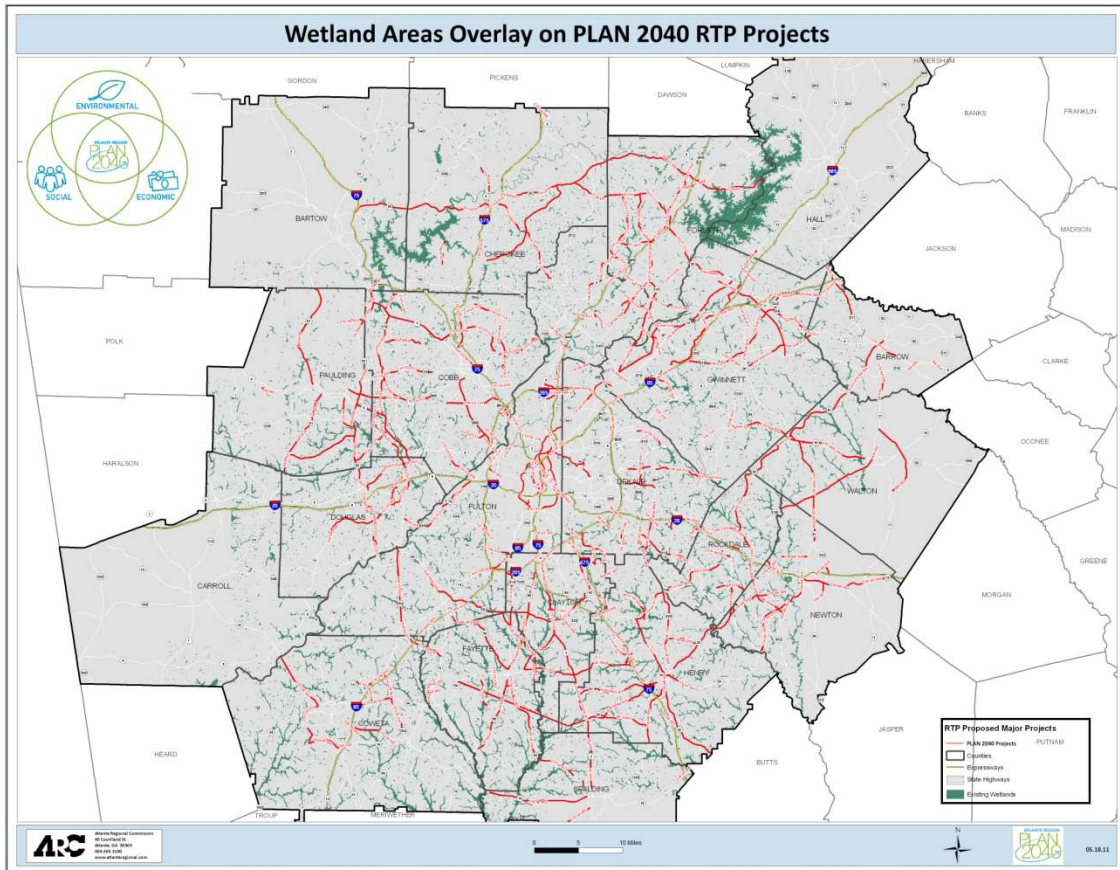


Figure 5: Small Area Supply Watersheds Overlay



**Figure 6: Wetlands Overlay**



In addition to discussing the methodology used to rank projects based on potential environmental impact, the group also reviewed preliminary PLAN 2040 recommendations regarding plan implementation. Such recommendations and ensuing discussion are captured in the meeting summaries included below. In general, PLAN 2040 includes a more strategic process for improving plan and project implementation and monitoring performance as part of the Plan Management Process (outlined in Chapter 6). This process will be the most appropriate way to address some of the environmental concerns that occur at the project level.

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**ENVIRONMENTAL CONSULTATION PROCESS**  
**MEETING #1**  
**OCTOBER 20, 2010**  
**10:00 a.m. – 11:00 a.m.**  
**ARC Offices – Chattahoochee Conference Room**

**MEETING SUMMARY**

<b>Attendees</b>	
<b>ARC</b>	Mike Alexander, Jim Santo, John Orr, Kyung-Hwa Kim, David D'Onofrio, Allison Duncan, Paul DiGirolamo, Kofi Wakhisi
<b>GDNR</b>	Dean Baker
<b>GDOT</b>	Matthew Fowler, Andrew Heath, Tom McQueen
<b>FTA</b>	Keith Melton
<b>FHWA</b>	Carlos Gonzalez, Jennifer Giersch, Katy Allen, Chetna Dixon

<b>Invitees Unable to Attend</b>	
<b>ARC</b>	David Haynes, Judith Dovers, Pat Stevens, Regan Hammond
<b>FHWA</b>	Andy Edwards, Michelle Lindberg
<b>FTA</b>	David Schilling
<b>GDCA</b>	Jim Frederick
<b>GDNR</b>	John Thompson, Jon Ambrose, Marlin Gottschalk
<b>GDOT</b>	Susan Knudson
<b>GEMA</b>	Charles Dawson
<b>GRTA</b>	Brian Borden
<b>GSWCC</b>	Russel Toning
<b>NPS</b>	Charlotte Gills
<b>USACOE</b>	Mary Dills, Michael Ruth
<b>USEPA</b>	Diana Smith, Heinz Mueller
<b>USFWS</b>	Pete Pattavina, Sandy Tucker

**1. Welcome**

Kofi Wakhisi welcomed the group and facilitated brief introductions.

**2. Re-cap of SAFETEA-LU Environmental Consultation Requirement**

Wakhisi explained that the environmental consultation process is a minimum requirement of the metropolitan transportation plan update (*PLAN 2040*). Included below is the actual language cited from 23 CFR 450.322(f)(7):

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*“The metropolitan transportation plan, at a minimum, shall include activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the metropolitan transportation plan. The discussion may focus on policies, programs, or strategies, rather than at the project level. The discussion shall be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies. The MPO may establish reasonable timeframes for performing this consultation.”*

Wakhisi clarified that this meeting would be the first of several to help facilitate the environmental consultation process for *PLAN 2040*.

### **3. Overview of PLAN 2040**

Allison Duncan, ARC, commented on the fundamentals of *PLAN 2040* as well as some of the overarching themes and policies. The primary vision of the plan promotes the concept of sustainability by leveraging visionary leadership to balance environmental responsibility, economic growth, and social needs, while maximizing benefits to all. Duncan summarized the plan goals and objectives and how the various *PLAN 2040* initiatives (e.g., Regional Transportation Plan and Regional Resource Plan) will study and address each objective. Duncan relied on a Power Point slide presentation to help illustrate the concepts and strategies.

#### *Regional Transportation Plan*

Wakhisi continued the discussion by explaining the major themes of the plan, including the conflict between appropriating future funding to maintain and preserve existing infrastructure and expanding the transportation system to accommodate future growth and economic development. Wakhisi described the situation as a “funding crisis,” plainly demonstrated by the \$64 billion budget targeted at \$170 billion in identified transportation infrastructure needs. Therefore, in order to help prioritize the \$64 billion, ARC developed six transportation plan Emphasis Areas that address the plan goals and objectives: (1) Mobility; (2) Connections/Access; (3) Safety; (4) Economic Growth; (5) Community/Environment; and (6) State of Good Repair. Specific performance measures were identified for each of the emphasis areas in order to quantitatively evaluate each roadway and transit capacity project.

#### *Regional Resource Plan*

Duncan spoke a few minutes about the new Georgia Department of Community Affairs (DCA) requirements, including the mandatory development of a Regional Resource Plan. The purpose of the Resource Plan is to enhance the protection and management of important natural and cultural resources; to plan for development impacts on these resources; and to improve local, regional, and state level coordination. Duncan felt that the Resource Plan would be an excellent format not only for strengthening coordination among the various jurisdictions and agencies, but also to solidify the link between resource management and regional land use and transportation planning.

Part of developing the Resource Plan included the completion of the Regionally Important Resource (RIR) inventory. Numerous resources were categorized into three groups: areas of conservation and/or recreational value; historic and cultural resources; and areas of scenic and/or agricultural

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value. Although, there has not been an opportunity to confirm, Wakhisi noted that many of the same areas inventoried are also captured by the six environmentally sensitive areas discussed below.

#### **4. Environmental Measures and Methodology used in *Envision6* and *PLAN 2040***

Wakhisi gave a brief overview of the methodology used to evaluate capacity-adding transportation projects for *PLAN 2040* development. Six (6) key resource areas were identified at the regional level in order to estimate potential environmental impact for each project evaluated: (1) Flood Plains; (2) Wetlands; (3) Historic Resources; (4) Major Water Bodies; (5) Small Area Supply Watersheds; and (6) Greenspace. These are the same coverage layers used to conduct the environmental assessment for *Envision6* projects.

Each project was assigned a composite score based on its overlap or proximity to all six of the pre-determined sensitive resource locations. ARC staff conducted a GIS (geographic information system), spatial analyst exercise that automatically calculated the percent of each project that overlapped any of the six sensitive resource areas. All resources were weighted equally, and the potential “cumulative impact” score accounted for twenty percent (20%) of the total roadway capacity score and five percent (5%) of the transit capacity score. Wakhisi informed the group that the results of the project evaluation would be made available to them for review at a future date.

As for improving and expanding the *PLAN 2040* environmental assessment methodology, Wakhisi mentioned that more work needs to be done with the historical data. The current data set that facilitated the historic resources assessment, NAHRGIS (Georgia Natural, Archeological, and Historic Resource GIS), is incomplete and spatially inadequate for the type of GIS analysis that was used. Wakhisi also asked the group if there should be any other sensitive areas identified for future analysis, but none were proposed at the meeting.

#### **5. Recap *E6* Environmental Consultation Feedback and Incorporation into *PLAN 2040***

Wakhisi reminded the group of the comments and suggestions culminating from the 2007 consultation process used to help develop the previous transportation plan, *Envision6* (*E6*). Some of the *E6* comments discussed were:

1. Discover a more proactive way of identifying potential project “show stoppers” and use to use that information when programming the RTP or the TIP (transportation improvement program).
2. Improve the scrutiny of projects that are likely to have a significant impact on stormwater management, and provide more assurance that these projects incorporate BMPs (best management practices) within the scope, cost, and implementation schedule.
3. Since large scale transportation projects have predominantly increased impervious surface area, perhaps a cumulative impact should be assessed, in addition to the project-level impacts.

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4. Potential improvements should be made to historical and endangered species datasets, so that they have enough integrity for conducting large-scale, regional assessments such as the one done for *E6* and *PLAN 2040*.

While addressing the first comment listed above, ARC has introduced a new “Scoping” (“SCP”) phase to be added to the beginning of the project development process. The SCP phase is intended to utilize federal funds “to undertake a detailed concept study and feasibility evaluation of the project to determine more accurate cost estimates for final engineering, right-of-way acquisition and construction, as well as a realistic implementation schedule. Funds for subsequent phases [preliminary engineering (PE), right-of-way acquisition (ROW), and construction (CST)] will not be approved for final release until estimates are approved by ARC and reflected in the plan.”

ARC anticipates that a detailed concept study will help reveal particular environmental impacts that might either impede the progress of the project in terms of unaccounted for delay, or increase construction cost for incorporation of suitable mitigation measures. More details of the scoping phase methodology can be found in the *TIP/RTP Blueprint 2010: A User’s Manual for the Atlanta Region’s Transportation Improvement Program and the Regional Transportation Plan*.

Wakhisi suggested that the other suggestions can be addressed through regular, on-going coordination with the relevant stakeholders as well as the PLAN 2040 Plan Management program. The Plan Management Program will set business rules and practices for implementing projects, strategies, and policies. Details regarding the Plan Management program will be provided at the next consultation meeting.

Katy Allen, Federal Highway Administration (FHWA), mentioned that the agency is working with the U.S. Environmental Protection Agency (USEPA or EPA) to also identify procedures for overcoming environmental delays that occur during project implementation. One program Allen mentioned was “Every Day Counts,” which focuses on renewing efforts to expedite project delivery.

## **6. Discussion Regarding Second Meeting**

Wakhisi advised that the next meeting is tentatively scheduled for December, 2010, but an announcement will be made prior to scheduling the meeting.

**ENVIRONMENTAL CONSULTATION PROCESS**  
**MEETING #2**  
**May 6, 2011**  
**11:30 a.m. – 12:30 p.m.**  
**ARC Offices – Harry West Community Room**

**MEETING SUMMARY**

<b>Attendees</b>	
<b>ARC</b>	Dan Reuter, Jim Santo, John Orr, Kyung-Hwa Kim, David D’Onofrio, Allison Duncan, Paul DiGirolamo, Regan Hammond, Abby Owens, Patrick Bradshaw, Kofi Wakhisi
<b>GDOT</b>	Jim Pomfret
<b>FHWA</b>	Carlos Gonzalez, Jennifer Giersch, Katy Allen, Rিকেলে Ginnie

<b>Invitees Unable to Attend</b>	
<b>ARC</b>	David Haynes, Judith Dovers, Pat Stevens, Mike Alexander
<b>FHWA</b>	Andy Edwards, Michelle Lindberg
<b>FTA</b>	David Schilling, Keith Melton
<b>GDCA</b>	Jim Frederick
<b>GDNR</b>	Dean Baker, John Thompson, Jon Ambrose, Marlin Gottschalk
<b>GDOT</b>	Matthew Fowler, Susan Knudson
<b>GEMA</b>	Charles Dawson
<b>GRTA</b>	Brian Borden
<b>GSWCC</b>	Russel Toning
<b>NPS</b>	Charlotte Gills, Raukisha Ray
<b>USACOE</b>	Mary Dills, Michael Ruth, Ed Johnson
<b>USEPA</b>	Bob Lord, Diana Smith, Heinz Mueller
<b>USFWS</b>	Pete Pattavina, Sandy Tucker

**1. Welcome**

Kofi Wakhisi, Atlanta Regional Commission (ARC) welcomed the group and facilitated brief introductions.

**2. Relevant PLAN 2040 Non-Transportation Deliverables**

Wakhisi explained that the environmental consultation process is a minimum requirement of the metropolitan transportation plan update (*PLAN 2040*). Allison Duncan, ARC, gave a brief overview of the various draft-final documents and deliverables of PLAN 2040, and how those documents culminate into a PLAN 2040 Work Program. The Work Program will provide direction to ARC for implementation related to several activities, such as:

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- Livable Centers Initiative
  - Workforce and Economic Strategy
  - Green Communities
  - Lifelong Communities
  - Transportation Planning
  - Sustainable Communities
  - Regional Resource Plan
  - Transit Oriented Development
  - Housing and Development
  - Plans, Designs and Codes
  - Regional Performance Standards

Duncan continued by presenting the latest Unified Growth Policy Map (UGPM), which was originally conceived during the *Envision6* long range transportation and development planning process in 2005. The updated 2011 UGPM will be adopted as part of the PLAN 2040 process, in July, 2011. Katy Allen, Federal Highway Administration (FHWA), inquired about the level of coordination with local governments during the UGPM update. Duncan explained that the new UGPM does account for local future land use policy, and is reconciled with regional socio-economic forecasts and policies. A copy of the UGPMN is included in the PowerPoint presentation provided during the meeting.

Associated with the UGPM, are the Regional Development Guidelines, which tailor to each typology of the UGPM. Duncan referenced this framework in order to demonstrate how policy translates into implementation strategy. Duncan explained how the guidelines identify specific priorities for regional areas.

Finally, Duncan provided a brief description of the Regional Resource Plan, which contains the following inventories:

- Areas of Conservation for Recreational Value
- Areas of Historic and Cultural Value
- Areas of Agricultural and Scenic Value

In addition to these inventories, Duncan mentioned that the Resource Plan also features guidance for development practices and for protection measures, specific to each of the resource classifications listed above. Duncan also emphasized the importance of consolidated resource data management will be in supporting PLAN 2040 implementation. One specific example she provided involved the reconciliation and maintenance of NAHRGIS (Natural and Historic Resource GIS) datasets. Duncan briefly described the current data collection and recording practices, and how those efforts can be streamlined and centralized for the Metro-Atlanta area. One particular opportunity might be with the NEPA, Section 106 review process, whereby the survey data gets captured electronically in GIS, thus minimizing the chances of redundant surveys or inaccuracies.

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### 3. PLAN 2040 Transportation Plan Highlights

Regan Hammond, ARC, summarized the overall process of producing the transportation component of the plan: plan development and plan management.

#### *Plan Development*

Hammond explained that the plan development was a two-phased process whereby ARC staff conducted project-level assessment as well as plan-level assessment. The project-level assessment includes the environmental impact component, which was described in more detail at the PLAN 2040 October 21, 2010 meeting. The project-level assessment was used to help prioritize the list of project submittals into a \$60.5 billion list, of which 70% (\$42.6 billion) was allocated to existing system optimization and maintenance. Only 26% (\$15.9 billion) of the total plan budget was allocated to capacity expansion.

Wakhisi reminded the Consultation Group that each capacity expansion project (roadway and transit) was evaluated based on the “footprint” of the scope of the project that intersects any of the six (6) environmental sensitive areas defined in *Envision6* (previous RTP). Wakhisi also reminded the group that this potential impact assessment was combined with other project evaluation criteria such as mobility, accessibility, safety, state of good repair, and economic vitality, and each project ultimately received a composite score featuring the quantified assessment of all criteria combined.

In addition to the project-level assessment, PLAN 2040 also introduces a new Scoping (SCP) phase into the project development process. The Scoping phase is a process whereby certain long-range capacity projects are selected for up-front analysis of scope adequacy (i.e., project type, termini, multi-modal accommodations) as well as potential environmental impacts, in more detail than what was provided by the project-level assessment used to prioritize projects. By introducing this phase, ARC can expect to streamline the advancement of projects by addressing project challenges that normally surface later on during the implementation cycle, much earlier on in.

The key towards facilitating this process depends on the dedicated Multimodal Corridor and Scoping study funds that have been dedicated for this type of planning and review activity. ARC has programmed \$10 million for fiscal years 2013 and 2016 (\$20 million total) in the Transportation Improvement Program (TIP) to facilitate the Multimodal Corridor Scoping and Design Program. Hammond explained that the process for selecting the corridors has not been identified, however that will be something that is developed during the PLAN 2040 Plan Management Process, described below.

Allen, FHWA, suggested that the deliverable of the Scoping phase should focus on documenting the decision-making process as it relates to environmental review and project scope adjustments. Allen expressed that this is the essence of the Federal Highway Administration’s (FHWA) Every Day Counts initiative. This ultimately will help with the NEPA review process when it comes to reviewing why alternatives are eliminated, and help reduce the amount of review time as well as chances for project delay.

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### *RTP Plan Management*

Hammond explained that, similar to the land use and important resource components of PLAN 2040, the transportation component also includes an in-depth implementation strategy. This will be referred to as the Plan Management Process. Hammond listed the three key elements of this process: (1) tracking business practices and agency success; (2) tracking project implementation; and (3) measuring plan impacts. Hammond suggested that the first element is most relevant to the environmental consultation and review process. Hammond proposed several new activities related to business practice tracking such as defining inter-disciplinary project oversight teams, creation of an internal environmental coordination unit, develop a climate change action plan with Georgia Department of Transportation (GDOT), and expansion of tracking and reporting process to operations related programs and projects. All of these initiatives are consistent with the Everyday Counts Program.

Wakhisi asked the group to consider and discuss any possible formats and framework for organizing any of these activities as well as the stakeholders likely to be involved. Carlos Gonzalez, FHWA, suggested using the USHUD/EPA/DOT Partnership for Sustainable Communities as a model and resource when thinking about on-going project review coordination, collaboration, and streamlined project delivery.

Dan Reuter, ARC, mentioned that the agency recently applied for funding through the Regional Sustainable Consortium. If awarded based on the “preferred status” designation, ARC could receive funds to help plan and promote transit oriented developments (TOD) around MARTA heavy rail transit stations. Reuter suggested that the most sustainable way to develop and live in the Atlanta region was by doing it adjacent to rail stations.

Jennifer Girsch, FHWA, also expressed the importance of inter-agency coordination, and how that was a big lesson learned during the time when major impact studies (MISs) were conducted. That type of collaboration helps bridge the gap and facilitates a transition between the planning process and NEPA review and requirements.

Allen expressed some caution when thinking about how to organize and facilitate interagency collaboration because many of the required staff and officials already have time constraints and often struggle to relate to this type of engagement since it is relatively new. Allen suggested that the key of interagency collaboration perhaps might be to conduct diligent and efficient early coordination with agencies like GDOT. It will take more than just setting a meeting up, and ARC needs to demonstrate how early coordination will benefit a particular resource agency because an agency may not understand their role in the coordination process. Early comment letters are currently circulated among resource agencies for transportation projects, and this may be an existing mechanism that could be expanded to facilitate better inter-agency collaboration.

## **4. Potential Project-Level Mitigation Strategies and Integration with Project Delivery and Plan Management**

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Wakhisi discussed how the regional planning process is starting to focus more on planning for environmental mitigation. In 2007, ARC completed “Connect Six,” one of three studies completed through the Multimodal Corridor Study Program. One of the unique recommendations of the study was to implement rain gardens. Wakhisi explained that this type of recommendation was consistent with some of the recommendations provided during the *Envision6* Environmental Consultation Process. While Girsch, FHWA, applauded policies and strategies that looks at decreasing the amount of impervious surface coverage in the region, policymakers should be cautious in making future recommendations regarding vegetative barriers because there is apparently a shortage in the supply of native plants. The demand for the seeds has been very high recently.

Jim Santo, ARC, also warned that another flaw with recommending rain gardens is that their maintenance over time is often overlooked, and that these resources could possibly deteriorate over time because of the oversight. Girsch and Allen also added other complexities to consider such as drought conditions, traffic induced erosion of rain garden soils and silt, and intense rainfall. For off-road facilities such as multi-use trails, ADA (Americans with Disabilities Act) compliance can also become an issue. Santo suggested that one possibility might involve conducting a test case of best management practices (BMPs) in a “high impact area.”

## **5. Next Steps**

Wakhisi advised that PLAN 2040 offers some new direction and opportunity when planning for environmental mitigation. Any immediate collaboration probably will not occur until late summer or early fall of 2011. At that time, there will be more insight available regarding the Multimodal Corridor Scoping and Design Program. Wakhisi announced that the official public comment period for PLAN 2040 begins on May 20, and that RTP project lists featuring the quantified environmental impact assessment will be made available to the consultation group.